



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

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2023 Annual Report on Monitoring Employment Actions

October 10, 2024

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I | Introduction

The Office of Inspector General (OIG)'s Compliance unit, situated within its Legal section, has broad oversight responsibilities under the Employment and Hiring Plans which govern the employment practices of the City, including the Chicago Police Department (CPD) and the Chicago Fire Department (CFD), and pursuant to Municipal Code of Chicago (MCC) § 2-56-035. That section states in relevant part:

The inspector general shall have the authority to monitor, audit and review employment actions under the hiring plan and related policies and procedures. In addition, the inspector general shall have the authority to review or investigate allegations of non-compliance with the hiring plan and related policies and procedures.

The Compliance unit came into formal existence as a product of an evolving partnership between OIG and the court-appointed monitor overseeing the City's hiring and promotion practices under the decree entered in *Shakman, et al. v. City of Chicago, et al.*, No. 69- cv-2145 (N.D. Ill.). From spring 2010 through spring 2014, the OIG-*Shakman* monitor partnership gradually transitioned from the court-appointed monitor to OIG for administrative disciplinary investigations, program compliance, and monitoring activities. That transition was completed in June 2014 with the court finding the City in substantial compliance with the *Shakman* decree.

The Compliance unit's responsibilities are specific to monitoring the City's employment actions and include issuing guidance, training, and program recommendations to City departments on a broad and complex array of employment-related actions. The Compliance unit also monitors human resources activities including hiring and promotion, performs legally mandated and discretionary audits, and reviews the City's hiring and employment practices to ensure compliance with applicable rules and laws.

A strong and effective compliance and governance system is critical to the success of the City of Chicago's Employment Plan (the Plan). OIG reviews, monitors, and audits key processes in the Employment Plan and receives complaints regarding the hiring process, including escalations. Escalations, as defined by the Plan, occur when a Department of Human Resources (DHR) recruiter suspends a hiring requisition at any point when they have reason to believe that a hiring manager, hiring authority, or other City employee may have committed a violation of the Plan or may have allowed political reasons or factors or other improper considerations to influence the hiring process.

Pursuant to the MCC § 2-56-035(c), the annual report of OIG's Compliance unit provides statistics on the number of escalations newly initiated, pending, closed with investigation, and closed without investigation. The annual report of OIG's Compliance unit also provides a description of the outcomes, findings, recommendations, and actions taken on the recommendations of any investigation of an escalation. The Compliance unit works to improve the fairness, accountability, and transparency of the City's employment actions.

II | Reporting on Monitoring of Employment Actions

OIG's Compliance unit monitors human resources activities, including recruiting, hiring, and promotion, performs legally mandated and discretionary audits, and reviews the City's employment practices to ensure compliance with the various applicable employment plans. By ordinance, the Compliance unit's mandate includes the authority to review or investigate allegations of non-compliance with the Plan and related policies and procedures.

A | Compliance Escalations Received in 2023

Escalations, as defined by the Plan occur when a DHR recruiter suspends a hiring requisition at any point when they have reason to believe that a hiring manager, hiring authority, or other City employee may have committed a violation of the Plan or may have allowed political reasons or factors or other improper considerations to influence the hiring process. After receiving notification from the recruiter, OIG evaluates the circumstances surrounding the escalation and may do one or more of the following: conduct a review of the hiring sequence, refer the matter to the DHR commissioner or appropriate department head for resolution, and/or refer the matter to the Investigations section of OIG for investigations of misconduct by a City actor.

In 2023, OIG's Compliance unit received 24 escalations as indicated below.¹

Figure 1: Escalations Received in 2023

Escalation Status	Number of Escalations
Newly Initiated	24
Pending	1
Closed with Investigation	22
Closed without Investigation ²	1

III | Summaries of Escalations

Descriptions of escalation outcomes, findings, recommendations, and actions taken on the recommendations of an escalation are below.

1 | Department of Law, Assistant Corporation Counsel II - Regulatory and Contracts Division

On January 17, 2023, OIG received notice from the Department of Law's (DOL's) director of attorney recruitment and professional development of an escalation arising from the interview phase of the above-referenced position. In the hiring sequence, an administrative assistant to the

¹ This report details all escalations received by OIG in 2023 and includes escalations that have not yet been otherwise publicly reported by OIG.

² Escalations categorized as Closed without Investigation are received by OIG with a self-initiated remedy from the DHR Commissioner. The escalation is considered closed after OIG reviews the escalation and concurs with the remedy issued by DHR with no further recommendations made by OIG.

deputy corporation counsel failed to provide notification to OIG regarding a rescheduled candidate interview.

In reviewing the escalation, OIG found that the hiring sequence violated the DOL Hiring Process. Section B, Paragraph 3 of the Hiring Process provides that "...[DOL] shall forward to DHR and OIG the Monitor/Hiring Oversight Notification Form for those Candidates who will be offered an interview at least four (4) business days before the first interview." OIG recommended that, for all future sequences, DOL ensure that all required and/or revised Monitor/Hiring Oversight Notification Forms are completed and provided to DHR and OIG, and took no further action.

2 | Office of Public Safety Administration, Project Manager (HR)

On March 7, 2023, OIG was informed of an escalation by the acting human resources liaison who failed to distribute the required DHR Monitor/Hiring Oversight Notification Form. OIG found that multiple violations of the Plan occurred.

OIG found that the Office of Public Safety Administration (OPSA) failed to provide the Monitor/Hiring Oversight Notification Form until after the candidate had been interviewed and selected. The Plan requires that the "hiring department [must] forward DHR and OIG a list of those Candidates who will be offered an interview at least four (4) days before the first interview."³ OIG further found that the Monitor/Hiring Oversight Notification Form indicated that only one candidate was interviewed for the position despite 51 minimally qualified candidates being provided on the referral list from DHR. The Plan mandates that the "hiring department [must] interview at least one more Candidate than open Positions for three or fewer openings⁴." OIG was also informed that after a candidate was selected, DHR completed the employment verification process and found that the candidate was not minimally qualified for the position. However, since the candidate listed their requisite previous work experience in DHR's Applicant Tracking System, DHR offered the candidate the opportunity to provide a different reference to verify their work history which would substantiate their minimum qualifications. The reference provided the requisite information and the hiring sequence continued to completion.

OIG requested that OPSA report any actions it took within 30 days of receipt of the violation letter regarding the noted violations, but did not receive any response.

3 | Department of Law, Assistant Corporation Counsel III – Federal Civil Rights Litigation Division

On March 9, 2023, DOL's director of attorney recruitment and professional development informed OIG of an escalation arising from the above-referenced hiring sequence. In reviewing the escalation, OIG found that the hiring sequence violated the DOL Hiring Process when DOL failed to provide a revised Monitor/Hiring Oversight Notification Form to DHR and OIG correcting and adding a new interviewer's name when they were added after the initial notification form was sent.

Section B, Paragraph 3 of the DOL Hiring Process provides that "...[DOL] shall forward to DHR and OIG the Monitor/Hiring Oversight Notification Form for those Candidates who will be offered an

³ See City of Chicago Employment Plan, Chapter VI (B)(4).

⁴ See City of Chicago Employment Plan, Chapter VI (B)(6).

interview at least four (4) business days before the first interview.” OIG recommended that, for all future sequences, DOL ensure that all required and/or revised Monitor/Hiring Oversight Notification Forms are completed and provided to DHR and OIG, and took no further action.

4 | Department of Water Management, Filtration Engineer

On March 7, 2023, OIG received notice from a DHR recruiter of an escalation arising from the interview phase of the hiring sequence in which it was reported that a City employee violated the Plan by discussing questions from the interview for the above-referenced position.

OIG reviewed the hiring sequence and found that it did not violate the Plan because the applicants or candidates to whom the interview questions were disclosed had either completed their interview or were not scheduled to interview. DHR reported self-initiated action taken as a precaution that entailed re-ordering the interview questions prior to interviewing the final candidate. OIG concurred that the hiring sequence could move forward and made no further recommendations, and thus no response was required from the Department of Water Management (DWM).

5 | Office of Public Safety Administration, Administrative Assistant II (Medical)

On March 27, 2023, OIG was notified by a DHR recruiter of an escalation arising from the candidate selection phase of the above-referenced hiring sequence. The DHR recruiter indicated that the hiring sequence violated the Plan when a Consensus Meeting for the position was conducted without the assigned DHR recruiter. Chapter V(B)(12) of the Plan requires “a [c]onsensus [m]eeting led by a DHR recruiter...” be conducted after interviews have concluded to select the candidate(s) that will receive an offer of employment. “Accordingly, the DHR recruiter shall ensure that the [hiring] selection is based on the Hiring Criteria, the interviewers’ assessment forms, test results, the applicable terms of a [collective bargaining agreement], if any, and other relevant factors and not on any political reasons or factors or other improper considerations.”⁵

Along with reporting the escalation, DHR recommended a remedy to require that a second Consensus Meeting be held and conducted by the DHR recruiter. After reviewing the escalation, OIG had no further recommendations, and thus no response was required from OPSA.

6 | Office of City Clerk, Administrative Supervisor

On April 3, 2023, OIG received notice from a DHR recruiter that the Office of the City Clerk (OCC) failed to review correspondence from applicants confirming their participation in interviews. OCC proceeded with previously scheduled interviews and the Consensus Meeting without the two candidates whose correspondence was missed. After the Consensus Meeting, OCC extended a contingent offer and gave a tentative start date to a selected candidate. Upon discovery, DHR recommended that OCC place the hiring sequence on hold and schedule interviews for the two additional candidates. OIG agreed with this resolution. Interviews were scheduled for the two candidates who did not attend their respective interviews, and the hiring sequence continued with the candidate selected during the Consensus Meeting.

⁵ See City of Chicago Employment Plan, Chapter V(B)(13).

7 | Chicago Department of Aviation, Asphalt Laborer

On April 18, 2023, OIG received notice from a DHR recruiting coordinator of a rescinded contingent offer for the asphalt laborer position in the Chicago Department of Aviation (CDA). During the employment verification process, it was determined that the candidate did not possess the necessary experience for the position. The candidate wished to add supplemental information that was not previously disclosed in their profile in DHR's Applicant Tracking System; this request was denied because the application period had closed. OIG agreed with DHR's decision to not move forward with the previously selected candidate.

8 | Community Commission for Public Safety and Accountability, Administrative Assistant III

On April 24, 2023, a DHR recruiter informed OIG that, during the above-named hiring sequence, the Community Commission for Public Safety and Accountability (CCPSA) did not administer a test to bidding candidates. In preparing to interview external candidates, the Testing Division of DHR agreed to waive testing for the entire hiring sequence to ensure uniformity. OIG agreed with DHR's decision to waive the test and no further action was taken.

9 | Office of Public Safety Administration, Administrative Assistant II

On April 24, 2023, a DHR recruiter was made aware that OPSA interviewed a candidate for an administrative assistant II position who had not completed the requisite pass/fail test. The DHR recruiter proposed training for the human resources liaisons at OPSA specifically covering the testing process. The DHR recruiter also proposed that they would alert the testing specialist and testing administrator when referral lists are generated for titles that require a test. DHR's Testing Division determined that the pass/fail test should be administered to external candidates. OIG agreed with the proposed solutions and provided additional support during OPSA's training for its human resources liaisons.

10 | Department of Procurement Services, Senior Certification and Compliance Officer

On May 17, 2023, OIG was informed by a DHR recruiter that they were alerted by a Department of Procurement Service (DPS) employee that DPS staff knew the identity of the DPS employee who had been selected for promotion to the senior certification and compliance officer role, despite there being additional candidates still to be interviewed through May 24, 2023. Upon notification, OIG monitored the remaining scheduled interviews and the Consensus Meeting for any improper considerations. After reviewing the completed Candidate Assessment Forms and monitoring the interviews and Consensus Meeting, OIG found no evidence of improper considerations and that candidates were selected based on their skill and knowledge of the position, as well as their seniority as required by their respective collective bargaining agreement and took no further action.

11 | Department of Law, Assistant Corporation Counsel III – Employment Litigation Division

On May 31, 2023, OIG was informed by DOL of a hiring plan violation where no Monitor/Hiring Oversight Notification Form was submitted as required by the Plan for the Assistant Corporation Counsel III position in the Employment Litigation Division of DOL. Upon further review of the escalation, OIG determined that the violation occurred due to temporary staffing shortages on

DOL's Administrative Services team which provides such notifications. OIG informed the department that it had no objections to the hiring sequence proceeding and took no further action.

12 | Chicago Department of Aviation, Assistant Commissioner

On June 6, 2023, OIG learned of an escalation by a DHR recruiter arising from the Assistant Commissioner position at CDA. The Hiring Manager for the sequence contacted the DHR recruiter to advocate on behalf of an actual applicant for the Covered Position and requested that the applicant be placed on the referral list. After reviewing the relevant communications, OIG determined that a violation of the Employment Plan occurred and issued a violation letter to CDA for its violation of the Direct Contact provision as provided in Chapter II(C)(1) of the Employment Plan.

13 | Community Commission for Public Safety and Accountability, Project Manager

On June 20, 2023, CCPSA submitted a Monitor/Hiring Oversight Notification Form for a Project Manager position after the employment activity began. Additionally, CCPSA had not submitted the Monitor/Hiring Oversight Notification Form to their assigned recruiter in violation of the Employment Plan. OIG conferred with the DHR Commissioner who recommended that CCPSA establish procedures to ensure its compliance with the Employment Plan. OIG agreed with the DHR Commissioner's recommendation and further recommended training for all CCPSA staff who participate in hiring-related functions.

14 | Chicago Public Library, Library Page (Districts 1-6)

On June 22, 2023, OIG was made aware of a hiring issue regarding CPL's Library Page (Districts 1-6) interviews that occurred on May 5, 2023. CPL held a "Library Page Palooza" at the Harold Washington Library Center in which candidates were placed on a referral list and scheduled for in-person interviews and a skills assessment. CPL held a Consensus Meeting on June 16, 2023, and selected a candidate for hire. When the DHR recruiter was preparing to send out a Consensus Meeting outcome email, they discovered that a candidate selected for hire did not appear on the referral list and had not applied for the position. The DHR recruiter coordinated with CPL HR to confirm whether the applicant was scheduled for an interview. CPL confirmed that there was no such applicant on the referral list and the applicant should not have been interviewed.

DHR and CPL HR agreed to include a memo summarizing the hiring issue for record-keeping purposes when the hiring sequence was completed. Moreover, DHR and CPL HR proposed to ensure that interviewers are provided with interview schedules and copies of candidate resumes in a timely manner, as well as to create a sign-in sheet to cross-reference against candidates scheduled for interviews. OIG agreed with DHR and CPL HR's proposed solutions and took no further action.

15 | Chicago Department of Aviation, Customer Service Supervisor

On August 30, 2023, OIG received notice from a DHR recruiter that CDA rescinded a contingent offer for the Customer Service Supervisor position. The position requires high-level screening by both the U.S. Department of Homeland Security and U.S. Customs and Border Protection. During the background check and employment verification process, the candidate was unwilling to provide the necessary documentation and comply with the DHR recruiter's requests to complete the hiring process. OIG agreed with DHR and CDA's decision to rescind the contingent offer.

16 | Chicago Department of Public Health, Clinical Therapist II

On August 31, 2023, a DHR recruiter informed OIG that CDPH sought to add applicants who did not meet minimum qualifications to the Clinical Therapist II referral list. During its review, OIG found that CDPH requested to remove required licensures established by the City of Chicago Job Specifications from the job criteria. OIG notified CDPH about the necessity of meeting the minimum qualifications of DHR's Job Specifications pursuant to Chapter V of the City of Chicago Employment Plan. The DHR recruiter screened applicants according to the minimum qualifications in the existing Job Specifications and allowed CDPH to continue with applicant interviews.

In their response, CDPH clarified that it did not wish to change the minimum qualifications for the Clinical Therapist II position but instead wanted to give preference to candidates with more advanced licenses. CDPH further committed to having staff on the Mental Health and Human Resources teams conduct intake meetings for all mental health positions to ensure that nuanced qualifications for mental health positions are met.

17 | Chicago Department of Public Health, Administrative Assistant II

On September 11, 2023, OIG received notice from the Director of Assessment and Selection Methods with DHR that CDPH failed to administer a written skills assessment to any of the candidates for the Administrative Assistant II as planned by the Hiring Manager. The Consensus Meeting had already occurred, and the selected candidate was set to begin on September 13, 2023. OIG found that no violation of the Plan occurred and recommended that the hiring sequence continue.

18 | Department of Transportation, Foreman of Lineman

On September 12, 2023, OIG was notified of an escalation from a DHR Test Administrator which arose from a test administration during the CDOT Foreman of Lineman hiring sequence. The testing administration reportedly violated the City of Chicago Personnel Rules (Personnel Rules) because an applicant was observed cheating during the test administration. While the applicant did not successfully pass the test administration, Rule VI, Section 5 of the Personnel Rules mandates that "[f]raudulent conduct...by an applicant...in any application or examination, shall be cause for the exclusion of such applicant from an examination, or removal of such applicant's name from all employment lists, or for discharge from the service after appointment." OIG found that the Test Administrator failed to exclude the applicant from the examination or remove the applicant's name from all employment lists after it was observed that the applicant was copying from another applicant's examination.

In response to the incident, DHR stated that to remedy further disruptions in testing administrations, it would schedule future tests in different DHR conference rooms to eliminate opportunities for applicants to cheat. Additionally, DHR stated that Test Administrators would be required to remove candidates who are disruptive to the testing administration.

19 | Chicago Fire Department, Commander – Quinn Training Academy

On September 13, 2023, OIG received communication from a DHR Recruiting Coordinator on behalf of the CFD Fire Commissioner regarding a Commander position at the Quinn Training Academy. The CFD Fire Commissioner notified the DHR Recruiting Coordinator that they wished to hire a different candidate than the Deputy Fire Commissioner (Hiring Manager) had selected.

Pursuant to Chapter V(11) of the CFD Hiring Plan, “the selection process for interviewed Positions shall be based on a Consensus Meeting led by a DHR recruiter and attended by all interviewers, along with the Hiring Manager for the Position.” Accordingly, OIG notified CFD that the Fire Commissioner could not change the selected candidate.

20 | Department of Housing, Policy Analyst

On September 21, 2023, a Department of Planning and Development (DPD) employee, who also oversaw hiring matters in DOH, escalated the Policy Analyst hiring sequence out of the belief that a DOH candidate was selected by an interviewer before interviews had been conducted. OIG monitored the candidate interviews as well as the consensus meeting. During real time monitoring, OIG found that no improper candidate pre-selection occurred in the hiring sequence.

21 | Chicago Police Department, Project Administrator

On October 25, 2023, an OPSA Administrative Services Officer notified OIG of CPD’s intention to conduct a second round of interviews for its Project Administrator hiring sequence.⁶ OIG met with OPSA’s Managing Deputy Director of Human Resources who confirmed that the Commanding Officer of the interviewing unit wished to add two additional candidates from the referral list. OIG informed the Hiring Managers that the interviewers must remain the same pursuant to Chapter II of the CPD Hiring Plan. CPD agreed and allowed the hiring sequence to continue with the additional scheduled interviews.

22 | Department of Housing, Housing Development Coordinator

On November 20, 2023, a DPD employee, who also oversaw hiring matters in DOH, escalated the Housing Development Coordinator hiring sequence out of the belief that a DOH candidate was selected by an interviewer before interviews had been conducted. OIG monitored the candidate interviews as well as the consensus meeting. During real time monitoring, OIG found that no improper candidate pre-selection occurred in the hiring sequence.

23 | Office of Public Safety Administration, Supervisor of Grant Administration

On November 22, 2023, an OPSA Administrative Services Officer notified OIG of their intention to remove a candidate from the Supervisor of Grant Administration referral list. OIG met with the Hiring Manager of the Position who alleged that the candidate did not meet minimum qualifications for the position. During its review, OIG found that the DHR recruiter correctly screened the applicant and determined that their experience was relevant and suitable. Additionally, since the Supervisor of Grant Administration is not a Senior Manager title, departmental hiring managers do not need to conduct preliminary or additional screening after the referral list has been sent. Based on this information, OIG recommended that the applicant be interviewed as scheduled.

⁶ Pursuant to Municipal Code of Chicago 2-96-030(a), OPSA assumed “...all rights, powers, duties, obligations, and responsibilities that were formerly exercised by the Public Safety Departments...including, but not limited to: (1) [t]he administration of all related personnel, books, records, property, and funds...”.



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The City of Chicago Office of Inspector General is an independent, nonpartisan oversight agency.

The authority to perform this inquiry is established in the City of Chicago Municipal Code §§ 2-56-030 and -230, which confer on OIG the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct; to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations; and, specifically, to review the operations of CPD and Chicago's police accountability agencies. Further, Paragraph 561 of the consent decree entered in *Illinois v. Chicago* requires OIG's Public Safety section to "review CPD actions for potential bias, including racial bias." The role of OIG is to review City operations and make recommendations for improvement. City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity.

For further information about this report, please contact the City of Chicago Office of Inspector General, 740 N. Sedgwick Ave., Suite 200, Chicago, IL 60654, or visit our website at igchicago.org.

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