



CITY OF CHICAGO  
OFFICE OF INSPECTOR GENERAL

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# 2024 Annual Report on Monitoring Employment Actions

November 21, 2025

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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 2024

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 2024, the Compliance unit received seven escalations as indicated below.<sup>1</sup>

**Figure 1: Escalations Received in 2024**

Escalation Status	Number of Escalations
Pending	2
Referred to DHR Commissioner	1
Closed with Investigation	3
Closed without Investigation <sup>2</sup>	1
<b>Total Newly Initiated</b>	<b>7</b>

## III | Summaries of Escalations

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

### 1 | Department of Aviation, Clerk IV

On March 5, 2024, OIG was notified by a recruiter with DHR that for the hiring sequence for the position of clerk IV with the Chicago Department of Aviation (CDA), CDA did not offer interviews to all candidates on the interview list which had been provided by the recruiter.

<sup>1</sup> This report details all escalations received by OIG in 2024 and includes escalations that have not yet been otherwise publicly reported by OIG.

<sup>2</sup> 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.

After all interviews were completed and job offers extended, the City employee responsible for contacting applicants realized that two applicants were never called to interview. The employee responsible notified DHR and OIG and then contacted the applicants to offer interviews. The applicants each declined. As the violation was the result of a clerical error by the employee, OIG did not have any recommendations for CDA.

## 2 | Department of Technology and Innovation, Accounting Technician

On May 20, 2024, OIG received an escalation related to the Department of Technology and Innovation's (DTI) accounting technician hiring sequence, stating that the department did not use interview questions that were approved by DHR. The Plan provides that "OIG shall evaluate 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 [Department of Human Resources] DHR Commissioner or appropriate department head for resolution, and/or refer the matter to the Investigation Section of OIG." OIG has evaluated the circumstances surrounding the escalation and determined that it should refer the escalation to the DHR commissioner for resolution, and did not take any further action.

## 3 | Chicago Police Department, Program Director

OIG received an escalation on July 15, 2024, arising from the candidate selection phase of a hiring sequence for the position of Program Director with CPD. The escalation stated that the hiring sequence violated the City of Chicago Employment Plan because a consensus meeting for the referenced position was conducted without the assigned DHR recruiter. However, DHR subsequently worked with the Office of Public Safety Administration (OPSA) and CPD to conduct a consensus meeting in August 2024. Chapter V(B)(12) of the City of Chicago Employment 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. The DHR recruiter is tasked with guiding the interviewers assigned to the hire sequence through a discussion in which all interviewers share their thoughts and opinions on interviewed candidates to make a hiring decision.

The DHR recruiter informed OIG that the hiring manager provided the Candidate Assessment Forms to the manager of human resources within OPSA as the human resources liaison was absent. When the DHR recruiter coordinated with the OPSA manager of human resources to obtain the forms, the DHR recruiter was informed that one of the interviewers retired from CPD, and therefore was unavailable to conduct the consensus meeting. Along with reporting this escalation to OIG, the DHR recruiter worked with OPSA and CPD to have the retired interviewer conduct a consensus meeting on August 30, 2024.

After reviewing the escalation, OIG had no further recommendations since the consensus meeting was ultimately conducted and was monitored by OIG. Therefore, no response was required under Chapter XIV(B)(6) of the Employment Plan.

## 4 | Chicago Department of Aviation, IT Security Specialist

On September 19, 2024, OIG received an escalation from an employee with DHR related to the hiring sequence of an IT security specialist with CDA. OIG found that a DHR recruiter for the requisition incorrectly believed that the title was a senior manager position and provided the hiring department application materials for all candidates. However, since the title was not a senior manager position, Chapter V(B)(3) of the City's Employment Plan requires DHR to create a list of

minimally qualified candidates in random order.

This error led to subsequent misunderstandings between DHR and CDA, which resulted in multiple related contacts to OIG. CDA ultimately coordinated with DHR employment services management to determine the individuals that should have been referred and conducted interviews of those candidates in compliance with the Employment Plan.

Accordingly, OIG had no additional recommendations related to the escalation and no response was required from DHR.

## 5 | Office of Emergency Management and Communications, Communications Operations Manager

On December 16, 2024, OIG received an escalation from a DHR recruiter of a complaint regarding the interview phase for an Office of Emergency Management and Communications (OEMC) operations manager hiring sequence. An applicant alleged that the hiring process may not have been properly followed because an interviewer did not write down responses to all questions, and that there was bias, favoritism, and discrimination present.

OIG conducted a full review of the hiring file for the sequence and found that all interviewers submitted candidate assessment forms that contained complete responses for all the candidates. After reviewing the hiring file, OIG determined there was insufficient evidence of an Employment Plan violation, and thus no response was required from OEMC and because the claims of discrimination had already been referred to DHR Diversity and Equal Employment Opportunity (EEO) for review.



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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, 231 S. LaSalle Street, 12th Floor, Chicago, IL 60604, or visit our website at [igchicago.org](https://igchicago.org).

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