



TO: Iris Martinez, Clerk of the Circuit Court of Cook County
James Murphy-Aguilu, Chief of Staff
Mary Anne Spillane, Chief Human Resources Officer (CHRO)
Tiffany Brooks, General Counsel
Anthony Nguyen, Inspector General

FROM: Jennifer Lin, Director of Compliance (DOC)

RE: DOC First Semi-Annual Report 2023

DATE: March 15, 2023

In accordance with Article V, Section B of the Employment Plan (EP) of the Clerk of the Circuit Court of Cook County (Clerk's Office), the following is the DOC's First Semi-Annual Report (Report) for 2023.

This Report summarizes DOC activity between September 15, 2022 and March 14, 2023. As the Clerk's Office was dismissed from *Shakman* on November 21, 2022, half of this period was also monitored by the Compliance Administrator. In addition, the latter half of this period was under the direction of a new Chief Human Resources Officer who began on December 5, 2022. Moving forward and in alignment with HR's quarterly reports, the DOC will provide Semi-Annual Reports on July 15 for activity between January 1-June 30 and January 15 for activity between July 1-December 31. The DOC's next Semi-Annual Report will be issued on July 15, 2023 for activity between March 15-June 30.

The DOC continues to work very collaboratively with HR in its effectuation of all employment actions and appreciates HR's diligence and hard work. The HR team is mighty and compassionate and works to provide the highest level of customer service to Clerk's Office employees.

Violations of EP

Violations of the EP were reported or discovered during this time period. They will be addressed specifically below.

Unlawful Political Discrimination (UPD)

No complaints of UPD were filed or reported.

Political Contacts

Political contacts were reported during the recent Circuit Court Clerk and Court Clerk Trainer promotion processes. Five recommendation letters from Cook County judges were provided by one employee who had applied for a promotion to the Circuit Court Clerk position; all letters were not current and had been written in the past. One recommendation letter from a Cook County judge was provided by another employee who had applied for a promotion to the Court Clerk Trainer position; this letter had also been written in the past. Five recommendation letters from a Cook County judge (identical letters addressed to five separate addressees) were sent on behalf of an employee recommending the employee for a management position. All of these

political contacts were properly reported to the DOC and were all considered to be Permitted Recommendations under the Employment Plan. All of the judges referred to their personal and direct knowledge of the respective employee's work, skill, experience, and job performance.

Employment Plan Training

Three Employment Plan training sessions were performed in person by the DOC with new employees during New Hire Orientation. 27 employees were trained.

Annual Employment Plan training began the last week of February, 2023. As of the date of this Report, 845 employees have completed training.

Other Training

Additional supervisors received Supervisor and Interviewer Training and Probationary Performance Evaluation Training required by the EP. Newly hired HR staff also received required HR training as required by the EP.

Policies

No additional EP or Handbook policies were finalized during this reporting period.

Employment Plan

On March 2, 2023, the Clerk's Office proposed some amendments to the EP. Consistent with the EP, the DOC will review these amendments. These amendments will be further discussed in the next Report.

Posted Positions

The Clerk's Office has continued its aggressive hiring and posted 17 positions during this reporting period. They will be addressed individually below.

Accountant VI

The position was properly posted with two vacancies under the General Hiring Process. The DOC monitored randomization and validated 30 applications and came to agreement with HR on its validation resulting in 15 eligible candidates. The interview process occurred without issue with the DOC monitoring 8 interviews and the Ranking Meeting, where the Interview Panel ranked two candidates. One candidate accepted a position, and another candidate declined the position. No issues were identified with this sequence.

Community Engagement & Outreach Coordinator

The position was properly posted with one vacancy under the General Hiring Process. The DOC monitored randomization and validated 51 applications and came to agreement with HR on its validation resulting in 20 eligible candidates. The interview process occurred without issue with the DOC monitoring 9 interviews and the Ranking Meeting, where the Interview Panel ranked four candidates. The top ranking candidate accepted the position. No issues were identified with this sequence.

Desktop Support Supervisor

The position was properly posted with one vacancy under the General Hiring Process. The DOC monitored randomization and validated 40 applications and came to agreement with HR on its validation resulting in 12 eligible candidates. The interview process occurred without issue with the DOC monitoring 4 interviews and the Ranking Meeting, where the Interview Panel ranked three candidates. The top ranking candidate accepted the position. No issues were identified with this sequence.

HR Coordinator

The position was properly posted with two vacancies under the General Hiring Process. The DOC reviewed and verified randomization and sorting and validated 60 applications and came to agreement with HR on its validation resulting in 38 eligible candidates. Interviews have been scheduled. This hiring sequence will be discussed further in the next Report.

Inspector General Investigator

The position was properly posted with 4 vacancies under the General Hiring Process. The DOC monitored randomization and validated 80 applications and came to agreement with HR on its validation resulting in 29 eligible candidates. The interview process occurred without issue with the DOC monitoring 15 interviews and the Ranking Meeting, where the Interview Panel ranked 6 candidates. The top 4 ranking candidates accepted the position. No issues were identified with this sequence.

IT Data Analyst

The position was properly posted with 1 vacancy under the General Hiring Process. This hiring sequence will be further discussed in the next Report.

IT Security Analyst

The position was properly posted with 1 vacancy under the General Hiring Process. This hiring sequence will be further discussed in the next Report.

Leave Manager

The position was properly posted with one vacancy under the Actively Recruited Position Hiring Process. The DOC validated 19 applications and came to agreement with HR on its validation resulting in 10 eligible candidates. The DOC monitored the Application Review Panel Meeting where the panel agreed to interview 6 candidates. The interview process occurred without issue with the DOC monitoring 4 interviews and the Ranking Meeting, where the Interview Panel ranked 4 candidates. The top 2 ranking candidates declined the position, and the third ranked candidate accepted the position. **During a review of the posting file, the DOC discovered that HR had made a verbal offer to the second ranked candidate without the Justification to Hire and Grant of Authority as required by and in violation of the EP. The Contact Log was also missing this communication. The DOC has reminded HR that the steps in the EP must be followed prior to making a conditional offer to a candidate and that all communications must be logged on the Contact Log.**

MIS Project Manager

The position was properly posted with two vacancies under the General Hiring Process. The DOC monitored randomization and validated 13 applications and came to agreement with HR on its validation resulting in 6 eligible candidates. The interview process occurred without issue with the DOC monitoring 4 interviews and the Ranking Meeting, where the Interview Panel ranked 2 candidates. Both candidates accepted the position. No issues were identified with this sequence.

Motor Vehicle Operator

The position was properly posted with three vacancies under the Entry Level Bargaining Unit Position Hiring Process. The DOC reviewed and verified randomization and sorting and validated 61 applications and came to agreement with HR on its validation resulting in 5 eligible candidates. One offer was accepted, but the person failed to appear on the first day of employment. This hiring sequence will be discussed further in the next Report.

Office Clerk

The position was originally posted with 49 vacancies under the General Hiring Process. **In violation of the EP, a Request to Hire was not submitted to the DOC prior to posting, and the DOC was not given notice of the posting prior to posting for review.** When the DOC learned of the posting and reviewed the live posting, there was a great deal of outdated information. As such, HR immediately took the posting down and communicated to the two individuals who had already submitted applications.

The position was subsequently properly posted with 67 vacancies under the General Hiring Process after a Request to Hire was properly submitted to the DOC and proper notice given. The DOC reviewed and verified randomization and sorting and validated 552 applications and came to agreement with HR on its validation resulting in 171 eligible candidates. This hiring sequence will be discussed further in the next Report.

Senior Accountant

The position was properly posted with one vacancy under the Actively Recruited Position Hiring Process. The DOC validated 10 applications and came to agreement with HR on its validation resulting in 5 eligible candidates. The DOC monitored the Application Review Panel Meeting where the panel agreed to interview 3 candidates. The interview process occurred without issue with the DOC monitoring 3 interviews and the Ranking Meeting, where the Interview Panel ranked two candidates. The top ranking candidate declined the position, and the next ranking candidate accepted the position. No issues were identified with this sequence.

Senior Application Developer

The position was properly posted with one vacancy under the Actively Recruited Position Hiring Process. The DOC validated 8 applications and came to agreement with HR on its validation resulting in 3 eligible candidates. The DOC monitored the Application Review Panel Meeting where the panel agreed to interview all 3 eligible candidates. The interview process occurred without issue with the DOC monitoring 2 interviews and the Ranking Meeting, where the Interview Panel ranked one candidate. This candidate accepted the position. No issues were identified with this sequence.

Senior Procurement Analyst

The position was properly posted with two vacancies under the General Hiring Process. The DOC reviewed and verified randomization and sorting and validated 23 applications and came to agreement with HR on its validation resulting in 14 eligible candidates. The interview process occurred without issue with the DOC monitoring 11 interviews and the Ranking Meeting, where the Interview Panel ranked one candidate. This candidate accepted the position. No issues were identified with this sequence.

Senior Security Investigator

The position was properly posted with one vacancy under the General Hiring Process. **The DOC reviewed randomization and sorting and discovered some issues which were subsequently rectified prior to validation.** The DOC validated 31 applications and came to an agreement with HR on its validation resulting in 20 eligible candidates. The interview process occurred without issue with the DOC monitoring 8 interviews and the Ranking Meeting, where the Interview Panel ranked 4 candidates. This hiring sequence will be discussed further in the next Report.

Senior Workforce Strategy Analyst

The position was properly posted with one vacancy under the Actively Recruited Position Hiring Process. The DOC validated 12 applications and came to agreement with HR on its validation resulting in 2 eligible candidates. The Application Review Panel met and agreed to interview both eligible candidates. **In violation of the EP, the DOC was not given notice of the Application Review Panel meeting for the Senior Workforce Strategy Analyst position and was only made aware of the meeting and decision via email, despite specific reminders of the required notice.** During review of the interview questions, the DOC raised some concerns about the questions being asked as there were fewer questions than the last hiring sequence for this position which took place in September, 2022. The DOC expressed concern that the interview questions were being dumbed down from the previous interviews. Especially concerning is that the hiring sequence 5 months earlier included an internal candidate who was ultimately not ranked after his interview; the internal candidate was essentially subjected to additional and more difficult interview questions than the candidates in this particular hiring sequence. The rest of the interview process occurred without issue with the DOC monitoring 2 interviews and the Ranking Meeting, where the Interview Panel ranked 1 candidate. This candidate accepted the position. **The DOC has reminded HR of the need to comply with the EP and has provided a refresher training to HR on EP requirements.**

Workforce Strategy Analyst

This position was posted with one vacancy under the General Hiring Process. HR gave notice to the DOC of the posting to allow for DOC review. **However, in violation of the EP, a Request to Hire was not submitted to the DOC prior to posting. Upon this discovery, the DOC requested that the Request to Hire be immediately sent.** As this hiring sequence is underway, it will be discussed further in the next Report.

Lateral Transfers

Update on 2022-L3 Financial Clerk and Office Clerk. As mentioned in the last Report, 66 applications were submitted, 16 of which were duplicates and 6 of which were submitted by employees who were still on probation, leaving 44 eligible candidates. The Clerk's Office never made offers on this lateral transfer process.

Five lateral transfer opportunities were posted for Court Clerk Trainer (2022-L4), Circuit Court Clerk (2022-L5), Financial Clerk and Office Clerk (2022-L6), Financial and Office Clerk (2023-L1), and Circuit Court Clerk (2023-L2).

2022-L4 Court Clerk Trainer. 16 applications were submitted, 4 of which were duplicates and 1 of which was submitted by an employee who did not hold the eligible title, leaving 11 eligible candidates. All eligible candidates were offered the lateral transfer, solely based on seniority, with 5 employees accepting offers. No issues were identified with this sequence.

2022-L5 Circuit Court Clerk. 53 applications were submitted, 9 of which were duplicates and 20 of which were submitted by employees who did not hold the eligible title, leaving 24 eligible candidates. 23 eligible candidates were offered the lateral transfer, solely based on seniority, with 15 employees accepting offers. No issues were identified with this sequence.

2022-L6 Financial and Office Clerk. 35 applications were submitted, 7 of which were duplicates, leaving 28 eligible candidates. 27 eligible candidates were offered the lateral transfer, solely based on seniority, with 15 employees accepting offers. **The DOC was given notice on**

December 2, 2022 that offers were being made on December 6, 2022 and at the time of the notice, had not yet been provided the Validated Eligibility List in compliance with the Employment Plan. The Validated Eligibility List was never officially provided to the DOC, but rather, it was uploaded in Teams with no notice given. The DOC did not review the Validated Eligibility List and relied on HR's validation prior to offers being made; this resulted in the DOC also missing the eligibility issue addressed here. During the creation of the call list for 2023-L1 (see below), HR discovered that 14 candidates were improperly validated eligible when they were, in fact, not eligible due to their status as probationary employees. Of those 14 candidates, 8 of them had accepted their lateral transfer offers and had already been laterally transferred. This constitutes a significant violation of the EP as employees who were ineligible to be laterally transferred were deemed eligible by HR, accepted lateral transfer offers, and were laterally transferred.

2023-L1 Financial and Office Clerk. 56 applications were submitted, 6 of which were duplicates, and 23 of which were initially qualified but then later disqualified for ineligibility due to probationary status, resulting in 27 eligible candidates. In violation of the EP, HR did not provide notice to the DOC of the vacancy list prior to posting. Upon review of the vacancy list, the DOC raised some concerns about the location/department listed for 2 Financial Clerk vacancies. HR subsequently revised the vacancy list and extended the posting by two business days. The DOC was given notice on January 17, 2023 that offers were being made on January 19, 2023 and was provided the Validated Eligibility List. The Validated Eligibility List was not listed by seniority order, and the DOC advised HR to revise it. The DOC did not further review the Validated Eligibility List and relied on HR's validation prior to offers being made. During the creation of the call list, HR discovered that 23 candidates were improperly validated eligible when they were, in fact, not eligible due to their status as probationary employees. HR subsequently notified these 23 candidates that they were not eligible due to their probationary status. 27 eligible candidates were offered the lateral transfer, solely based on seniority, with 20 employees accepting offers. The posting file is incomplete and is missing documents; this will be addressed further in the next Report.

2023-L2 Circuit Court Clerk. 51 applications were submitted, 2 of which were duplicates, 7 of which were submitted by employees who did not hold the correct title, and 3 of which were submitted by probationary employees, resulting in 38 eligible candidates. As this sequence is still underway, this will be addressed further in the next Report.

Compliance Recommendations for Lateral Transfers: As a result of the issues which surfaced from 2022-L6 and 2023-L1, a possible amendment can be made to the Employment Plan requiring that the Validated Eligibility List be provided to the DOC prior to the List of Bids Received Forms being posted. In these 2 sequences, validations of eligibility were incorrect which resulted in the List of Bids Received Forms being incorrect. Another important recommendation is for HR to slow down to ensure accuracy in these processes. HR has consistently asked for – and been granted – leeway for the 2 business days' notice required prior to offers being made. The DOC recommends that HR stop rushing to make offers so quickly and to better meet the notice requirements under the Employment Plan. This time is necessary for all parties, including the DOC, to adequately review documents. In addition, the excessively fast pace of these processes is resulting in posting files being non-compliant.

Promotions

Three promotional opportunities were posted for Court Clerk Trainer (2022-P4), Circuit Court Clerk (2022-P5), and Circuit Court Clerk (2023-P1).

2022-P4 Court Clerk Trainer. 35 applications were submitted, 9 of which were disqualified for not meeting the minimum qualifications, resulting in 26 eligible candidates, all of which were validated by the DOC. 15 eligible candidates were offered the promotion, solely based on seniority, with 12 employees accepting offers. **The NEA documenting the October 9, 2022 effective date of these promotions was not properly sent to the DOC until January 27, 2023, only after the DOC discovered the promotions had taken place during a review of the HR Quarterly Report. The DOC recommends that HR send NEAs in a more timely manner consistent with the EP.**

2022-P5 Circuit Court Clerk. 131 applications were submitted, 33 of which were disqualified for not meeting the minimum qualifications, 3 of which were submitted after the deadline, 1 of which was submitted by an employee who later resigned, resulting in 87 eligible candidates, all of which were validated by the DOC. 84 eligible candidates were offered the promotion, solely based on seniority, with 71 employees accepting offers. **Upon review of the posting file, the DOC alerted HR of missing items and HR has addressed some of them. As of the date of this Report, there remain missing items.**

2023-P1 Circuit Court Clerk. As this sequence is still underway, this will be addressed further in the next Report.

Exempt List

The following changes were proposed by the Clerk's Office to be made to the Exempt List:

Add: Director of Data Services and Quality Assurance
 Director of Training & Development
 Director of Workforce Development
 Associate Clerk, Civil/Call Center/Records
 ACDC, Call Center

Remove: CDC, Courtroom Floor Management

Retitle: Deputy CIO, Enterprise Systems to Chief Technology Officer
 MIS Project Manager to Director of Project Management Office

Consistent with the EP, the Clerk's Office provided notice to the DOC with the required rationale and position descriptions. After review and comment, the DOC raised no objection to these changes.

Exempt Hiring

26 Shakman Exempt employees were appointed during this time period, including CDC, Web Services; CDC, Records Storage; MIS Project Manager; ACDC, Domestic Relations; CDC, Juvenile; ACDC, Juvenile; ACDC, Records Storage; ACDC, Traffic; Deputy Director Labor Relations; CDC, Civil; ACDC, Civil; Labor Counsel; Chief of Staff; Chief Human Resources Officer; Deputy General Counsel Labor; Inspector General; CDC, Payroll; Deputy Chief Human Resources Officer Legal; Director of Data Services & Quality Assurance; ACDC, Public Information; Director of Training & Development; ACDC, Operations (2); ACDC, Payroll; Associate Clerk, Court Operations; and Director of Workforce Development. Consistent with the EP, the Clerk's Office properly notified the DOC of the applicants to be appointed and provided their applications and resumes. The DOC confirmed that all applicants met the minimum qualifications required of their respective positions.

Executive Assistant Hiring

The Clerk's Office proposed a revised position description for the Executive Assistant position. The DOC raised some concerns about the proposed revisions and after meeting with the Chief of Staff and CHRO, came to an agreement on an acceptable revised position description. Two Executive Assistants were appointed during this time period under the Executive Assistant Hiring Process. Consistent with the EP, the CHRO properly notified the DOC of the applicants to be selected and provided their applications and resumes. The DOC confirmed that all applicants met the minimum qualifications required of the Executive Assistant position.

Ineligible for Hire/Rehire List

On July 22, 2022, HR updated its Ineligible for Hire/Rehire List and sent out notifications to 11 impacted individuals. 4 appeals were received. The DOC reviewed pertinent documents regarding the 7 individuals who did not appeal and recommended the removal of 2 of them from the List. The CHRO concurred with this recommendation. This resulted in some discussions with the Compliance Administrator about misinterpretation of the Employment Plan and some amendments to further clarify the due process afforded to individuals placed on the List.

For the 4 appeals which were received, hearings with the DOC took place where the individuals and HR were able to provide evidence and testimony. After review, the DOC recommended to the Chief of Staff that 3 individuals remain on the List and 1 individual be removed from the List. The Chief of Staff concurred with the DOC's recommendations.

Probationary Performance Evaluations

The Clerk's Office's last several rounds of probationary performance evaluations have been disorganized and untimely. As a reminder of the policy, evaluation meetings must take place with employees at least 10 days prior to the end of the probationary period. Drafts of the evaluations are required to be sent to the DOC for review at least 2 days before the evaluation meeting with the employee.

For probationary periods ending December 5, 2022, HR sent the reminder to supervisors on November 29, 2022. This resulted in a violation of the policy as employees were not timely evaluated 10 days prior to the end of their probationary periods. In contravention of the policy, some supervisors did not send drafts to the DOC prior to their evaluation meetings, and some evaluation meetings took place after probationary periods ended. HR did nothing to follow up on missing evaluations.

For probationary periods ending January 3, 2023, HR sent the reminder to supervisors a bit earlier on December 15, 2022, but missed a number of supervisors and included a less than accurate list of employees, which was only discovered after the DOC followed up with supervisors on missing evaluations. Again, some supervisors violated the policy and did not send drafts to the DOC prior to meeting with the employee and did not meet with employees in a timely manner as required by the policy. Some evaluations meetings took place after probationary periods ended. One employee did not pass probation; for this employee, the policy was followed, and this employee has been returned to her former position. HR did nothing to follow up on missing evaluations.

For probationary periods ending January 31, 2023, HR sent the reminder to supervisors on January 26, 2023, only after being reminded by the DOC. This resulted in a violation of the policy as employees were not timely evaluated 10 days prior to the end of their probationary periods. In contravention of the policy, some supervisors did not send drafts to the DOC prior to

their evaluation meetings, and some evaluation meetings took place after probationary periods ended. HR did not adequately follow up on missing evaluations and the last outstanding evaluation did not occur until March 9, 2023, over a month past the probationary end date.

For probationary periods ending February 28, 2023, HR sent the reminder to supervisors on February 7, 2023. In contravention of the policy, some supervisors did not send drafts to the DOC prior to evaluation meetings despite HR's instructions, and some evaluation meetings did not take place 10 days prior to the end of their probationary periods. Some evaluation meetings took place after probationary periods ended. HR has not followed up on missing evaluations in a timely manner and as of the date of this Report, 1 evaluation remains outstanding.

For probationary periods ending March 13, 2023, HR sent the reminder to supervisors on March 9, 2023, only after being reminded by the DOC. This resulted in a violation of the policy as employees were not timely evaluated 10 days prior to the end of their probationary periods. The majority of evaluation meetings will take place after probationary periods have ended. As of the date of this Report, 22 evaluations remain outstanding. This activity will be addressed in the next Report.

For probationary periods ending March 19, 2023, HR sent the reminder to supervisors on March 3, 2023. As of the date of this Report, 1 evaluation remains outstanding. This activity will be addressed in the next Report.

The DOC recommends that HR take better control of the probationary performance evaluation process and to implement a better system of keeping track of probationary period end dates. This will ensure a timelier reminder to supervisors so that employees are being evaluated consistent with the policy. The DOC also recommends that HR do a better job of communicating with supervisors about the policy requirements, to demand supervisor compliance with the policy, and to follow up more consistently regarding missing evaluations. More importantly, the DOC recommends that HR slow down with some of its processes. As evidenced above, the probationary periods run over each other, which has burdened HR and supervisors. A more intentional and thoughtful schedule would enable HR to be more organized and diligent. To ensure better compliance, the DOC recommends refresher training to HR and supervisors about the policy and its requirements.

Notices of Employment Action

While most NEAs are being sent to the DOC in a timely manner, there are others which are delayed by months. As addressed earlier, the DOC was never made aware of promotions under 2022-P4 and only inquired about them after reviewing the information for the HR Quarterly Report, which resulted in a delayed NEA. **In violation of the EP, the DOC has recently received several NEAs for disciplines which were imposed in December, 2022, nearly 3 months late.**

The DOC recommends that HR remind supervisors that NEAs must be submitted to HR on a timely basis in accordance with the EP.

Overall Recommendations

- HR needs to familiarize themselves – and constantly remind themselves – of the EP requirements regarding notice and process. Proper and timely notice needs to take place for all steps of all the different hiring processes, be it randomization, application review panel meetings, interviews, ranking meetings, postings for lateral transfers and promotions, selection, etc. Post-

dismissal from Shakman, the DOC has taken a more relaxed approach to notice requirements, but HR should not take this approach as permission to completely ignore the notice requirements.

- HR needs to become more comfortable with the randomization and sorting requirements under the General Process. There remain some challenges during the DOC's review of sorting prior to validation. This will improve the more often it is done by HR staff.

- HR needs to slow down and be more organized. Lateral transfers and promotions are moving much too quickly, and this is resulting in some chaos. As illustration, the 2023-P1 promotional application came down a couple of days ago, but there is no posting file to review yet. Meanwhile, offers were made for lateral transfers in 2023-L2 two weeks ago and nothing has been added to the posting file. It is unclear whether employees have been sent confirmation letters or if HR has received signatures. Files remain missing from other posting files. If HR can slow down, it can take better control of each process and ensure EP compliance at all steps. These selection processes also trickle down to the performance evaluation process.

- HR needs to manage the performance evaluation process better and do a better job of demanding supervisor compliance with the policy and following up on missing evaluations.

- HR needs to conduct refresher training for supervisors and HR on EP requirements.

- Most importantly, HR needs to use the DOC as a resource. HR staff have to feel comfortable asking for help and not feel fearful to seek guidance from or talk to the DOC. It is important that HR staff have the discretion, autonomy, and comfort to call on the DOC for assistance and support. This is vital to maintaining a collaborative and cooperative spirit between HR and the DOC.

Conclusion

The DOC looks forward to implement additional policies, training, and improvement processes to comply with the EP and the continued cooperation of Clerk Martinez and her senior staff to maintain compliance. Since the Clerk's Office's dismissal, there have been no additional efforts to finalize the Employee Handbook and associated policies. This should be a priority.

Repeated violations of the EP have not resulted in unlawful political discrimination but can be easily avoided with increased attention to detail and organization from HR. With additional staff and the addition of a Director of Workforce Development, the DOC is confident that HR can increase its effectiveness, organization, and efficiency. The DOC is aware that staff shortage in the Clerk's Office has adversely impacted court operations, but if HR continues to rush through hiring, lateral transfers, and promotions, it will continue to result in messy and disorganized attention to detail and non-compliance with the EP. Incorporation of the DOC recommendations in this Report will assist with future compliance.

The DOC is confident that HR will continue to grow and improve and looks forward to a continued healthy working relationship.