MARIYANA T. SPYROPOULOS
CLERK OF THE CIRCUIT COURT

COMPLIANCE DEPARTMENT

George W. Dunne Building
69 W. Washington St, Suite 2500
Chicago, Illinois 60602
Office (312) 603-6908
Fax (312) 603-5043

OFFICE OF THE CLERK OF THE CIRCUIT COURT OF COOK COUNTY

TO: Mariyana T. Spyropoulos, Clerk of the Circuit Court of Cook County
Michael Ciaccio, Chief of Staff
Chad Gearig, Deputy Chief Human Resources Officer
James Chandler, General Counsel
Katarina Durcova, Inspector General

FROM: Dana R. Andrews, Director of Compliance, (DOC)

RE: January 2025 Semi-Annual Report

DATE: January 15, 2025

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 January 2025 Semi-Annual Report (Report).

This report details compliance – related activities between July 1, 2024 and December 31, 2024 and will be posted on the Clerk of the Circuit Court's website. During the final month of this reporting period, the Clerk's Office welcomed a new leadership team. While the majority of this Report focuses on activities conducted under the previous administration, the information contained herein provides insight into the processes that have been implemented and proposed recommendations to sustain continued compliance with the EP and support Clerk Spyropoulos' pledge to ensure the office's services are transparent, accountable and accessible.

I welcome the support of and look forward to working with Madam Clerk and her senior staff to maintain substantial compliance.

JANUARY 2025 SEMI-ANNUAL REPORT

Employment Plan Amendment

My Office works with HR to review and maintain the exhibits associated with the Plan. During this reporting period, the following update was requested:

Actively Recruited Positions List: Senior Publication, Digital & Multimedia Coordinator position was approved to be added to the list.

Employment Plan Training and Supplemental Policies Training

The Clerk's Office must provide comprehensive mandatory Employment Plan training to all employees, supervisors/interviews and Executive Staff, to ensure they are aware of and knowledgeable of the Employment Plan as well as their role in the hiring process. Employees receive such training within 60 days of employment or promotion, and on an annual basis thereafter. From July 1, 2024 through December 31, 2024, trainings were conducted both in-person and electronically, through the Learning Management System (LMS).

128 new employees attended in-person Employment Plan and Supplemental Policies Manual Training during New Employee Orientation and 11 new supervisors and/or interviewers completed Supervisor/Interviewer Training. Supervisors received annual EP training electronically through LMS.

Annual All-Employee Employment Plan, Supplemental Policies Manual and Supervisor/Interviewer Trainings are on-going.

Quarterly Employment Action Reports

The HR website is current through the fourth quarter of 2024 with reports that reflect the total number of hires, promotions, transfers and terminations by department, including designations of Exempt positions.

Unlawful Political Discrimination (UPD)

No complaints of UPD were filed or reported.

Political Contacts

Four political contacts were reported to the DOC. Three of which regarded conversations with Cook County Circuit Court Judges explaining the process of rotating Circuit Court Clerks. Additionally, a recommendation letter was sent on behalf of a Circuit Court Clerk. The political contacts were not unlawful and were more akin to speaking on behalf of the Court Clerks' skills, experience and abilities.

The fourth contact involved a representative from an elected official's office forwarding an inquiry from a constituent about job opportunities to a Clerk's Office employee during a community outreach event. Although the constituent's resume and contact information were included in the forwarded inquiry, this political contact was not an unlawful political contact as it was not a direct request from the organization for any employment action specific to the Clerk's Office but more akin to a request for information regarding opportunities in general. At my direction, HR contacted the constituent and provided information on how to access the Clerk's website. **I recommend HR's presence at community hiring events to serve as a resource to staff and prospective applicants.**

Policies

Policies which were reviewed during this time include the Probationary Performance Evaluation Policy and the Telework Policy (and their respective forms). These will be addressed further in the next DOC's Report. No additional EP or Handbook policies were finalized during this reporting period.

Violations of EP

Violations of the EP and/or Supplemental Policies Manual (SPM) were reported or discovered during this time period. They will be addressed specifically below.

Auditing/Review Activities

A. Shakman Exempt Hiring Packets:

During this reporting period, my Office conducted an audit of the Shakman Exempt Hiring Packets in the Electronic Application System ("EAS" or "Taleo") to ensure compliance with Section XII. Exempt Position Hiring Process of the Employment Plan. On December 20, 2024, my Office issued a Report, noting the following common issue:

1. Many employees did not have Taleo profiles or had incomplete Taleo profiles.

I recommended that HR follow their standard practices for uploading respective hiring documents into employees' profiles and instruct employees who did not have Taleo profiles to immediately create one.

B. Executive Assistant Hiring Packets:

During this reporting period, my Office conducted an audit of Executive Assistant Hiring Packets located in the Electronic Application System ("EAS" or "Taleo") to ensure compliance with Section XIII. Executive Assistant Hiring Process of the Employment Plan. The December 20, 2024 Report noted the following issues:

1. Some employees did not have Taleo profiles or had incomplete Taleo profiles; and
2. One (1) position was missing the Taleo requisition.

I recommended that HR create Taleo requisitions for all missing Executive Assistant titles, follow their standard practices for uploading respective hiring packets into employees' profiles and instruct employees who did not have Taleo profiles to immediately create one.

C. Posting File Audit:

During this reporting period, my Office initiated an audit of the posting files after completion of the hiring cycle. 30 areas on the Posting File/Interview File Checklist, tied to the hiring steps, were examined along with the required documentation that must be housed in the files.

Issues are addressed individually by posted position below.

Posted Positions

The Clerk's Office closed 10 positions during this reporting period. They will be addressed individually below.

Accounts Payable Specialist

The position was properly posted with 1 vacancy under the General Hiring Process. The DOC reviewed and verified randomization and sorting. The DOC validated 128 applications and came to agreement with HR on its validation resulting in 80 eligible candidates. Per the Employment Plan, 10 candidates were added to the Interview List in the order of appearance on the Validated Eligibility List. The interview process occurred with the DOC monitoring 4 interviews. Prior to the Ranking Meeting, HR brought to my attention errors with an Interviewer Evaluation Form that included a comment that could be perceived to be about a candidate. After my review and conferral with the CHRO, HR reviewed Interview process best practices with the panel member. There was no discernable impact in the final results. The Ranking Meeting occurred without issue, where the Interview Panel ranked 1 candidate. The top ranked candidate accepted the position.

The following issues were identified with the Posting File:

1. Interviewer Evaluation Forms were missing panelist's initials where scores were altered; and

2. The Candidate's High School Diploma is missing from the File.

Administrative Assistant IV

This position was discussed in the last Report. The position was properly posted with 1 vacancy. Subsequently, 4 additional vacancies were approved and filled under the General Hiring Process. The next highest ranked candidates from the final ranked list dated December 5, 2023, were selected to fill the 4 vacancies. The selected candidates accepted the positions. No issues were identified with this sequence. The Posting File is complete.

Archivist

This position was discussed in the last Report. The position was properly posted with 1 vacancy. Subsequently, 1 additional vacancy was approved and filled under the General Hiring Process. The next highest ranked candidate from the final ranked list dated June 11, 2024 was selected to fill the additional vacancy. The selected candidate accepted the position. No issues were identified with this sequence. The Posting File is complete.

Assistant Operations Manager

This position was discussed in the last Report. The position was properly posted with 19 vacancies under the General Hiring Process. The DOC reviewed and verified randomization and sorting. The DOC randomly validated applicants out of 208 applications and came to agreement with HR on its validation resulting in 80 eligible candidates. Interviews were held over multiple days and split between three panels. The interview process occurred without issue with the DOC monitoring 54 interviews and all Ranking Meetings. Each panel held its own ranking meeting to determine whether a candidate should be remain on the Ranked Eligibility List. Once all ranking meetings concluded, HR combined all Ranked Eligibility List into one master list and sorted candidates by overall average interview scores. In the case of those candidates with the same score, the date and time of the submitted application was used to determine ranked order. Thirty five (35) candidates were ranked. The 19 top ranked candidates received offers and of those, 12 accepted. The next highest ranked candidates received the remaining offers until all positions had been filled. Five (5) candidates remain on the Ranking List which is valid through September 17, 2025.

The following issues were identified with the Posting File:

1. Interview File Checklist is incomplete;
2. Interviewer Evaluation Forms are missing panelist's initials where scores were altered; and
3. Interviewer Evaluation Forms are missing the candidate's response.

Desktop Support Technician

This position was discussed in the last Report. The position was properly posted with 1 vacancy under the General Hiring Process. The DOC reviewed and verified randomization and sorting and validated 62 applications and came to agreement with HR on its validating resulting in 19 eligible candidates. The interview process occurred without issue with the DOC monitoring 7 interviews. During the Ranking Meeting, the Interview Panel ranked 4 candidates. The top ranked candidate accepted the position. No issues were identified with this sequence. The Posting File is complete.

Financial Clerk

This position was discussed in the last Report. The position was properly posted with 17 vacancies under the Entry Level Bargaining Unit Process. At the time of the last report, 10 out of the 17

positions were filled. Subsequently, 3 additional vacancies were approved and filled under the General Hiring Process. The remaining vacancies have since been filled. The Posting File is complete.

Office Clerk

This position was discussed in the last Report. The position was properly posted under the Entry Level Bargaining Unit Process. The DOC reviewed and verified randomization and sorting. The DOC randomly validated applicants out of 844 applications and came to agreement with HR on its validation resulting in 336 eligible candidates. Conditional offers of employment were made directly from the Validated Eligibility List. To date, 115 positions have been filled. No issues were identified with the sequence. The Posting File is complete.

Operations Manager (00134056)

The position was properly posted with 8 vacancies under the General Hiring Process. The DOC reviewed and verified randomization and sorting. The DOC randomly validated applicants out of 208 applications and came to agreement with HR on its validation resulting in 68 eligible candidates. Interviews were held over multiple days and spilt between three panels. The interview process occurred without issue with the DOC monitoring 33 interviews and all Ranking Meetings. Each panel held its own ranking meeting to determine whether a candidate should remain on the Ranked Eligibility List and once all ranking meetings occurred, HR combined all three lists into one master and sorted it by overall average interview scores. In the case of those candidates who have the same score, the date and time of the submitted application was used to determine ranked order. 17 candidates were ranked. The top ranked candidates received offers and of those, 6 accepted. The next highest ranked candidates received the remaining offers until all positions had been filled. 1 candidate remains on the Ranking List which is valid through July 15, 2025.

The following issues were identified with the Posting File:

1. Interviewer Evaluation Forms are missing comments for scores of 1;
2. Interviewer Evaluation Forms were missing panelist's initials where scores were altered; and
3. Interviewer Evaluation Forms are missing the candidate's response.

Platform Administrator

This position was discussed in the last Report. The position was properly posted with 1 vacancy under the General Hiring Process. The DOC reviewed and verified randomization and sorting and validated 26 applications and came to agreement with HR on its validating resulting in 7 eligible candidates. The interview process occurred without issue with the DOC monitoring 5 interviews.

Four (4) candidates scored below 3.0 and therefore, not eligible to be ranked. During the Ranking Meeting, the Interview Panel ranked 1 candidate. The ranked candidate accepted the position.

The following issue was identified with the Posting File:

1. Signed NPCC is missing.

Senior Security Investigator

This position was discussed in the last Report. The position was properly posted with one vacancy under the General Hiring Process. The DOC validated 8 applications and came to an agreement with HR on its validation resulting in 4 eligible candidates. The interview process occurred without issue with the DOC monitoring 2 interviews. Both candidates scored below 3.0 and therefor, not eligible to be ranked. No issues were identified with this sequence. The Posting File is complete.

I recommended that HR quality control Interviewer Evaluation Forms by reviewing each form upon receipt and immediately return any incomplete or improperly completed form to the interview panelist prior to scoring and follow their standard practices for uploading respective hiring related documents into the Posting Files.

Lateral Transfers

Two lateral transfer opportunities were posted for Circuit Court Clerk (2024-L4) and Office and Financial Clerk (2024-L5).

2024-L4 Circuit Court Clerk (*July 29, 2024 – August 4, 2024*). Fifty-five (55) applications were submitted, 4 of which were duplicates, 10 of which were submitted by probationary employees, and 11 of which were submitted by employees who did not hold the correct title, resulting in 30 eligible candidates. Thirty (30) eligible candidates were offered the lateral transfer, solely based on seniority, with 13 employees accepting offers. No issues were identified with this sequence, and the Posting File is complete.

2024-L5 Office and Financial Clerk *(October 2, 2024 – October 8, 2024).* Forty-three applications were submitted, 6 of which were duplicates, 16 of which were submitted by probationary employees, 1 of which was submitted by an employee who was deemed ineligible based on disciplinary record, 1 of which submitted by an employee who later resigned, and 1 of which was submitted by an employee who did not hold the correct title, resulting in 18 eligible candidates. Initially, 18 eligible candidates were offered the lateral transfer, solely based on seniority, with 7 employees accepting offers**.** A discrepancy was identified in the lateral offers for the 2024-L5 Office and Financial Clerk positions. Specifically, Office Clerk vacancies in suburban locations did not include complete department information. As a result, the offers made were invalid. Offers were rescheduled and made to 18 eligible candidates in seniority order, with 8 employees accepting offers. The Posting File is complete.

Promotions

One promotional opportunity was posted for Circuit Court Clerk (2024-P3).

2024-P3 Circuit Court Clerk (August 29, 2024 – September 5, 2024). 103 applications were submitted during the posting period. The Promotional posting was subsequently revised due to incorrectly listed vacancies. A vacancy under Criminal at the Daley Center was listed, however this should have been listed as Civil Department. In addition, there were two vacancies listed within Civil at Markham which should have been one at Civil and one in Criminal. The posting was reopened September 16, 2024 through Tuesday, September 17, 2024. An additional 38 applications were submitted during this posting period resulting in a total of 141 submitted applications. 19 of which were duplicates, 4 of which were submitted by probationary employees, 1 of which submitted by an employee who did not hold the correct title, 1 of which submitted by a candidate who was not employed by the Clerk of the Circuit Court, and 2 of which deemed ineligible based on disciplinary record, resulting in 114 eligible candidates. 64 eligible candidates were offered the promotion, solely based on seniority, with 28 employees accepting offers. The Posting File is complete.

Exempt List and Exempt Job Descriptions

No changes were proposed by the Clerk's Office to be made to the Exempt List.

Exempt Hiring

51 Shakman exempt employees were appointed during this time period, including Clerk of the Circuit Court; Executive Assistant to the Clerk; Chief of Staff; Senior Policy Advisor; Executive Clerk, CIO; Executive Clerk, External Affairs; Executive Clerk, GC; Executive Clerk, CFO; Associate Clerk/Deputy CHRO, HR Administration; Associate Clerk, Public Information Officer; Deputy Public Information Officer; Intergovernmental Affairs Officer; Director of Accounting/Auditing; Budget Director; Director of Project Management Office; Deputy Chief Information Officer; Chief Investigator; Deputy General Counsel (2); Associate Clerk, 1st Municipal/Probate/County; Associate Clerk, Records and Facilities Management; Associate Clerk, District 3; CDC, Courtroom Management; CDC, Probate; CDC, Expungement Department; CDC Domestic Violence; CDC, Criminal Department; Investigator/Security Detail Officer; ACDC, District 3; ACDC, County Division; ACDC, Traffic; ACDC, Probate; ACDC, Family/Chancery/Traffic; CDC, Domestic Relations; Director of Infrastructure; Facilities Management Project Manager; CDC, District 2 (Skokie); CDC, Chancery Division; CDC, Records Storage and Digital Imaging Center; Director of Procurement; ACDC, Criminal Department; Deputy Director of Payroll.

Though there is broad discretion to fill these positions and an open competitive process is not required, appointees must meet all minimum qualifications contained in the applicable job description. Once a candidate has been identified for hire, HR reviews the application materials to verify that the selected candidate is eligible and sends notice of the selected candidate with all required documents (job description, application, resume, etc.) to the DOC for review. This

collection of documents provides the opportunity for both offices to evaluate the candidate's qualifications and raise any concerns before the selectee is hired. Because there is an expectation that the CHRO (or Designee) and/or DOC will raise any concerns within a short timeframe following receipt (so that the hiring process of eligible candidates may proceed without delay), we prioritize review immediately upon receipt.

The following non-compliance and/or administrative concerns were identified:

1. In violation of the Plan, the Clerk's Office did not provide proper notice to the DOC for some of the applicants selected for appointment pursuant to Section XII. In those instances, applicants were appointed without prior review of their qualifications by the CHRO (or Designee), and/or the DOC. Subsequently, HR and I confirmed that applicants met the minimum qualifications required of their respective positions. Taking into consideration that an administrative transition occurred during this reporting period, I worked with HR to review applicant materials 'piecemeal' upon receipt to expedite the appointment process and avoid a negative operational impact. Moving forward, and with the DCHRO in place, I anticipate that the standard process for review and approval will resume.

2. One appointee is a current employee who was the subject of an OIG investigation that resulted in sustained violations of the Clerk's Code of Ethics. In a requested meeting with the DCHRO, I articulated my concerns about the appointee and the matter remains under review. **While the Plan does not require a review of an internal applicant's/appointee's disciplinary history prior to appointment, I recommend that such a review, at minimum, by the CHRO (or DCHRO) occur to identify and mitigate potential issues that may cause disruptions in the workplace.**

Executive Assistant Hiring

6 Executive Assistants were appointed during this time period. Of these, 4 were current employees transferred within the same title. HR submitted notifications for 2 Executive Assistants pursuant to Section XIII of the Plan. I did not identify any concerns with any of the selections.

Ineligible for Hire/Rehire List

Former employees and candidates deemed disqualified or ineligible for employment due to reasons listed in Section IV. R.1 Ineligible for Hire/Rehire List are placed on an Ineligible for Hire/Rehire List (List). Individuals on the List are not allowed to move forward in the hiring process, whether the position is Non-Exempt or Exempt.

As published in the last Report, on April 23, 2024, HR updated its Ineligible for Hire/Rehire List and sent out notifications to 22 impacted individuals. I reviewed pertinent documents regarding the 17 individuals who did not appeal and recommended the removal of 3 individuals from the List. The Chief of Staff concurred with this recommendation. Ineligible for Hire/Rehire List appeals occurred during the current reporting period. Of the 5 individuals who appealed, I

recommended the removal of 3 from the List. The Chief of Staff concurred with this recommendation for 2 individuals, while 1 individual remained on the list.

On November 8, 2024, 1 individual was placed on the List and has filed a timely appeal. This will be addressed further in the next DOC's Report.

Aside from the formal appeal process, 2 individuals who were placed on the List in 2021 advocated for an early removal from the List. There is no provision in the Plan for an individual's removal from the List prior to the 5 year period. The Plan allows those added to the List to appeal the determination after receiving notice of their inclusion on the List within 30 days of the date of notice. If an appeal is not received within 30 days of the date of notice the individual shall have waived his/her right to appeal a decision. I reviewed available documentation confirming that the individuals received the proper notice and no appeals were filed within the requisite 30-day period. Upon review of the documentation presented and in consultation with the CHRO, I recommended that the individuals remain on the List. The Chief of Staff agreed with my recommendations and both individuals remain on the List.

Investigations

Complaints under my authority to investigate include alleged violations of the Employment Plan, Supplemental Policies, Unlawful Political Discrimination and Unlawful Political Contacts. The DOC may coordinate with the CHRO or Designee and/or the Clerk's Office OIG or Designee on further investigation of the alleged violation. At the conclusion of the investigation, the DOC shall prepare a DOC Investigation Report and provide copies to the Clerk, COS, CHRO or Designee and OIG. The following Investigation Report was issued this reporting period:

Complaint # 2024-000103: resulted in a finding that an employee did not engage in unlawful political activity when showing a photo taken with a political candidate on their personal cell phone during working hours and displaying the photo on their County computer screen as a screensaver. It was sustained that the employee's actions violated the Clerk's Office's General Rules and Regulations, Code of Ethics and Electronic Communications, Technology and Social Media Policy.

I recommended the employee be held responsible for listed violations and be issued discipline as deemed appropriate. The Chief Human Resources Officer agreed with my recommendation. This matter is considered closed.

Second Step Grievance Hearings

I monitored 6 Second-Step Grievance Hearings covering 33 employees during this reporting period and did not observe any discrepancies during the monitored hearings with respect to following written procedures.

Position Descriptions

I reviewed and provided feedback on 2 position descriptions during this time. Consistent with the EP, the Clerk's Office welcomed feedback and proposed revisions from the DOC.

Probationary Performance Evaluations

The Probationary Performance Evaluation Policy requires the CDC or Designee to use personal knowledge of a Probationary Employee's work performance to complete a Probationary Performance Evaluation Form for a Probationary Employee whom the CDC or Designee supervises for work performed during the employee's Probationary Period.

During this reporting period, I reviewed 180 Probationary Performance Evaluations. Previously, I provided real time alerts of any issues to supervisors, and HR, as well as instructions on how to correct errors identified, however, with HR taking better control of the probationary performance evaluation process, the Clerk's Office's last several rounds of probationary performance evaluations have greatly improved. HR has implemented a better tracking system of period end dates, sends timely reminders to supervisors, communicates with supervisors about the policy requirements, reminds supervisors to provide a Teams link for monitoring and consistently follows up with supervisors regarding missing evaluations. Although there has been improvement with the timely receipt and quality of the evaluations, some probationary performance evaluation forms, NPCC's and /or NEA's are either incomplete or incorrectly completed, to include incorrect Total and/or Average scores, missing supervisor(s) and/or employee signature and either missing dates or incorrect dates.

Of note, is that many supervisors either provide the same generic comments for each employee or do not include recommendations to improve performance. This practice can lead to inadequate performance management. While HR continues to quality control submitted evaluations and provide feedback to supervisors on how to complete the Probationary Performance Evaluation Forms in line with the Policy, it is desired that the CDC or Designee perform a quality audit on evaluations, ensuring that each employee is adequately evaluated prior to submission to HR and/or the DOC for review. **I recommend refresher training on the Policy for all Court Operations supervisory staff.**

Reclassification

The Clerk's Office processed one reclassification. Operational justification indicated that the employee had been performing the duties on a daily basis for a period of approximately 17.5 years. The justified request was approved by the CHRO.

Notices of Employment Action

I reviewed over 550 original and revised NEA's for a number of employment actions, including but not limited to, terminations, temporary assignments, transfers, disciplines, new hires, work schedule changes, trainings, promotions, and permanent placements.

The majority of NEA's are being sent to the DOC in a timely manner, however there are instances in which the notice is sent weeks, and in one case, months after the action(s) have occurred. Additionally, many NEA's are either incomplete or incorrectly completed. HR does a good job of reviewing and returning erroneous NEA's to supervisors, however it is desired that management review and correct NEA's prior to submission to HR. **Consistent with the previous DOC's reports, I recommend that HR continue to remind supervisors that NEA's must be submitted on a timely basis in accordance with the EP and that discipline be imposed on supervisors who continue to miss deadlines.**

Additional Recommendations

HR is committed to the EP and has implemented all recommendations from the last Report.

- **Recommendations for areas of concern are provided within the Report however, a risk assessment, and resultant Risk Management Plan, is needed.**
- **HR conduct pre-interview meetings with hiring managers to review the interview process prior to interviews for *all* General and Actively Recruited positions. The pre-interview meeting is a useful tool ensure an effective interview process. HR held pre-interview meetings with hiring managers for select, high volume positions requiring multiple and simultaneous interview panels, and detailed the interview process, to include completion of requisite documents, lead panelist responsibilities, other panelist responsibilities and process timelines. The meetings were of great benefit as they provided clarity for newer interviewers and refreshed the process for others.**
- **In addition to refresher training on the Probationary Performance Evaluation Policy, Court Operations needs to work with HR to thoroughly assess training needs, create and implement a comprehensive training plan and track training for staff at all levels.**

Meetings

I have established bi-weekly meetings with the Chief of Staff, to discuss the Compliance Program and any issues that may need attention to ensure the Program is effective. Additionally, I meet with the CHRO and/or DCHRO on all facets of the Program. As needed, I meet with the Inspector General and Ethics Officer regarding all aspects of the Employment Plan, including complaints and investigations.

Conclusion

In sum, although there were occasions where mistakes were made and errors needed correction during the hiring processes, there was no observed pattern of intentional noncompliance with the Plan and the Compliance Program continues to be effective.

HR worked with the departments when errors were made and reported violations to my office when more concerning issues arose. Additionally, employees from various departments contacted my Office for assistance with questions or clarification of issues related to the Plan.

I will continue to work collaboratively with HR and other Clerk's Office leaders to support compliance. As always, I am appreciative of with the assistance and collaboration received as I carry out my compliance related activities.