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September 15, 2016

Mr. Joseph Berrios  
Assessor  
Cook County Assessor's Office  
118 North Clark Street  
Chicago, IL 60602

Mr. Roger Fross  
Locke Lord LLP  
111 South Wacker Drive, Suite 4100  
Chicago, IL 60606

Ms. Susan Feibus  
Assessor Compliance Administrator  
70 West Madison, Suite 3500  
Chicago, IL 60602

Mr. Brian Hays  
Locke Lord LLP  
111 South Wacker Drive, Suite 4100  
Chicago, IL 60606

**Re: September 2016 Semi-Annual Report**

Dear Assessor Berrios, Mr. Fross, Mr. Hays and Ms. Feibus:

This is the second semi-annual report of the undersigned Director of Compliance issued pursuant to Section V, Part B of the Employment Plan. The focus of the Assessor's Office during the period of time covering this second report has been on the posting and filling of vacancies and on the finalization of the Employment Plan. My goal remains the same - to work cooperatively with the Assessor Compliance Administrator and the Cook County Assessor's Office in taking the steps necessary to achieve Substantial Compliance.

**Employment Plan:**

On August 10, 2016, the Employment Plan was entered by the Court. The Director of Compliance provided suggestions on revisions to the Employment Plan to both Plaintiff's counsel and the State's Attorney's Office prior to finalization based on observations of the General Hiring Process. These suggestions were received and changes to the Employment Plan were made accordingly. The finalization of the Employment Plan is an important first step on the road to Substantial Compliance, provides a set framework for compliance, and eliminates confusion over the draft of the Plan under which the Assessor's Office was operating.

## General Hiring Process –

A majority of the Director of Compliance's time and the resources of the Assessor Compliance Administrator have been spent working with the Assessor's Office on the General Hiring Process and compliance with the Employment Plan.

The Assessor's Office conducted interviews for the following positions pursuant to posted Job Opportunity Notices: Director of Field Operations, Freedom of Information Specialist, Manager of Taxpayer Information, Assessment Operations Support Staff, Taxpayer Services Support Staff, Taxpayer Information Specialist, Erroneous Exemption Specialist, Residential Field Workflow Coordinator, Assistant Manager Technical Review, Division Junior Analyst, Technical Review Specialist, Technical Review Industrial/Commercial Analyst, Industrial/Commercial Valuations Junior Analyst, Industrial/Commercial Junior Field Inspector, Systems Analyst, Manager Technical Review, Taxpayer Information Senior Specialist, Taxpayer Advocate Analyst, Industrial/Commercial Valuations Group Leader, and Residential Junior Analyst. Position Descriptions and Interview Questions were reviewed by the Director of Compliance and the Assessor Compliance Administrator and many suggestions were incorporated by the Assessor's Office. Two offers were declined and the Systems Analyst and Industrial/Commercial Group Leader positions were reposted. The Assessor's Office also reposted the Erroneous Exemption position due to a selected Candidate being unable to start by the designated start date.

The process itself was inconsistent. Some issues arising during this process were:

- Validator notes incomplete on the validation sheets. Both the Director of Compliance and the Assessor Compliance Administrator have discussed this issue with Human Resources and requested that complete information be filled in on the note section specifying the reason for verifying/not verifying that a candidate possesses a Minimum Qualification or Preferred Qualification. This ensures consistency in the process, transparency and provides specific information as to the rationale of the validator.
- Lack of a consistent structure to instructions given to Candidates prior to the interview. The same opening statement regarding instructions for the interview was not given to all candidates. While the substance was similar, the wording and actual content varied from Candidate to Candidate. Standard opening instructions were drafted to be read to all candidates.

- Documentation from Candidates not being collected or reviewed prior to the interview to validate that the Candidate met the minimum requirements for the position (i.e. college transcript tendered did not demonstrate that the Candidate possessed a Bachelor's Degree). The Human Resources Department representative will not only collect the information but also carefully review the information provided prior to seating the Candidate for the interview.
- Ranking Meeting discussions not progressing in accordance with the Employment Plan. Candidates were not discussed in the order they appeared on the Scored Interview List and, in one instance, the Human Resources representative advised the panel that they were discussing one Candidate but the materials for a different Candidate were distributed to the panel. These issues were addressed and the Human Resources Department representative will review the Scored Interview List and order the materials for discussion prior to the Ranking Meeting.
- Interview Panel members failing to complete the Evaluation Forms. Interview Panel Members raising information outside of the hiring process and not providing the basis or bases on which Candidates were not ranked in the Ranking Meeting. Both pre and post interview instructions reinforcing the principles of the Employment Plan with the Interview Panels were developed and implemented.
- An Interview Panel Member leaving the interview room prior to the completion of a Candidate's interview during the portion of the interview where the Candidate has the opportunity to ask questions. This issue was addressed in the pre-interview instructions given to all Interview Panel Members, and will be reinforced through training.
- Scoring tabulation worksheets containing incorrect scores as transferred from the Interviewer Evaluation Forms and incorrect calculations of candidate final average scores. These issues have been addressed through the development of an Excel program which prevents overwrite and with the Director of Compliance performing a check for accuracy on the information contained in the scoring tabulation worksheet.

The Assessor's Office has been receptive to comment and suggestions, and has taken remedial steps to improve the process. The Industrial/Commercial Valuations Junior Analyst position, which were the last interviews held by the Assessor's Office prior to this Report, demonstrated an improvement with Employment Plan compliance.

Job Opportunity Notices were posted for the following positions: Taxpayer Information Junior Specialist (Spanish and Polish), Manager Appraisal Review and Education, Manager of Certificate of Error, Manager of Application Development, Manager of Exemption Investigations Unit, Manager Industrial/Commercial Valuations, Financial Operations Coordinator (position withdrawn), and Landmarks Analyst.

Three of these positions were reposts based on comments regarding qualifications for the position: Landmarks Analyst, Manager of Exemptions Investigations and Manager of Application Development. In one instance, the position was reposted based on a minimum qualification that unduly limited the applicant pool. Interviews for positions will resume once Supervisor/Interviewer Training on the Employment Plan has been completed.

#### Personnel Files -

The Director of Compliance became aware that employee personnel information was being stored in two locations in the Assessor's Office. The Employment Plan is clear that only one set of personnel files are to be maintained by the Assessor's Office and these personnel files are to be located in the Human Resources Department. The Director of Compliance met with the Chief Deputy Assessor and the Deputy of Human Resources regarding personnel files, recommended that the files be merged and stored in Human Resources, and was assured that the Assessor's Office would review the situation and take appropriate action. Personnel related information is now being transferred to the Human Resources Department for assimilation into the employee personnel files maintained in the Human Resources Department.

#### Employment Actions-

The tendering of Notices regarding Employment Actions to the Assessor Compliance Administrator and the Director of Compliance in accordance with the Employment Plan has not occurred on a regular basis. While most of the employment actions involve the assignment of overtime within the Assessor's Office, the employment actions have not been regularly tendered for review. In addition, in one instance, the Office did not provide Notice when an employee was returned to paid status following an unpaid administrative leave of absence. This Notice was only provided after it was requested by the Director of Compliance. Discussions have occurred with the Acting Deputy of Human Resources regarding the requirement that Employment Action Notices be provided no less than two days prior except where circumstances outside the control of the Assessor's office preclude such advance notice.

The Assessor's Office has acknowledged the lapse in communicating Employment Actions to the Assessor Compliance Administrator and the Director of Compliance and has taken remedial steps. First, the Office has set up a File Transfer Protocol (FTP) site to download all Notices and has provided the Assessor Compliance Administrator and the Director of Compliance access to the site. Second, the requirement that Notice be provided in accordance with the Employment Plan has been emphasized with all Deputies, Managers and Supervisors both at a meeting and through email communication. Third, the duties of supervisors under the Employment Plan will be addressed in the training program for Interviewers/Supervisors.

#### Interview/Posting Files –

A review of the Interview/Posting Files for the posted positions revealed that all necessary information had not been placed in the files. The matter has been discussed with the Human Resources Director and Acting Deputy of Human Resources. The Director is in the process of organizing and completing the files. Prior to the issuance of employment offers for the Industrial/Commercial Valuations Junior Analyst positions, the Interview/Posting File was reviewed. This file was complete and an internal Method and Location of Posting form was developed to document the posting information.

#### Training –

With the finalization of the Employment Plan, I worked with Human Resources in the development of a new training program for Interviewers/Supervisors. This training not only addresses the General Hiring Process but also focuses on supervisor responsibilities under the Employment Plan. The Assessor Compliance Administrator provided organizational suggestions and substantive comments on the training and these comments are being carefully reviewed. The supervisor training is anticipated to begin shortly, and will be completed prior to the continuation of interviews for previously posted positions.

Employment Plan training for employees is currently being developed.

#### Employee Handbook:

With the finalization of the Employment Plan, the next focus of the Assessor's Office is on the development of a comprehensive Employee Handbook. Written policies and procedures covering all aspects of employment with the Assessor's Office are needed as a prerequisite to substantial compliance. The Assessor's Office has provided drafts of a Performance Evaluation Policy and a Promotion Policy. Comment has been received by the Assessor's Office and new drafts are in process.

#### Meetings:

I have continued to meet with the Chief Deputy Assessor, Deputy of Human Resources, Director of Human Resources and Legal Counsel. All have remained available as needed and cooperative in responding to requests. I have also met with employees and remained available to discuss the Employment Plan and questions and concerns about the General Hiring Process.

Complaints/Unlawful Political Discrimination:

No complaints have been received by the Director of Compliance.

Political Contacts:

No reports of Political Contact have been received by the Director of Compliance.

Monitoring:

Disciplinary Actions -

The issuance of discipline to employees based on infractions of the Time and Attendance Policy was monitored. I previously reported that the meetings would benefit from a more formal process and should occur on a more regular basis. While more information is provided to employees during the meetings, updated infraction letters need to be implemented as current letters do not always accurately reflect the type of infraction as set forth in the policy. New draft templates that accurately reflect the type of infraction as listed in the policy have been developed. However, infraction meetings are still not occurring on a regular basis.

A disciplinary meeting pertaining to the work-related conduct of an employee was also monitored. The union was invited to the meeting and attended as the meeting was investigatory in nature. No irregularities in the process were noted.

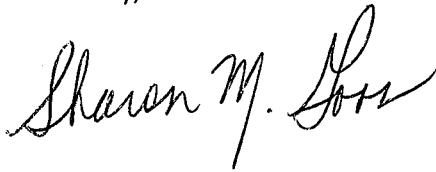
Grievances –

I also had the opportunity to monitor a Step 1 union grievance pertaining wherein the grievant alleged that that his application for a position was not considered in violation of the collective bargaining agreement. The process proceeded appropriately with both management and the union being afforded an opportunity to present their respective positions. The grievance was denied and has been advanced to Step 2 of the grievance procedure pursuant to the provisions of the collective bargaining agreement.

Conclusion:

The finalization of the Employment Plan provides a framework for achieving Substantial Compliance. There is understanding that there must be a focus on the details of the Plan and compliance with each element. I continue to look forward to working with the Cook County Assessor's Office and the Assessor Compliance Administrator in a cooperative effort to reach this goal.

Sincerely,

A handwritten signature in cursive script that reads "Sharon M. Goss". The signature is written in black ink and is positioned to the left of the typed name.

Sharon M. Goss  
Director of Compliance  
Cook County Assessor's Office

cc: Jeffrey Cox