



Matthew Serio, Director of Compliance (DOC) for the Cook County Assessor's Office (CCAO), respectfully submits this Semi-Annual Report pursuant to Section V(B) of the [Employment Plan](#). As required by this section of the Employment Plan, this Semi-Annual report will also be posted and made publically available on the Cook County Assessor's Office [website](#).

I. Introduction

About the DOC

This is the first semi-annual report issued by the current DOC. I began my role as the DOC for the CCAO on April 29, 2019. Prior to taking on the role of DOC, I was a Chief Investigator for the City of Chicago's Office of Inspector General, an independent, apolitical watchdog for City government. While in that role, I led a variety of internal investigations and compliance reviews – many of which dealt with employment actions. Prior to working as a Chief Investigator with the OIG, I was an Investigator with my own caseload. At the time I worked as an Investigator with the OIG, the City was under Shakman oversight.¹ Some of my cases dealt with violations of the provisions of the Shakman consent decrees. While I worked as an Investigator for the OIG, I attended law school and obtained my JD. Before taking on the role of Chief Investigator, I worked as an Assistant State's Attorney for the Cook County State's Attorney's Office.

I look forward to leveraging all of my knowledge, skills, and experience in the DOC role and helping the Assessor's Office build a more transparent, efficient, ethical, and compliant organization.

II. Role of the DOC

The DOC's primary responsibilities include, but are not limited to, the following:

1. Understanding the Assessor's Office's organization, its business, and operational objectives and needs, and its staffing needs

I spent much of my first months focusing on this first responsibility. After familiarizing myself with the Assessor's Office organizational chart, I met with several departmental Deputies. From these meetings, I garnered a baseline understanding of the responsibilities of each department. In the coming months, I plan on meeting with supervisors and frontline employees to gain their perspectives on the operational objectives of the CCAO. Different departments also have standing meetings that I plan on attending to better learn their operational objectives and needs.

2. Overseeing Compliance with the Employment Plan

¹ In June 2014, the City of Chicago was found to be in substantial compliance with the consent decree and removed from federal court oversight.



The Employment Plan contemplates six different hiring processes: the General Hiring Process, the Actively Recruited Hiring Process, the Exempt Hiring Process, the Executive Assistant Hiring Process, Onboarding of Interns/Externs, and the DOC Hiring Process. I have had an opportunity to monitor and evaluate all of these processes, with the obvious exception of the DOC Hiring Process. While there have been minor instances of non-compliance described below, I am confident that the Assessor's Office is committed to having fair and equitable hiring processes in accordance with the spirit of the Employment Plan.

As a new DOC, I spent a considerable amount of time familiarizing myself with the Employment Plan. I assisted in providing edits and comments to the Plan. This is an ongoing process, as I believe there are procedures that can be streamlined while remaining in compliance with the original intent of the Plan. For example, the General Hiring Process is overly cumbersome and redundant in some areas requiring a good deal of workhours spent on unnecessary steps – costing time and money and needlessly prolonging the hiring sequence.

3. Working with the Chief Administrative Officer and the Director of HR in developing strategies for the Employment Plan as well as any necessary policies and procedures to ensure compliance with the Employment Plan

In the last few months, I worked closely with the Chief Administrative Office and HR to revise the CCAO Employee Handbook. These were the first revisions to this Handbook in approximately seven years, and in some areas they were substantial. The Assessor's Office is currently in the process of providing a comprehensive, three-day training on the new Handbook for all employees and a fourth day for managers. As the DOC, I am actively monitoring and facilitating these training sessions.

To foster compliance with the Employment Plan, I have also created and presented training material for HR on the process by which the office validates job applicants. The processes that the Assessor's Office utilizes to post for a position, select candidates to interview, and select the incumbent must be fair and uniformed. This necessitates a meticulous vetting or validation process. To clarify these procedures, I created a training to assist HR in understating these somewhat nuanced policies.

4. Accepting, investigating, and reporting on complaints related to the Employment Plan and policies in the Employee Handbook

During this reporting period, I received one complaint that alleged a potential violation of the Employment Plan. In summary, the complaint alleged that a manager hindered a subordinate employee's ability to fulfill one or more of that employee's essential job duties. The complainant also alleged that the manager had the employee and a coworker performing work outside the scope of their job duties. The ensuing investigation resulted in the DOC making a recommendation that the Assessor's Office consider drafting Standard Operating Procedures that would govern work processes so that managers and subordinate



employees have clear direction and understanding as to each other's responsibilities vis-à-vis each step in the process. The DOC made this finding and recommendation on September 11, 2019 and is awaiting the Assessor's Office response. The allegation that the manager had the employee and coworker performing work outside the scope of their job duties was not sustained. Due to understaffing and vacancies in other manager positions, the employee and coworker were being asked to do more work than usual, but it was more work within the realm of their essential duties, not different work.

5. Working with HR to implement training programs, prepare training materials, and conduct training for all Employees on the Employment Plan and policies in the Employee Handbook

Since starting in the office, I have monitored, drafted, or facilitated trainings on a variety of topics and subjects. Most notably, and as mentioned above, the Assessor's Office is currently training every employee on the newly revised Employee Handbook. As the DOC, I assisted in drafting the new Handbook, reviewed training materials, and helped implement the comprehensive training. This was a monumental task of which I only played a part, and the Assessor's Office deserves recognition for finalizing the Employee Handbook with input from a number of stakeholders, facilitating the training from a logistical standpoint, preparing the training materials, and ultimately presenting the training.

In addition to the above-mentioned Handbook training, I have also facilitated trainings on the Employment Plan and Shakman Compliance as well as training for Interviews on how to properly conduct a job interview in accordance with the Employment Plan. Training on the Employment Plan and Shakman Compliance is particularly important for newer employees, and with this being a relatively new administration there are many new employees. It is one thing to understand the Employment Plan and the numerous rules and regulations it creates. It is another thing to understand why the Plan is necessary and why the rules and regulations exist. This is a key component to attaining compliance. The Employment Plan and Shakman Compliance Training is geared towards providing that understanding.

As noted above, I also created training materials for HR on the proper protocol for validating job applications. The validation process is one part, albeit an important one, of the hiring process. In the next few months, and as the Employment Plan is revised and finalized, I hope to add to this training to encompass the entire hiring process.

6. Monitoring Activities pertaining to the employment of non-Exempt Positions, including, but not limited to, participation as required or as appropriate in validation, interviews, and Candidate selection meetings.

Since I started here, the Assessor's Office has hired a Senior HR Generalist (hired through the General Hiring Process); a Director of Training and Continuous Improvement (hired through the Actively Recruited



Process);² a Director of Human Resources, a Senior Data Scientist, a Legal Counsel, a Director of Outreach and Engagement, and two Directors of Communication (hired through the Exempt process);³ one Executive Assistant, and several interns. For the General Hiring Process, I actively engaged in the validation process, the randomization process, the interview process, and the selection processes. For the Actively Recruited Process, I actively engaged in the validation process, the candidate review process, the interview process, and the selection processes. For the Exempt and Executive Assistant processes, I actively engaged in the validation processes.

When I started, the Assessor's Office was not engaging in sufficient exit interviews. At the time, the "exit interview" for a departing employee consisted only of logistical matters and paperwork with no consideration towards getting that employee's in-depth perspectives on the Office as a whole. To remedy this, I created an Exit Interview Form for HR's use that asks questions geared towards getting a departing employee's candid, constructive feedback on his or her supervisory chain and general state of the Assessor's Office. In the future, I hope to leverage the information that the Office obtains in Exit Interviews to offer feedback to the Assessor and his deputies.

III. Requirements of this Semiannual Report

Section V(B) of the Employment Plan requires that this semiannual report include the following: (i) auditing activities as required by the Plan; (ii) discovered violations of the Employment Plan or policies in the Employee Handbook referenced in this Plan; (iii) complaints of Unlawful Political Considerations in Employment Actions referred to the OIIG; (iv) remedial actions recommended; and (v) corrective actions taken by the Assessor's Office to address the violations.

As DOC, I monitored approximately six desk audits within the office. After some time, I was able to gain full access to the Assessor's Office time and attendance system. I utilized that access to conduct informal, random spot checks on attendance issues. From that information, I gleaned that there are certain areas (e.g. Family Medical Leave Act, or FMLA) that are prone to abuse. In the future, I plan on conducting a more comprehensive audit on time and attendance, focusing on the use of paid time off.

With one exception, all violations of the Employment Plan that I have discovered in the last four or five months have been de minimis. These have included such things as gaps in the validation processes (hence the training described above), scoring candidates during an interview rather than after, and minor delays in raising potential conflicts of interest. All of which were corrected through the appropriate level of

² Actively Recruited Positions are high ranking or technical/professional related Positions for which discretion and flexibility in hiring are necessary, appropriate, and justifiable and the candidate's academic credentials or accumulated experience is an important determinant for the differentiation among candidates.

³ An Exempt Position is a position that involves policy making to an extent or is confidential in such a way that political party affiliation is an appropriate requirement for the effective performance of the job.



coaching and training. The one exception dealt with the Assessor's Office extending an invite to employees of other Cook County Departments to train on certain operations within the Assessor's Office. The purpose of this training was twofold: 1) to potentially receive assistance from other County employees during a time when the office anticipated a high volume of taxpayers coming into the office following the distribution of second installment tax bills, and 2) to provide those other County employees with a general knowledge about the processes of the Assessor's Office to better serve their customer base. While this invitation was made with good intentions, it did run afoul of the spirit of the Employment Plan. This was almost immediately flagged and the offer was rescinded. Since this incident, the Assessor's Office has taken steps to seek clarification from either myself, the Assessor Compliance Administrator, or both on actions it plans to take that may relate to the Employment Plan.

Since starting this role in late April, I have received no complaints of Unlawful Political Considerations in Employment Actions.

I have received one complaint of a potential violation of the Employment Plan. This complaint resulting an investigation (described in Section II.4 above), at the end of which I recommended policies be created to establish better lines of communication between employees and management. The results of that investigation and my recommendation were recently distributed on 9/11/19, and I await the Office's response as to what, if any corrective actions, it deems necessary.

IV. Substantial Compliance

On August 15, 2012, the Assessor's Office consented to the entry of an Agreed Order by the District Court. The Agreed Order for the Cook County Assessor's Office (found [here](#)) provides the framework for the Assessor's Office to implement additional policies and procedures to assure that all aspects of employment are free from unlawful political discrimination. In order to be removed from federal oversight, the Assessor's Office has the burden of showing that it is in Substantial Compliance with the Consent Decrees and the Agreed Order. Substantial Compliance means:

- 1) The Assessor has implemented the New Employment Plan, including procedures to ensure compliance with the Employment Plan and identify instances of non-compliance;
- 2) The Assessor has acted in good faith to remedy instances of non-compliance that have been identified, and prevent a recurrence;
- 3) The Assessor does not have a policy, custom, or practice of making employment decisions based on political reasons or factors except for Exempt Positions;
- 4) The absence of material noncompliance which frustrates the Assessor's Consent Decrees and the Agreed Order's essential purpose. However, technical violations or isolated incidents of noncompliance shall not be a basis for a finding that the Assessor is not in substantial compliance; and



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- 5) The Assessor has implemented procedures that will affect long-term prevention of the use of impermissible political considerations in connection with employment with the Assessor.

Since I started as the DOC, I have seen evidence of the presence of all five of these factors. As I continue in my role as the DOC, I see it incumbent upon myself to identify those areas where the Assessor's Office is failing to exhibit one or more of these factors and offer my guidance on how to best attain compliance. With the DOC, the Assessor's Office, and the Assessor Compliance Administrator working collaboratively towards a shared goal, I am confident that Substantial Compliance is on the horizon, not beyond it.