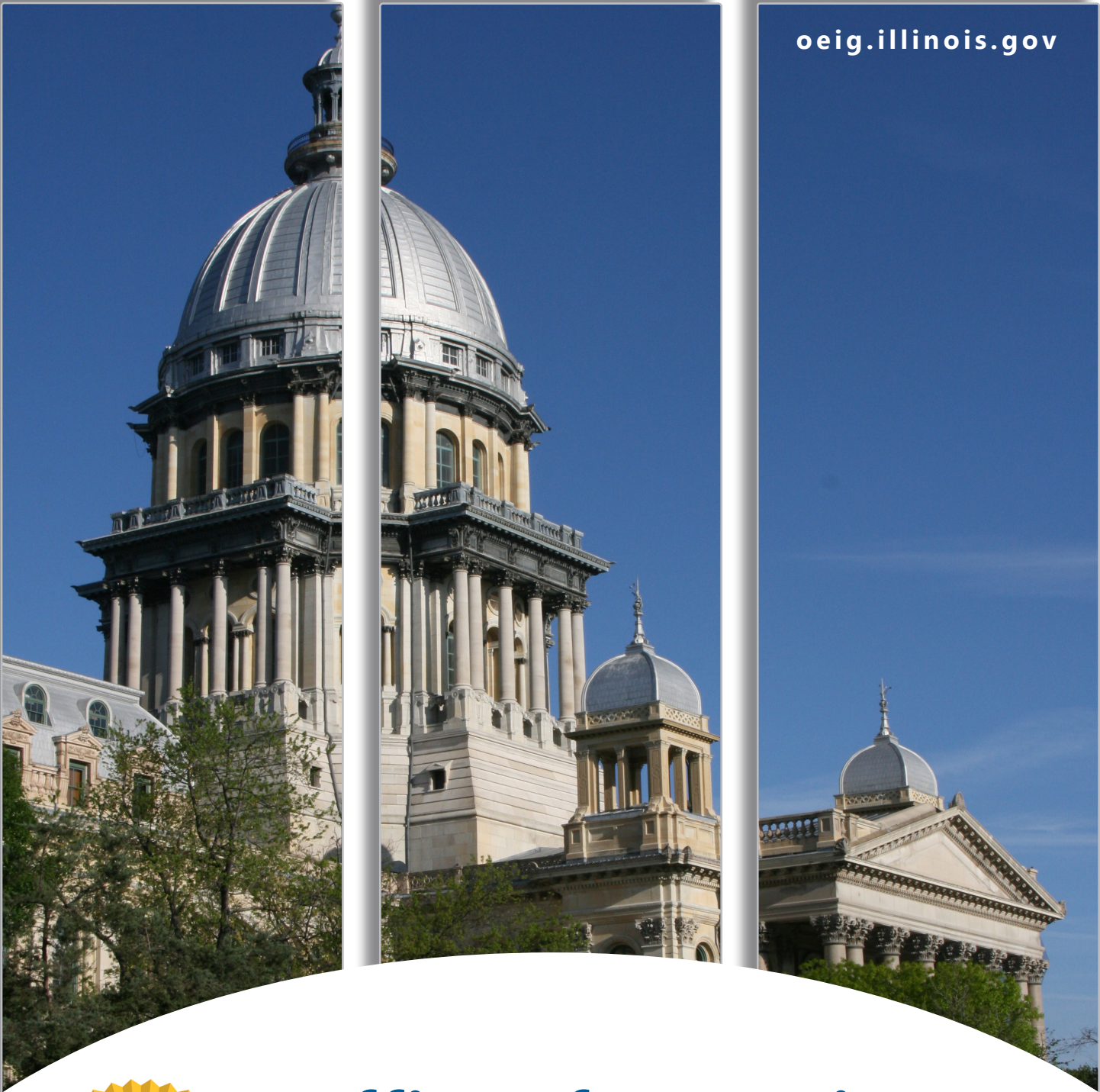


[oeig.illinois.gov](http://oeig.illinois.gov)



**Office of Executive  
Inspector General**  
for the Agencies of the Illinois Governor

**2024 Annual Report**



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# Message from Executive Inspector General Susan Haling

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It is with great pleasure that I present the FY2024 Annual Report for the Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG). In FY2024, we have continued to produce significant work based on our efforts to combat fraud, waste, and abuse in State government. As detailed below in our output section, for FY2024 the OEIG received a high total of 3,035 complaints, and self-initiated 96 investigations. In total, the OEIG opened 214 investigations, and completed 288 investigations, including 186 that resulted in findings of wrongdoing. In addition to these investigations, the OEIG also issued 81 hiring advisories; conducted 273 revolving door determinations; and oversaw ethics and harassment and discrimination training for over 172,000 individuals under our jurisdiction.

This volume of quality work is a result of our skilled and dedicated OEIG employees. Our staff's work ethic, objectivity, and professionalism are key to achieving our mission of improving integrity, efficacy, and accountability in State government. It is imperative to support and cultivate such a workforce. In past years, I have sought budget increases to meet the growing statutory demands of our Office, hired an appropriate number of staff, and worked to promote market-rate salaries and parity of pay for our employees. Moreover, our office has thoughtfully elevated diversity, equity, inclusion, and accessibility goals to ensure all staff have an opportunity to thrive. This intentional internal work has resulted in increased retention and high productivity among staff. Indeed, in FY2024, attrition was at a low 7%, down from 25% in FY2021. This low attrition rate continues despite the sizable increase in complaints, investigations, and reports issued.

Additionally, our office continues to work proactively in building an ethical culture at the entities we oversee. Our work to oversee hiring processes, ethics training, and harassment and discrimination prevention training, as well as recommending process changes and assisting in the instituting of such changes based on our investigative findings, has resulted in positive adjustments in State agencies. We have observed a willingness among State agencies to not only address bad actors, but also work toward improved systems, practices, and processes in the workplace.

In this report, we share many notable accomplishments and output of our efforts. While the OEIG is proud of its accomplishments, we recognize there is more to do. It is my steadfast commitment that the OEIG will continue to promote ethical conduct and integrity, and root out waste, fraud, and abuse.

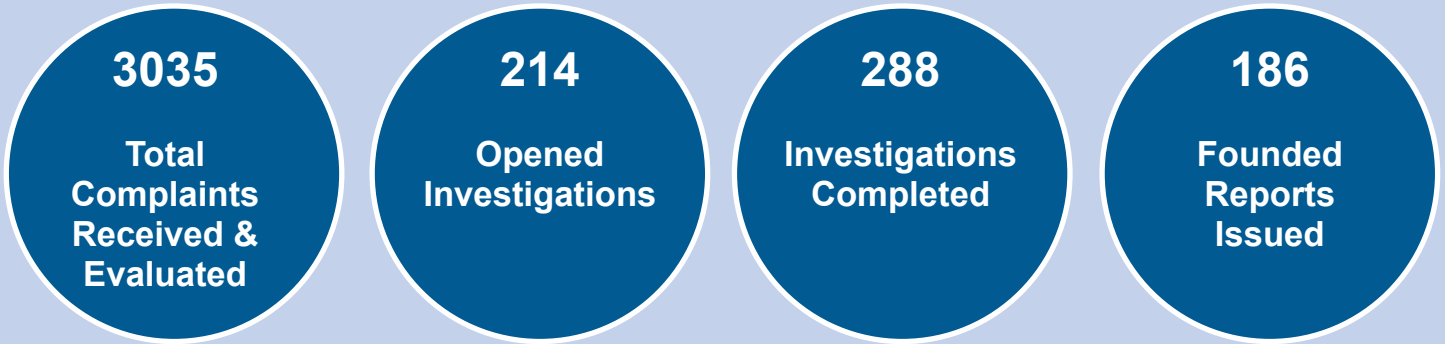
Sincerely,

A handwritten signature in blue ink that reads "Susan M. Haling". The signature is fluid and cursive, written in a professional style.

Susan M. Haling  
Executive Inspector General

# FY2024 OEIG Highlights

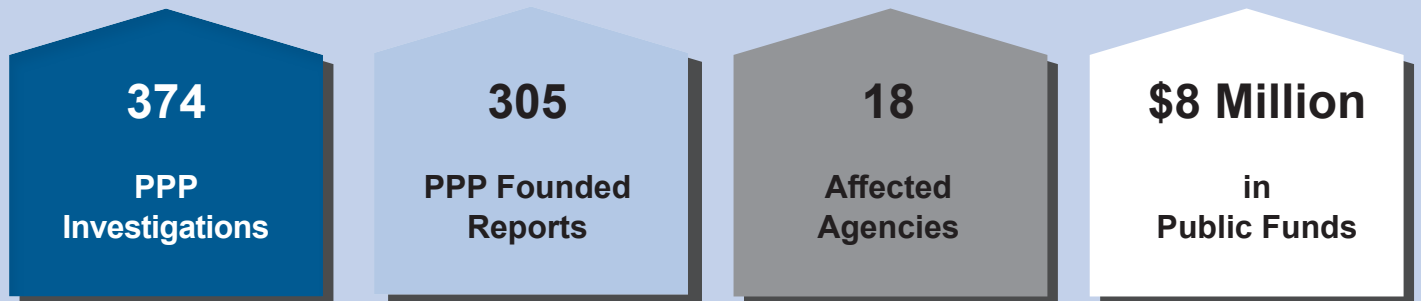
## INVESTIGATIONS



### Paycheck Protection Program (PPP)

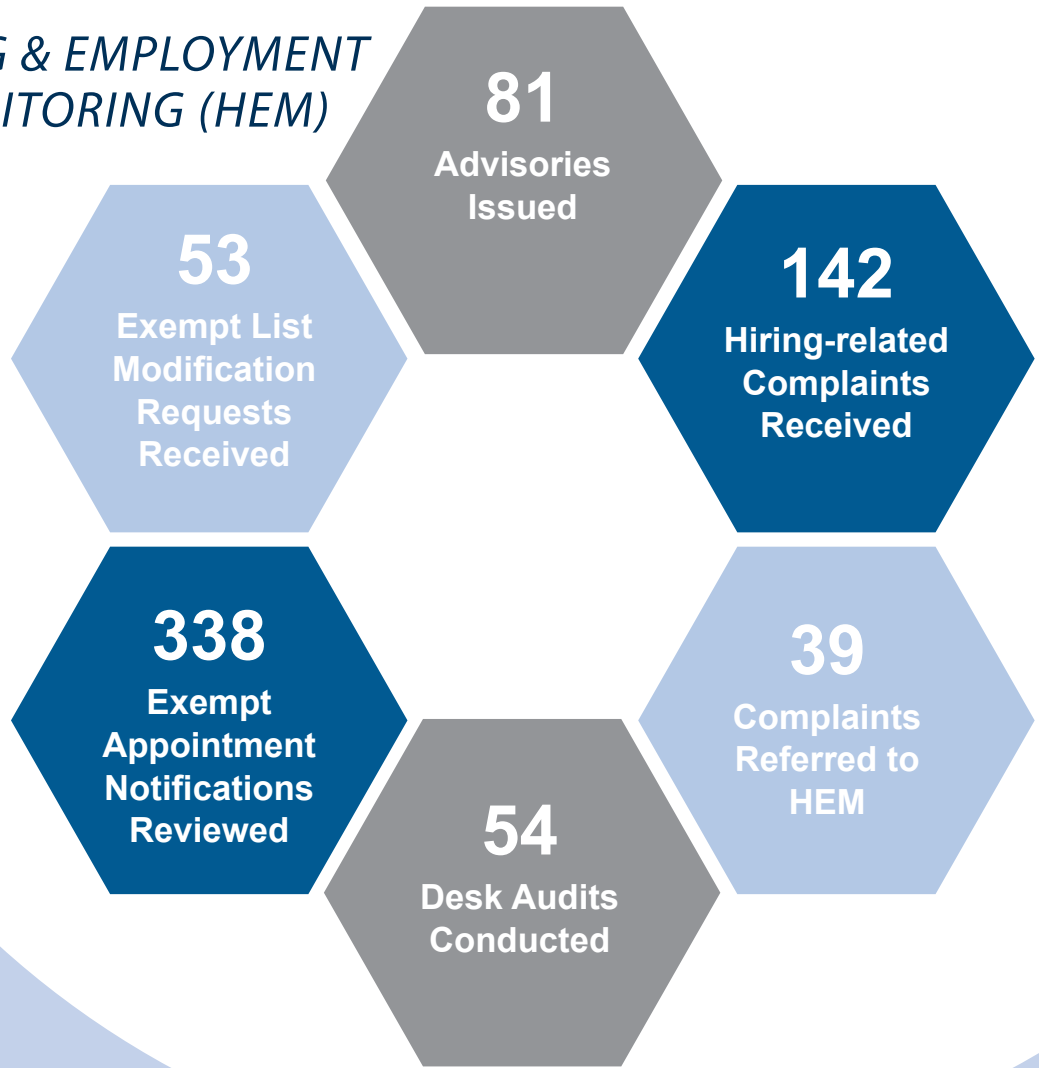
Beginning in 2022, the OEIG self-initiated a large-scale fraud investigation project to examine public employees under its jurisdiction who improperly obtained Paycheck Protection Program (PPP) loans. The Program was created by the Coronavirus Aid, Relief, and Economic Security Act and administered by the Small Business Administration (SBA) to provide relief to small businesses affected by the COVID-19 pandemic. PPP loans were made to eligible businesses, which included sole proprietorships and self-employed individuals, for qualifying payroll costs and business operating expenses such as insurance, rent, and utilities.

Using publicly available information, the OEIG identified PPP loans obtained by individuals with personal identifiers matching those of employees under the OEIG's jurisdiction. Through the end of FY2024, the OEIG conducted 374 investigations of potential PPP fraud. The OEIG issued reports making findings that employees obtained federal PPP loans based on falsified information in 305 cases totaling approximately \$8 million in public funds.



(2022 - FY2024)

*HIRING & EMPLOYMENT  
MONITORING (HEM)*



*REVOLVING DOOR  
AND TRAINING*





The State Officials and Employees Ethics Act (Ethics Act), 5 ILCS 430/1, et seq., established the Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG) in 2003. The OEIG is an independent executive branch State agency. The Ethics Act authorizes the OEIG to investigate allegations of fraud, waste, abuse, mismanagement, misconduct, nonfeasance, misfeasance, malfeasance, and violations of the Ethics Act (such as prohibited political activity, sexual harassment, the gift ban, and retaliation) and other related laws and rules. The OEIG also investigates allegations of hiring improprieties and conducts compliance-based reviews of employment procedures and decisions. In addition, the OEIG plays a vital role in reviewing Ethics Act-mandated trainings and conducting “revolving door” determinations.

The OEIG has jurisdiction over:

- » more than **170,000** State employees, appointees, and officials, including: including the Governor and the Lieutenant Governor;
- » more than **300** executive branch State agencies, departments, boards, and commissions;
- » the **nine** State public universities across a dozen campuses;
- » the **four** Chicago area Regional Transit Boards (the Regional Transportation Authority, the Chicago Transit Authority, Metra, and Pace); and
- » vendors and contractors of any of those entities.



# Investigations

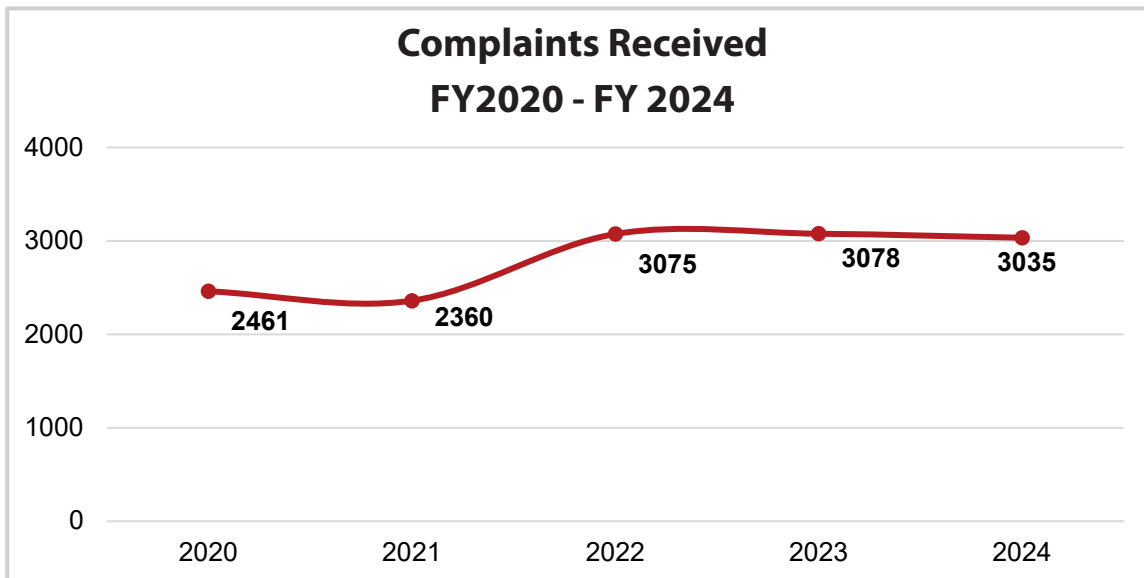
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The OEIG receives complaints from many different sources, including members of the public, State employees, law enforcement officials, contractors, and individuals requesting to remain anonymous. In the absence of consent from a complainant, the OEIG is required to ensure that the identities of complainants are and will remain confidential unless otherwise required by law.

The OEIG evaluates all new complaints to determine the appropriate action. To conduct investigations, OEIG investigators interview witnesses, collect documents, analyze records, conduct surveillance, perform computer forensics, and use a variety of other investigatory tools and techniques. The OEIG also has subpoena power to obtain information relevant to an investigation. Investigations are governed by the OEIG's Investigation Policy and Procedures Manual, the Illinois Administrative Code, and other applicable laws, rules, policies, and regulations, which can be viewed on the [OEIG's website](#).

## Complaints Received by the OEIG

During FY2024, the OEIG processed 3,035 complaints.



# Complaint Origins

The OEIG received these complaints through many different methods, including, among others:

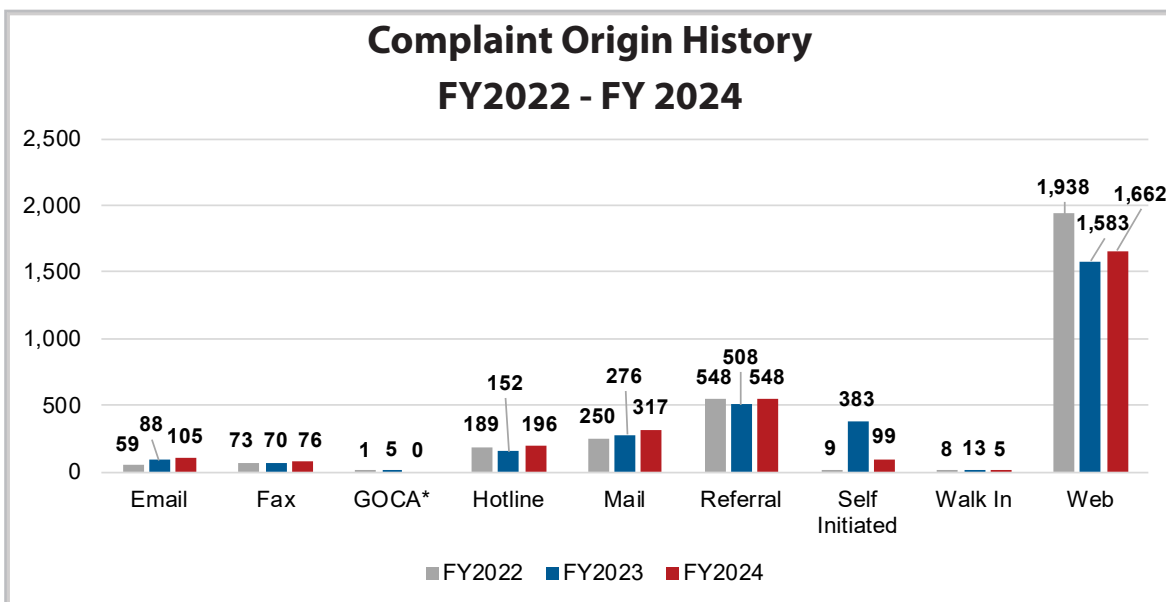
- » online complaint forms filed through its website: [oeig.illinois.gov](https://oeig.illinois.gov);
- » its toll-free hotline at 866-814-1113;
- » U.S. mail; and
- » via a telecommunications device for the deaf (TDD) at 888-261-2734.

Complaints about entities or persons under the jurisdiction of the OEIG may be submitted by anyone and may be submitted anonymously. However, a complaint must relate to the official conduct of:

- » an employee of, or appointee to, an executive branch State agency, board, or commission under the jurisdiction of the OEIG;
- » an employee of, or appointee to, a State public university;
- » an employee of, or appointee to, one of the Regional Transit Boards (the Regional Transportation Authority, Chicago Transit Authority, Metra, or Pace);
- » an employee of, or appointee to, one of the Regional Development Authorities; or
- » a person or entity (such as a vendor) doing business with an entity under the jurisdiction of the OEIG.

Anyone who files a complaint should have a reasonable belief that the allegations being reported are true. In addition, anyone filing a complaint must provide sufficient detail about the allegations in order for an investigation to be initiated.

In FY2024, the OEIG received complaints from many different sources, including, for example, other State employees, private citizens, vendors, and law enforcement authorities. Some complaints were filed anonymously. The OEIG also self-initiated investigations based on public information or information learned in other investigations.



\* Governor's Office of Constituent Affairs

# Complaint Evaluation Process

The OEIG has 30 days after receiving a complaint to process it and decide how to proceed. Initially, the OEIG assigns each complaint a file identification number and inputs the information into the OEIG database. The OEIG determines whether any immediate action needs to be taken and then proceeds to evaluate the complaint for an appropriate disposition, which generally includes:

- » opening an investigation;
- » referring the complaint to an appropriate authority; or
- » administratively closing the file.

The OEIG opened 214 investigations in FY2024.

This year, the OEIG self-initiated numerous investigations based on information learned from public materials or in other investigations. The OEIG also opened many investigations based on the complaints it received. At times, the OEIG received multiple complaints related to one another and consolidated those complaints into one investigation.

In FY2024, the OEIG referred 2,727 complaints and/or investigations to other agencies or appropriate entities, including law enforcement authorities. In some instances, when the OEIG refers the matter to another agency, the OEIG requests that the agency investigates the allegations and respond summarizing the results of its investigation. The OEIG then reviews these agency responses to determine whether the agency adequately addressed the allegations or whether the OEIG should subsequently open an investigation. In the absence of consent from a complainant, when referring complaints to others, the OEIG does not disclose the identities of complainants unless otherwise required by law.

In FY2024, the OEIG also administratively closed 186 complaints and investigations. The OEIG administratively closed these complaints when, for example, the complaint was not within its jurisdiction; the complaint did not allege a violation of State law, rule, or policy; the alleged wrongdoing occurred a long time ago; or there were duplicate complaints about a matter.

## Overview of Investigations Concluded

Once an investigation is opened, the OEIG determines the appropriate means of investigation, which generally includes, for example, interviewing witnesses, obtaining and analyzing relevant documents, performing electronic forensic analysis, and/or conducting surveillance. Of note, the OEIG has subpoena power to obtain relevant information for its investigations. This year, the OEIG issued approximately 350 subpoenas to various entities in its pursuit of extensive documents.

The length of time required for an investigation depends on factors such as the nature of the allegations, the number of interviews to be conducted, the volume and complexity of records that must be obtained and analyzed, and the OEIG's staffing levels.

The OEIG completed 288 investigations in FY2024.

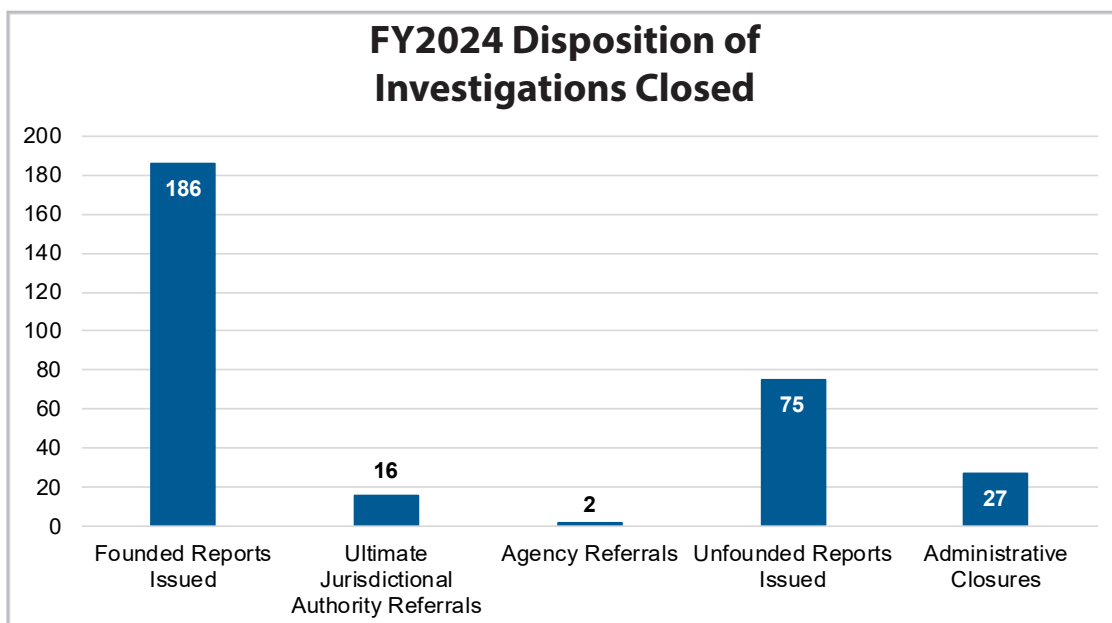
At the conclusion of an investigation, if the OEIG determines there is reasonable cause to believe that a violation of law or policy has occurred, it writes a founded summary report. In FY2024, the OEIG issued 186 founded summary reports documenting the following:

- » the allegations of wrongdoing;
- » facts confirmed by the investigation;
- » an analysis of the facts in comparison to the applicable law, rule, or policy;
- » findings and recommendations; and
- » any other information the OEIG deems relevant to the investigation or resulting recommendations.

In accordance with State law, the OEIG provides founded reports to the head of each agency affected by or involved with the investigation and the appropriate ultimate jurisdictional authority.

If the OEIG determines that there is insufficient evidence to reasonably believe that a violation of law or policy has occurred, it issues an unfounded report that consists of a written statement to the EEC summarizing its decision to close the matter. Alternatively, the OEIG may “administratively close” an investigation for various reasons, including, for example, when the agency has already adequately investigated and/or addressed all of the allegations, or the OEIG discovers a pending lawsuit or criminal investigation that involves the same allegations.

If after completing an investigation, the OEIG does not make any findings of wrongdoing regarding an allegation, but the investigation has revealed procedural or systemic flaws that need to be addressed, the OEIG may close the investigation and refer these issues to the ultimate jurisdictional authority (UJA) or relevant agency with recommendations to take administrative action. For example, in FY2024, there were 16 instances in which the OEIG unfounded or administratively closed an allegation but made a referral to the UJA; there were an additional two instances in which the OEIG unfounded an investigation but made a referral to a relevant agency, with recommendations. In several of these instances, the OEIG requested a response summarizing any actions the UJA took in response to the referral.



# Referrals to the Ultimate Jurisdictional Authority

As noted above, in some circumstances, the OEIG refers matters to the UJA to take administrative action. The UJAs include the Governor's Office; the boards of trustees for public universities; the boards of the Regional Transit Boards for their respective employees; and the appropriate Regional Development Authority for their respective authorities. A UJA referral generally provides the UJA with information obtained in the investigation and recommendations for corrective action regarding the agency's processes. These administrative referrals generally occur when the OEIG has not found sufficient evidence of wrongdoing but has identified a systematic issue, or believes a policy or practice needs to be adjusted or implemented, additional training is needed for an agency's staff, or other systemic changes would be helpful.

In FY2024, the OEIG referred matters to the Governor's Office in 11 instances, and often recommended that it work with relevant agencies to update existing processes, policies, or tracking mechanisms, or create new ones, in order to improve or address various matters. For example, in FY2024, the OEIG recommended that the Governor's Office work with several agencies to update their conflict of interest policies and train staff on such policies. The OEIG also referred matters to a UJA for a university or Regional Transit Board on five occasions. In some instances, the OEIG requested a response to the referral and reviewed those responses to ensure the UJA and relevant agency were appropriately implementing and/or otherwise addressing recommendations.

The following are summary examples of those referrals and the responses provided by the Governor's Office:

- » **OEIG Case #21-02527:** In this investigation, the OEIG examined an agency's employees' overtime worked after hours and on weekends, supervising children who are temporarily without placements. The OEIG's investigation revealed that multiple employees consistently worked excessive amounts of such overtime, in addition to their regular full-time shifts. In some cases, the employees regularly worked multiple consecutive shifts over extended periods of time, which left them little to no time outside their work hours to sleep, raising serious safety concerns. In addition, the OEIG discovered that the agency had not issued guidance on how to assign this overtime, and did not have an action plan specifically to address staff working large amounts of overtime. The OEIG recommended that the Governor's Office work with the agency to issue clear written policies and procedures for how this type of overtime should be assigned and overseen.

In response, the Governor's Office reported that since the referral, the agency has established a policy for assigning overtime shifts that imposes limits on the number of consecutive hours and number of overtime shifts employees may work, and requires input from the supervisor of an employee seeking to work overtime; the agency also established a process for tracking and reviewing overtime assignments. In addition, the agency updated its guidelines for doing this type of overtime, and explicitly clarified that sleeping during overtime is prohibited.

- » **OEIG Case #22-02244:** In this investigation, the OEIG examined allegations of misappropriation of funds at an agency. As part of the investigation, the OEIG reviewed a

sample of inventory records and compared them to receipts for items purchased during the same period as part of an agency program meant to benefit individuals with disabilities. This review revealed a number of concerns regarding the purchasing and inventory procedures used as part of this program. Specifically, there were instances where the items on the receipts did not match the items listed on the inventory forms; the items reflected on the receipts did not consistently match the added product counts or were not reflected in the inventory at all; the end weekly inventory counts for one week did not match the beginning weekly counts for the following week; and there appeared to be significant gaps in the inventory records. The investigation also revealed that supervisory staff in charge of the program did not sign off on receipts to ensure that purchased items were physically brought into the facility. The OEIG recommended that the Governor's Office work with the agency to address these issues and to determine whether any updates to the agency's procedures were necessary.

The Governor's Office reported that as a result of the OEIG's referral, the agency updated its program inventory process to ensure proper accounting for all purchases and inventory. These changes included an improved inventory system that required control and subcontrol numbers to be assigned to each purchasing transaction for the program; subcontrol numbers to be written on receipts to ensure purchases are tracked; documentation of supervisor approval for program fund transactions; enhanced documentation of supervisor approval for program fund transactions; and enhanced documentation of expenditures and inventory related to the program. The Governor's Office also noted that to ensure compliance with the updated procedures, the agency has implemented quarterly audits of program purchases and inventory and has provided training to program and accounting staff on the updated processes.

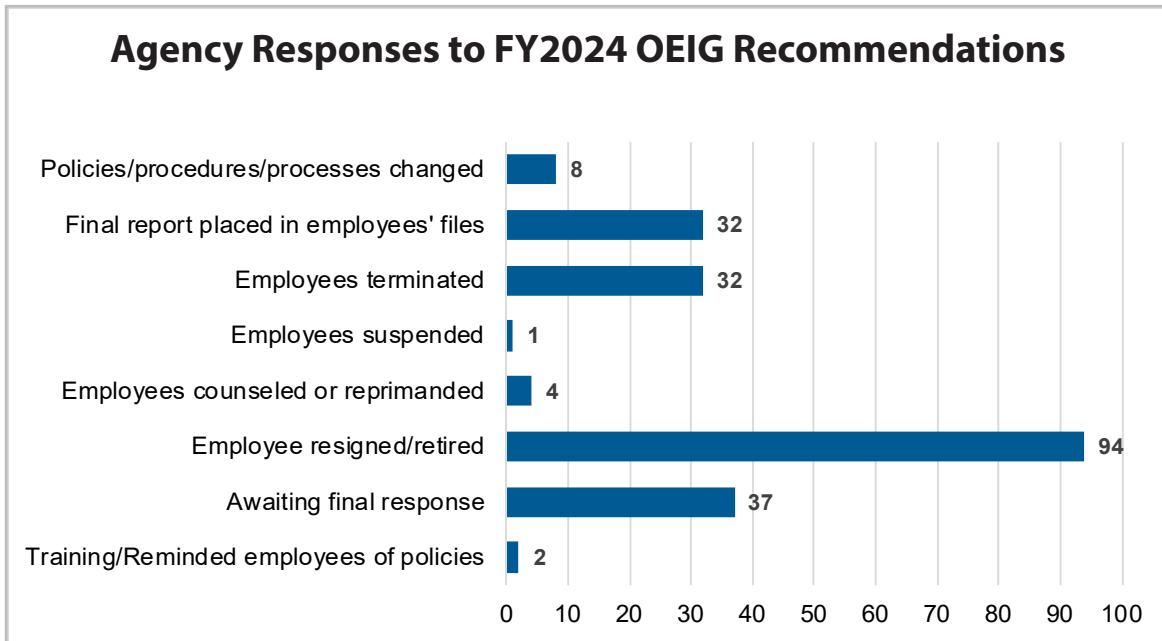
## Founded Summary Report Recommendations and Agency Responses

As described above, upon completion of an investigation, if the OEIG finds reasonable cause to believe violations occurred, the OEIG will issue a founded report with recommendations to the affected agency. In FY2024, the OEIG's recommendations included, for example:

- » terminating an employee;
- » imposing other disciplinary action against an employee;
- » placing a copy of the founded report in a former employee's personnel file;
- » adjusting agency policies or procedures; and
- » conducting appropriate training of employees.

It is the responsibility of affected agency to take appropriate action after receiving an OEIG report and recommendations. Specifically, per the Ethics Act, within 20 days after receiving a founded report from the OEIG, the appropriate agency head and/or the ultimate jurisdictional authority must respond to the OEIG about the report and describe any corrective or disciplinary actions being taken. Occasionally, the agency's final response may be delayed due to a protracted grievance or administrative review process.

As shown in the following chart, agencies often adopt the OEIG’s recommendations and take disciplinary action against employees or seek to change policies that may have contributed to misconduct or could help to prevent future misconduct. In FY2024, OEIG investigations resulted in many employees resigning and multiple employees being counseled, disciplined, or terminated; the OEIG is still awaiting final responses from agencies regarding numerous investigations, as disciplinary action is still being pursued or grieved. In addition, agencies have provided employee and/or management training, and updated policies and processes. The following chart displays agency actions taken in response to OEIG founded reports issued in FY2024.



## OEIG Founded Investigations Based on Violations of the Ethics Act

If the OEIG conducts an investigation and determines that there is reasonable cause to believe that a violation of the Ethics Act has occurred—such as a revolving door or gift ban violation, prohibited political activity, sexual harassment, retaliation, or failure to cooperate with an OEIG investigation—the OEIG issues a founded report to the affected agency to pursue disciplinary or other appropriate action (in accordance with the process described above). Additionally, the OEIG may also ask the Illinois Attorney General’s Office (Attorney General) to file a complaint regarding this misconduct. After reviewing the OEIG’s investigative materials, the Attorney General may file a complaint, on the OEIG’s behalf, with the EEC.

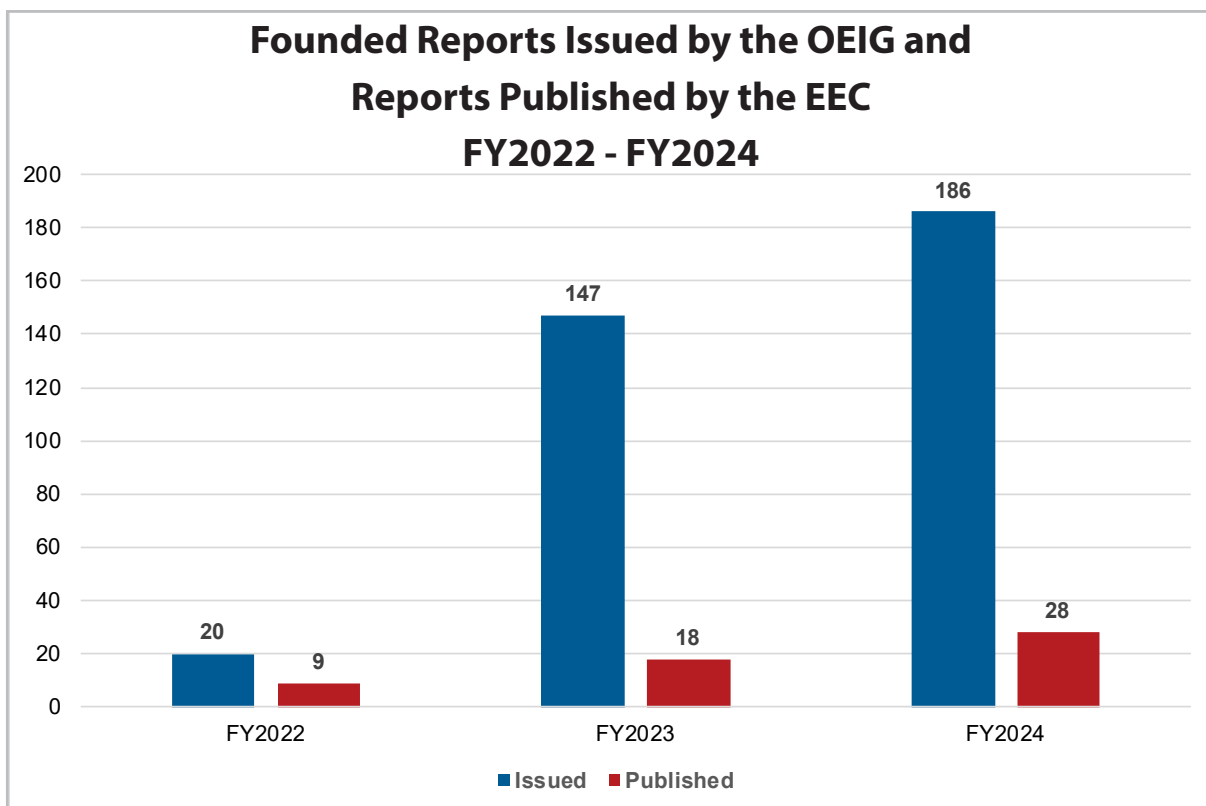
If the EEC ultimately determines that a violation of the Ethics Act occurred, the EEC may impose an administrative fine or take other appropriate injunctive relief. The EEC’s decision to impose a fine or injunctive relief is subject to judicial review.

As of the close of FY2024, there were two Ethics Act cases that remained pending with the EEC based on investigations conducted by the OEIG.

# Publicly Disclosed Founded Reports

Under the Ethics Act, within 30 days after receiving the initial agency response to a founded report, the OEIG must forward a copy of the report and agency response to the EEC unless the OEIG believes a complaint should be filed alleging a violation of the Ethics Act, as discussed above. The EEC reviews OEIG founded reports and determines whether each report will be published. The Ethics Act requires the publication of founded reports if a report resulted in a suspension of three or more days, or termination of employment. The EEC can exercise its discretion to decide whether additional founded reports will be made public.

During FY2024, the EEC made 28 founded reports of OEIG investigations available to the public, along with the relevant agency responses and responses that the subjects of the investigations may have submitted. The EEC redacted these reports and responses. Since the EEC does not typically publish reports until the entire disciplinary process is complete, reports are not always made public in the same year the OEIG issued the reports. Delay in publication may also occur if public release of a report could interfere with other ongoing investigations.





## FY2024 Founded Report Summaries

OEIG Case No.	Agency	Misconduct
22-02192	Department of Human Services	Misconduct involving Secondary Employment
21-02272	Department of Transportation	Misconduct involving Secondary Employment
21-01474	Department of Central Management Services	Misconduct involving Secondary Employment
22-01632	Department of Human Services	Misconduct involving Secondary Employment
22-00458	Illinois Commerce Commission	Misconduct involving Secondary Employment
21-02372	Illinois Mathematics and Science Academy	Misconduct involving Secondary Employment
22-00503	Illinois Department on Aging	Mismanagement
20-01251	Department of Agriculture	Hiring Improprieties
20-01338	Illinois State Toll Highway Authority	Failure to Report Procurement Communications
19-00547	Department of Human Services	Document Falsification
22-02597	Department of Healthcare and Family Services	PPP Founded Report
23-00048	Department of Human Services	PPP Founded Report
23-00059	Department of Human Services	PPP Founded Report
23-00061	Department of Human Services	PPP Founded Report
23-00063	Department of Human Services	PPP Founded Report
23-00064	Department of Human Services	PPP Founded Report
23-00089	Department of Human Services	PPP Founded Report
23-00099	Department of Human Services	PPP Founded Report
23-00109	Department of Human Services	PPP Founded Report
23-00112	Department of Human Services	PPP Founded Report
23-00119	Department of Human Services	PPP Founded Report
23-00134	Department of Human Services	PPP Founded Report
23-00135	Department of Human Services	PPP Founded Report
23-00152	Department of Human Services	PPP Founded Report
23-00165	Department of Human Services	PPP Founded Report
23-00166	Department of Human Services	PPP Founded Report
23-00862	Department of Human Services	PPP Founded Report
23-00127	Department of Human Services	Failure to Cooperate & PPP Founded Report

Below are summaries of the founded reports published in FY2024. The summaries are organized by category based on the primary type of misconduct. These redacted reports, as well as reports from past fiscal years, can be found on the OEIG website: [oeig.illinois.gov](https://oeig.illinois.gov).

### *Misconduct involving Secondary Employment*

#### OEIG Case No. 22-02192

The OEIG opened an investigation into allegations that a former Illinois Department of Human Services (DHS) Division of Substance Use Prevention and Recovery (SUPR) employee was also employed by DHS SUPR grantees, potentially in violation of DHS policies.

***“The simple fact that [the DHS employee] was employed by DHS and its grantees simultaneously created a conflict of interest because the arrangement called into question whether his actions, judgments, and decision-making on behalf of DHS were unbiased.”***

Based on its investigation, the OEIG learned that the employee was simultaneously employed by DHS on a temporary contract and for two grantees, and worked on issues for the grantees that were directly related to the type of work he at least used to perform for DHS during his full-time employment, and was in fact being paid by the grantees from grant funds that came from the SUPR Division. Importantly, the OEIG also found that the employee failed to disclose his working relationships to his DHS supervisor or anyone else at DHS.

Ultimately, the OEIG concluded that the employee violated DHS and State of Illinois policies on secondary employment and employee conduct by having either an appearance of, or an actual, conflict of interest based on his working relationships with SUPR grantees; failing to appropriately disclose those working relationships; and using State time to conduct his secondary employment.

The OEIG recommended that the employee not be rehired by DHS and that DHS consider revising its secondary employment form. DHS reported that it followed the recommendations by placing a copy of the report in the employee’s personnel file, updating its secondary employment disclosure form to request more details about proposed secondary employment, and improving the process for secondary employment form completion, review, and maintenance.

## OEIG Case No. 21-02272

***“The total hours of time during the workday [the Support Services Specialist] spent on her personal cell phones was over 1,015 hours which is the equivalent to 135 seven and a half-hour workdays. Based on the evidence, there is reasonable cause to believe that [the Support Services Specialist] violated IDOT policy by abusing State time.”***

The OEIG received complaints alleging that an Illinois Department of Transportation (IDOT) Supportive Services Specialist also worked as an Alderperson and was conducting her Alderperson duties on State time.

The OEIG investigation revealed that just prior to being appointed as an Alderperson, the Support Services Specialist served as Trustee of a township, both of which are elected, compensated positions. The OEIG obtained the Support Services Specialist’s personal cell phone records and located, at minimum, 163 phone calls, totaling over 39 hours, during an 18-month period with city and township officials during her reported State work hours. In an interview, the Support Services Specialist told the OEIG that she did not use her personal cell phones to conduct IDOT business and admitted that 54 of a sample of 66 calls shown to her were unrelated to her IDOT duties and that at least some related to her Alderperson and/or Trustee positions. Additionally, the Support Services Specialist was observed having lunch with the city Mayor for at least 75 minutes during her reported State work hours despite only being allotted 30 minutes for a lunch break and spent approximately two hours and 14 minutes of State time attending four township meetings when she served as a Trustee.

In her interview, the Support Services Specialist further admitted that 14 of a sample of 15 calls in her personal cell phone records, ranging from 81 to 93 minutes each and totaling over 20 hours, were personal calls that occurred during her reported State work hours.

In addition, during a time that the Support Services Specialist served as a coordinator for a political campaign of a candidate for State office, her personal cell phone records included 13 calls and three text messages during her reported State work hours between her and the candidate and/or the candidate's staff member. Six of these calls and one of the text messages occurred outside of the lunch timeframe of 11:00 a.m. to 2:00 p.m.

The OEIG investigation revealed that the Support Services Specialist failed to report to IDOT her outside employment as a Trustee and for three businesses from which she received income, two of which she had an ownership interest in.

The OEIG concluded that there was reasonable cause to believe that the Support Services Specialist violated IDOT policy and/or the Ethics Act by performing outside employment during State time; abusing State time; engaging in prohibited political activity during compensated State time; and failing to report all of her outside employment to IDOT. The Support Services Specialist separated from IDOT prior to the OEIG's issuance of this report, so the report was placed in her personnel file.

#### OEIG Case No. 21-01474

The OEIG investigated whether a married couple, both State employees, were conducting outside employment on State time. The investigation revealed that the husband, a carpenter with the Illinois Department of Central Management Services (CMS), co-owned two businesses. A review of the carpenter's personal telephone records revealed multiple telephone calls and text messages between him and individuals associated with his businesses. In an interview, the CMS employee admitted that at least some of these communications were related to his outside employment. Additionally, after a review of publicly available information online, it appeared that the CMS employee improperly used sick time to conduct work for his outside employment. The CMS employee also did not disclose his outside employment at the time he began the outside employment.

The investigation also revealed that the wife, a State Board of Elections (SBE) Administrative Specialist, who was working remotely part of the time, had not disclosed her outside employment to SBE. In her interview, she explained that she did not consider the sales from a "craft hobby business," which she operated from home, as outside employment even though the income from that business far exceeded her State income, the business had a paid employee, and she sold her items via a website, at craft shows, and at auctions, among other places.

***“Given that [State employee] works from home for her SBE job two days a week, it was especially important for SBE to be aware that she also conducts significant business through [outside business] from her home, to ensure outside employment policies are being properly followed.”***

The OEIG concluded that both employees failed to report their secondary employment to their State agencies and that the husband also misused State time to engage in work for his outside employment. The OEIG recommended that they both be disciplined. As a result of the investigation, the husband received a 25-day suspension and the wife received a written reprimand.

The OEIG further recommended that both State agencies ensure their respective outside employment forms are thoroughly vetted for potential conflicts of interest as well as for potential improper use of State time and/or resources. In addition, the OEIG also recommended that the SBE update its timekeeping system to require staff to document work start and end times, as well as designated lunch breaks. In response to the report, the SBE said it would do so.

## OEIG Case No. 22-01632

The OEIG received an anonymous complaint alleging that a DHS Health Information Associate used sick leave benefit time to work a second job as a nurse at a local hospital. DHS policy permits sick leave to be used for employee or immediate family member illness or medical appointments, and authorizes DHS employees to undertake secondary employment only so long as it is outside scheduled DHS work hours, and does not present an actual or potential conflict of interest with an employee's regular DHS duties. All DHS employees are required to submit forms accurately reporting any secondary employment annually.

***“ The [Health Information Associate] confirmed that [Hospital 1]’s records accurately reflected her hours worked there, and confirmed that the records showed overlap with DHS sick time, and therefore her denial that she used sick time to work at [Hospital 1] is not believable.”***

Through a comparison of her DHS timesheets, benefit time records, and timesheets obtained from the hospital she worked at, the OEIG determined that, over five dates between January and August 2022, the Health Information Associate worked at her secondary job at the hospital for almost 8.5 hours while using DHS sick leave. In an interview, although she denied using DHS sick leave to work her hospital job, she confirmed the accuracy of the timekeeping records from both DHS and the hospital, and admitted that she would not have gone back to work at DHS once she completed whatever purportedly legitimate purpose the sick leave may have been scheduled for.

In addition, the Health Information Associate's DHS secondary employment form for 2022 also inaccurately reflected that she would only be working her secondary job on Mondays from 3 p.m. to 11 p.m., and every other weekend. Records from the hospital showed that she had worked there for almost 20 hours on weekdays other than Mondays prior to even submitting the secondary employment form in 2022, and continued to do so, working more than 100 additional hours at the hospital on weekdays other than Mondays in the first nine months of 2022. In her OEIG interview, she confirmed that she did not receive approval to work weekdays other than Mondays at her secondary job.

Ultimately, the OEIG concluded that the Health Information Associate violated DHS policies on use of sick leave and secondary employment by working her hospital job while on DHS sick leave and by failing to accurately report when she would be working at the hospital. In response to this report, DHS issued the employee a three-day suspension, and confirmed that she updated her secondary employment form to include the days and hours of her secondary job, and verified these times do not conflict with her DHS work hours.

### OEIG Case No. 22-00458

The OEIG investigated allegations that an employee of the Illinois Commerce Commission (ICC) was also providing legal services for a company that was regulated by the ICC.

The investigation revealed that the ICC employee had been a registered attorney since 1996, had a law firm, and had worked at ICC since 1999 as an Analyst. Documents reflected, and interviewees confirmed, that the Analyst signed an agreement with the company, dated June 3, 2021, for one year with an annual renewal option; both he and his law firm received payments from the company; he had a Power of Attorney granting him the authority to take actions on behalf of the company's CEO; and that from October 2021 to February 2022, the Analyst was named as the Registered Agent of the company.

The Analyst confirmed that, in his role at the ICC, he was assigned to review two applications submitted by the company he worked for, he did not ask to be disqualified from the company's application approval process, and when he was initially assigned the applications, he did not inform anyone at ICC about his relationship with the company. Rather, the Analyst admitted that he only informed his supervisor of the relationship with the company after another ICC employee asked about his name appearing as the Registered Agent.

The OEIG concluded, among other things, that the Analyst failed to disclose a private interest that conflicted or appeared to conflict with his ICC duties and responsibilities, and failed to immediately notify his supervisor and disqualify himself from official ICC action related to the company he worked for. The Analyst retired from State employment soon after his OEIG interview, so the OEIG recommended that the ICC place a copy of the report in his personnel file; in its response, the ICC indicated that it took this action.

The OEIG also recommended that the ICC revise its outside employment policy, which at the time only required employees to obtain written approval if the employee believed there may be a conflict of interest, to more broadly require its employees to report all proposed outside employment to a supervisor or designee prior to accepting the outside employment. In its response, the ICC said that it was in the process of revising its outside employment policy to bring the ICC in line with best practices.

## OEIG Case No. 21-02372

The OEIG received a complaint alleging that an Illinois Mathematics and Science Academy (IMSA) Director was conducting secondary employment on State time when working on her solely-owned business. In addition to her obligation to comply with IMSA's secondary employment policy, the Director was required to complete annual Statements of Economic Interests that report on business assets over \$10,000 and non-State annual income over \$7,500.



The Statements of Economic Interests filed by the Director that covered years 2018-2021 did not list any information regarding her business or the income she derived from it. During her OEIG interview, the Director confirmed that in 2021 alone her business had revenue of \$47,000 and that she personally earned approximately \$20,000 in income from the business. Although the Director claimed she did not know she needed to disclose such information on the Statements of Economic Interests because the business was not in her name (and was instead in the business name), the OEIG ultimately concluded that she violated the Illinois Governmental Ethics Act and the requirements of Executive Order 15-09 when she failed to report her ownership interest in the business and the income she earned from it.

The OEIG recommended, in part, that IMSA revise its outside employment policy to require reporting of all proposed outside employment so it can be vetted objectively, rather than allowing the employees to decide themselves whether they have a conflict before obtaining approval for such employment, as the policy at the time allowed. In response to this report, IMSA revised its outside employment policy in line with the OEIG's recommendations.

## *Mismanagement*

### OEIG Case No. 22-00503

The OEIG received a complaint alleging that the Illinois Department on Aging (IDoA) mismanaged a grant when it failed to reimburse a grantee for services in federal fiscal year 2020 and that IDoA staff later created a fictitious grant agreement in order to improperly effectuate the late payment to the grantee.

Based on its investigation, the OEIG learned that in November 2020, the grantee in question submitted a cash request for over \$10,000, but that request went mistakenly unpaid by IDoA in fiscal year 2020. According to a high-ranking employee at the Illinois Office of Comptroller (Comptroller), if a State agency fails to pay a grantee for services provided during a fiscal year, the only valid option is for the agency to go back to the General Assembly and either (1) ask for an appropriation for the unpaid funds during the fiscal year they wish to make the payment, or (2) request authorization for prior year spending in a certain appropriation.

The OEIG discovered that instead of pursuing either of these options, in February 2022, IDoA executed a special grant agreement in the exact amount of the missing 2020 payment. However, that grant agreement contained false information, namely that the service and project dates fell within fiscal year 2022, when in fact the payment was intended for services previously provided in fiscal year 2020. If the grant agreement had contained the actual service dates, the Comptroller would not have processed the payment.

The OEIG observed that “[b]y including false dates of service on its voucher, IDoA circumvented the established rule framework in order to accomplish its own needs” and concluded that the IDoA Chief Fiscal Officer participated in dishonesty in the performance of her duties in violation of IDoA policy. The OEIG also determined that the then-IDoA Director engaged in mismanagement by signing off on the made-up grant agreement in circumvention of Comptroller requirements.

The OEIG recommended that the Governor’s Office work with IDoA to take whatever action it deemed appropriate regarding the Chief Fiscal Officer and Director, and to ensure that IDoA had appropriate processes in place to reduce the possibility of such missed payments reoccurring. In response, the Governor’s Office indicated it worked with IDoA to update their processes and create a policy for how to address payments for prior grant expenditures, and met with the Chief Fiscal Officer and Director about the issues raised in the report. In addition, the Governor’s Office indicated that the Chief Fiscal Officer received a two-day suspension and the IDoA Director had previously indicated she would be retiring.

***“Regardless of the pressure, described by [the CFO], to make sure that service providers are paid, choosing to make fictitious grant agreements and misrepresentations in voucher submissions to the Comptroller is not the answer and certainly is not in keeping with finance rules designed to ensure fiscal transparency.”***

## ***Hiring Improprieties***

### **OEIG Case No. 20-01251**

The OEIG received a complaint alleging that a Bureau Chief (who was an Assistant Bureau Chief at the time) of the Bureau of Meat and Poultry Inspection for the Illinois Department of Agriculture (AGR) had communicated a hiring preference to another interviewer for a Meat and Poultry Inspector Trainee position.

The State’s Comprehensive Employment Plan (CEP) sets forth principles that govern the State’s hiring policies and procedures, including that interviewers must independently evaluate each candidate following the interview, and then independently identify on an evaluation form whether a candidate shall be subject to further consideration. The CEP permits interviewers to discuss their initial scores with each other upon completion of the interviews, and amend these scores based on further consideration, but warns that interviewers should not seek a consensus in their scoring. The CEP also requires that any State employees involved in the various stages of the hiring process, including candidate interviews, complete a Conflict of Interest Certification and Disclosure form (Conflict Form).

During its investigation, the OEIG found that supervisors had been allowed to attend hiring interviews as observers and provide input. Conflict Forms for the assigned interviewers had not been timely submitted and vetted prior to the interviews being conducted for the Trainee position, nor had the supervisors/observers been required to submit Conflict Forms. Additionally, a review of the hiring files for the Trainee position revealed that, although required by the CEP, no preferred responses (a consistent set of standards for evaluating candidates' responses by identifying what an ideal candidate will address in a response) were included.



Based on the investigation, the OEIG concluded that the Bureau Chief violated the CEP when he sought the input of a supervisor, changed his scores based on supervisor input, failed to document why he changed his scores, and communicated a hiring preference to another interviewer in an attempt to seek a consensus and influence that interviewer's evaluation of the candidates.

The OEIG recommended that AGR: take appropriate disciplinary steps with respect to the Bureau Chief, work to ensure Human Resources staff and managers involved in hiring understand the CEP requirements associated with interviewing, ensure that Conflict Forms continue to be timely submitted and vetted, and that preferred responses be included in its hiring plans going forward. AGR responded to the report by issuing a written reprimand to the Bureau Chief and agreeing to implement or continue the other recommendations. In addition, AGR said it would no longer allow observers in interview sequences.

## *Failure to Report Procurement Communications*

### *OEIG Case No. 20-01338*

The OEIG received a complaint alleging that an Illinois State Toll Highway Authority (Tollway) employee violated requirements laid out in the Illinois Procurement Code by failing to report a communication she received from an attorney representing a bidder on an active procurement matter.

Tollway maintains Illinois' tollway system and has an 11-member Board. Tollway's Procurement & Compliance Department is responsible for procuring goods and services, plus ensuring contract compliance. The Illinois Procurement Code requires certain State employees, including the Tollway employees involved in this investigation, to report communications to the Procurement Policy Board if they receive a communication from an outside party regarding an active procurement matter that imparts or requests material information or makes a material argument regarding potential action.



During the investigation, the OEIG reviewed two procurement files and corresponding email records. The OEIG found several emails that were seemingly reportable under the Illinois Procurement Code. The OEIG also interviewed several individuals involved in Tollway's procurement process. Everyone interviewed during the investigation indicated that they were generally aware that the Illinois Procurement Code required them to report certain communications, but several individuals stated they did not recall any specific training on what they were obligated to do, and instead said they trained themselves by reading the Illinois Procurement Code and related materials.

Based on the investigation, the OEIG determined that the Chief of Contract Services and one Board member violated the Illinois Procurement Code by failing to adequately report external communications in active procurement matters. The OEIG recommended that Tollway and/or the Governor's Office (as the ultimate jurisdictional authority for the Board) take whatever action deemed necessary with respect to the Chief of Contract Services and Board member. The OEIG also recommended that Tollway provide additional training on the Illinois Procurement Code's reporting requirements to Board directors, executive-level staff, and any other employees with significant involvement in the procurement process.



In response, Tollway and the Governor's Office indicated that Tollway was updating training materials regarding conflicts of interest and reportable procurement communications and intended to conduct mandatory training sessions annually to the individuals recommended by the OEIG. Tollway also indicated that the Board member resigned shortly after issuance of this report and the Chief of Contract Services was counseled regarding the matter.

## *Document Falsification*

### OEIG Case No. 19-00547

DHS programs pay for Personal Assistants and Personal Support Workers (together, Individual Providers) to assist individuals with physical and developmental disabilities with household tasks and personal care so they may remain in their homes. Individual Providers verify their work hours by completing and submitting timesheets, which include certifications that they are submitting accurate time accounting. These timesheets explicitly warn that falsified information could lead to criminal prosecution.

After finding in a previous investigation that an employee of DHS reported working as a Personal Assistant during her regular DHS work hours, the OEIG self-initiated an investigation into whether other DHS employees working as Individual Providers billed for this work during their regular State work hours. The OEIG analyzed a sample of DHS employees that also served as Individual Providers over the time period of January 2018 through June 2019. From this sample, the OEIG found that 12 employees recorded hours worked in their capacities as Individual Providers during times in which they also reported working for DHS.

OEIG investigators interviewed the three DHS employees with the highest number of hours overlapping between their DHS hours and the hours they claimed to have worked as Individual Providers over the relevant time period, including:

***“All three of them also signed timekeeping records—on scores of occasions—that reminded them that they could face criminal penalties for reporting inaccurate hours. Nonetheless, all three of them continued to submit inaccurate timekeeping records for years; indeed, all three of them admitted that they continued to submit inaccurate timekeeping records well past the period analyzed by the OEIG in this case.”***

- » A Security Therapy Aide who reported working at a DHS facility at the same time he reported working as a Personal Support Worker on 80 occasions, accounting for over 530 hours, for which he was paid approximately \$11,592.75.
- » A Mental Health Technician who reported working as a Personal Assistant during times she was also signed in at a DHS facility on 99 occasions, accounting for over 475 hours, for which she was paid approximately \$6,240.
- » A Registered Nurse who reported working as a Personal Assistant at the same time she was signed into a DHS facility on 47 occasions, accounting for over 380 hours, for which she was paid approximately \$4,953.

During their OEIG interviews, all three employees admitted that they submitted Individual Provider timesheets reflecting they worked in that capacity during times when it would have been impossible for them to do so, as they were working at their DHS workplaces during those times, and that they continued to submit inaccurate timekeeping records well past the period analyzed by the OEIG in this case. The OEIG concluded that all three DHS employees thus submitted inaccurate timekeeping records for at least 18 months indicating that they worked as Individual Providers during times when they also reported working at their full-time DHS jobs, in violation of their Individual Provider agreements.

As a result, the OEIG recommended that DHS analyze the extent to which these three individuals, as well as other DHS employees who worked as Individual Providers, engaged in additional document falsification in 2020 and 2021 and then take whatever action it deemed appropriate with respect to these employees.

In response, DHS initiated disciplinary proceedings against the Registered Nurse, who resigned, and the Security Therapy Aide, who received a five-month suspension. DHS also established debts against the Registered Nurse and the Security Therapy Aide, as well as other DHS employees it found to have billed for hours they claimed they worked both as an Individual Provider and for DHS. In addition, the Illinois State Police (ISP) prosecuted the case against the Mental Health Technician. After the Mental Health Technician pled guilty to theft, she was ordered to pay restitution to DHS and was banned from participating in Medicaid programs; she also resigned from State employment.

## *Improper PPP Loans*

During FY2024, the OEIG investigated numerous State of Illinois employees who were alleged to have improperly obtained federal Paycheck Protection Program (PPP) loans, and determined that there was reasonable cause to believe that many of these State employees violated the State of Illinois Code of Personal Conduct and agency policy by obtaining PPP loans based on falsified information. Depending on each agency's policies, the OEIG often concluded that many of the employees also failed to report their outside business to the agency. If employees were still employed by the State at the time reports were issued, the OEIG recommended their termination from State employment. In response to these reports, the agencies pursued discipline. Most employees resigned in lieu of termination; for those who did not resign, they have either been terminated or the disciplinary actions are still ongoing. To-date, the Civil Service Commission (CSC) has upheld all of the PPP investigations conducted by the OEIG that were appealed to the CSC.

Seventeen of the PPP founded reports were made public by the EEC as of the end of FY2024, including:

### [OEIG Case No. 22-02597](#)

An Illinois Department of Healthcare and Family Services (HFS) Office Coordinator obtained a \$20,832 loan for a beauty salon that purportedly earned \$100,000 in income. In her interview, the employee admitted she had never owned a beauty shop, but claimed she owned an art and jewelry gallery, and admitted that she had earned at most \$6,000 from the business, and the income amounts on the PPP application materials were inaccurate. Although the employee said someone else applied for the loan on her behalf, she admitted she paid this individual for facilitating the application process, and provided her personally identifying information. She also admitted signing the application that contained the false information, and forwarding the loan forgiveness application to that individual to complete for her. The employee was terminated.

### [OEIG Case No. 23-00048](#)

A DHS Mental Health Technician obtained a \$20,830 loan for a beauty salon that had purportedly earned \$100,000 in income. In her interview, however, the employee admitted she never earned more than \$6,000 from her business in any one year and that the income amounts listed on the PPP application materials were thus inaccurate. Although the employee said someone else applied for the loan on her behalf, the employee paid this individual, provided her personally identifying and bank account information to the individual, and took no other affirmative steps to ensure the information being submitted to obtain a federal loan on her behalf was accurate. The employee also failed to report her business to DHS. The employee was terminated.

### OEIG Case No. 23-00059

A DHS Mental Health Technician obtained a \$20,102 loan for a beauty salon that had purportedly earned \$96,500 in income. In her interview, the employee made a number of contradictory statements regarding her purported income from doing hair, including that: she did not have any sources of income other than her State employment and she had not done hair in a salon since at least 2018; she had not done hair in a salon since at least 2019, and she did not make much money doing hair; in 2019 she made \$70,000 doing hair; and in 2019 she made \$80,000 doing hair. Under any of these versions, the employee admitted that the income amounts listed on the PPP loan application materials were incorrect. The employee also made contradictory statements regarding who filled out the PPP loan materials. Regardless of whether she filled out the application herself, or another individual did so on her behalf, the employee admitted that she should have more thoroughly reviewed it before signing it. The employee was terminated.

### OEIG Case No. 23-00061

A DHS Mental Health Technician obtained a \$20,832 loan for a beauty salon that had purportedly earned \$104,870 in income. In her interview, however, the employee admitted that she did not have any business or earn \$104,870 from any business in 2019, and the information on the PPP application materials was incorrect. Although the employee said other people applied for the loan on her behalf, the employee confirmed she provided the other people with her bank account information and a copy of her driver's license. Nevertheless, she did not confirm that the information being included in her loan documentation was accurate. In addition, the employee personally completed the loan forgiveness application. The employee was terminated.

### OEIG Case No. 23-00063

A DHS Mental Health Technician obtained two \$14,396 loans for a beauty supplies business that purportedly earned over \$69,000 in gross income. In her interview, the employee claimed the gross income amount was probably correct but said this information was based on records she provided to the individual who filled out the PPP loan applications on her behalf. Nevertheless, when repeatedly asked by the OEIG to provide such records, the employee failed to do so. In addition, subpoenaed bank statements for the account the employee said she used for her business did not reflect business income of the scale listed on the loan documents. While the employee said that she paid the individual to complete her applications, she admitted to being present during most of the application process, at least for the first loan, and to signing loan documents. She also failed to report her business to DHS. The employee was terminated.

## OEIG Case No. 23-00064

A DHS Mental Health Technician obtained a \$20,832 loan for a beauty salon that had purportedly earned \$108,000 in income. In her interview, the employee admitted that she did not have an operational business at the time of the loan, and that income amounts listed on the PPP application materials were inaccurate, but claimed she did not apply for the loan, did not give anyone permission to apply for it on her behalf, and denied knowingly spending the loan proceeds. However, despite suggesting possible identity theft at some point, the employee could not explain how someone would have obtained all of the personal information listed in the application and supporting materials, and admitted that no one else had access to her bank account. She also did not seem to express concern that someone misused her identity, nor did she indicate she took any steps to contact law enforcement regarding the purportedly unauthorized access and use of her personal identifying information.

The employee also claimed that she did not know whether the loan funds were deposited in her account (which is the same account into which her State salary was being deposited at that time), but activity in the employee's bank account suggested that she was in fact aware of the balances of her accounts and was tracking and managing those balances, and rapidly spending the PPP funds that had been deposited into her account. The employee also failed to report her outside employment to DHS. The employee was terminated.

## OEIG Case No. 23-00089

A DHS Mental Health Technician obtained a \$20,000 loan for a "Livestock Merchant Wholesaler" business that had purportedly grossed \$185,000 in income in 2019, and a \$3,026 loan for a child day care service that allegedly grossed \$14,525 in 2020. In her interview, however, the employee admitted that income amounts and other information in the first PPP loan application materials were inaccurate, and instead said that she had a home babysitting business at that time. Although the employee said someone else applied for the loan on her behalf, the employee paid this individual, provided her personally identifying and bank account information to the individual, and took no other affirmative steps to ensure the information being submitted to obtain a federal loan on her behalf was accurate. In addition, the employee admitted that she later learned the information submitted in her name was falsified, but she did not take steps to try to repay the loan. Instead, she personally completed a second application to obtain a second loan of \$3,026 and claimed that she provided her actual income with this request; however, the income amount reported here also was inconsistent with prior interview statements regarding her 2020 income. The employee also failed to report her business to DHS. The employee was terminated.

### OEIG Case No. 23-00099

A DHS Mental Health Technician obtained a \$20,606 loan for a beauty salon that had purportedly earned \$98,912 in income. In her interview, the employee admitted that her business did not exist until after she applied for the loan, she never earned more than \$4,000 in any one year, and that the income amounts on the PPP application materials were thus inaccurate. Although the employee said someone else applied for the loan on her behalf, the employee paid this individual and provided her personally identifying information to the individual, and she signed the application herself. The employee said the reported gross income amount on the loan materials was her State salary. The employee also failed to report her business to DHS within the required time period. The employee was terminated.

### OEIG Case No. 23-00109

A DHS Mental Health Technician obtained two loans totaling \$38,726 for a sole proprietorship, identified at one point as an Administrative Management and General Management Consulting Services business, and another time as a Landscaping Service business. The Schedule C forms submitted with the loans contained varying information regarding the employee's 2019 income. Specifically, the Schedule C submitted with the first loan reflected a 2019 gross income of \$134,226 and the Schedule C submitted with the second loan reflected a 2019 gross income of \$81,813. In his interview, however, the employee admitted that both of the gross incomes listed in the loan materials were incorrect, saying that an estimated income of even \$50,000 was way too much for his actual business of moving furniture and performing odd jobs. The employee said he paid an individual to apply for the first loan on his behalf, but it did not appear that he took any reasonable steps to ensure the information submitted on his behalf was accurate. The employee said he applied for the second loan himself and claimed that he may have combined his State income with his income from his secondary employment on those application materials. The employee also failed to report his business to DHS. The employee was terminated.

### OEIG Case No. 23-00112

A DHS Mental Health Technician obtained a \$20,832 loan for a car washing business that had purportedly earned \$110,000 in gross income. In his interview, however, the employee admitted that he earned no money from his auto detailing business, never had a customer, never reported any business to DHS as secondary employment, and the income amounts listed on the PPP application materials were inaccurate. The employee confirmed that he completed the application and forgiveness materials himself, including putting a random income amount on the application "to see what [he] could get." The employee was terminated.

## OEIG Case No. 23-00119

A DHS Mental Health Technician obtained a \$20,000 loan for a residential remodeling independent contracting business that purportedly earned \$96,000 in income. During her OEIG interview, she admitted to having no such business and said that the information was false, adding instead that she only occasionally did aesthetician and hair work which earned at most \$20,000 per year. The employee said she met someone on social media who applied for the loan on her behalf, and she admitted to sending personal information to the individual and agreeing to pay them half of the loan proceeds. The employee claimed to have believed initially that the \$20,000 was a grant but said that after becoming aware that the funds were from a loan, she still proceeded to apply for loan forgiveness herself. She also failed to report her secondary employment to DHS and was terminated.

## OEIG Case No. 23-00134

A DHS Mental Health Technician obtained a \$21,330 loan for a healthcare consulting business that had purportedly earned \$129,867 in income in 2019. In her interview, however, the employee stated she did not have a healthcare consulting business, though she claimed she instead operated an event planning business. The employee admitted the most money the event planning business ever earned in a year was \$50,000 to \$60,000, and acknowledged that the income amounts listed on the PPP application materials were thus inaccurate. Although the employee said someone else applied for the loan on her behalf, the employee paid this individual with money from the loan proceeds, provided her personally identifying and banking information to the individual, and personally signed and initialed the loan application after she looked it over. The employee also failed to report her business to DHS. The employee was terminated.

## OEIG Case No. 23-00135

A DHS Mental Health Technician obtained a \$20,833 loan for a business association or consulting business that had purportedly earned \$106,600 in income. In her interview, however, the employee admitted she never operated a business of any kind and that the income amounts listed on the PPP application materials were fabricated. Although the employee said someone else applied for the loan on her behalf, the employee authorized this individual to complete the loan application; provided her personally identifying and bank account information to the individual; did not make any efforts to rectify any inaccuracies in the loan documents; and thereafter used the funds for her own personal expenses. The employee also failed to report unrelated secondary employment at another employer to DHS. The employee was terminated.

## OEIG Case No. 23-00152

A DHS Mental Health Technician obtained a \$21,558 loan for a home health care services business that had purportedly earned \$113,479 in income. In her interview, however, the employee admitted that income amounts and other information in the PPP application materials were inaccurate, and claimed that she actually had a carpet cleaning business that earned around \$17,000 in the year listed. Although the employee said someone else applied for the loan on her behalf, the employee paid this individual, provided her personally identifying and bank account information to the individual, and took no other affirmative steps to ensure the information being submitted to obtain a federal loan on her behalf was accurate. The employee was terminated.

## OEIG Case No. 23-00165

A DHS Mental Health Technician obtained a \$20,832 loan for a property management business that had purportedly earned \$122,124 in income. In her interview, however, the employee admitted she never earned more than \$29,000 from her business in any one year and that the income amounts listed on the PPP application materials were thus inaccurate, as was the description of her business, since she actually had a home health care business. Although the employee said someone else applied for the loan on her behalf, the employee paid this individual, provided her personally identifying and bank account information to the individual, signed "something" relating to the loan, and took no other affirmative steps to ensure the information being submitted to obtain a federal loan on her behalf was accurate. The employee also failed to report her business to DHS. The employee was terminated.

## OEIG Case No. 23-00166

A DHS Mental Health Technician obtained a \$20,207 loan for a home health care service for seniors that had purportedly earned \$97,000 in income in 2020. In her interview, however, the employee admitted she did not make any income from her home health services business in 2020 or 2021, and made just \$3,300 in 2019. The employee acknowledged that the income amounts listed on the PPP application materials were thus inaccurate. Although the employee initially stated that she filled out the PPP loan application herself, she later said she provided her information to someone else, who applied for the loan on her behalf while she was present and with her permission; regardless, she also said she personally signed and submitted the loan application, and signed the forgiveness application. The employee also failed to report her business to DHS. The employee was terminated.



A DHS Mental Health Technician obtained two \$13,900 loans for a catering business that had purportedly earned \$5,560 in average monthly payroll; \$66,730 in gross income; and \$96,442 in gross receipts or sales. In her interview, however, the employee admitted she never earned more than \$1,000 in any year from her business selling baked goods and small plates of food, and printing t-shirts, and the income amounts listed on the applications were inaccurate. Although the employee said someone else applied for at least the first loan on her behalf, the employee paid this individual, provided her personally identifying and bank account information, and chose not to verify the information on the first application was correct despite the fact that she signed the application.

While the employee denied knowing about the second loan at all, she said the same person who completed the first loan might have completed the second application, and indicated that she checked her bank account on a daily basis. Bank records confirmed that the second loan was deposited into her account; she had a balance of less than \$1,200 on the day prior to the deposit of the second loan; and more than \$8,000 was withdrawn or transferred out of her account on the same day the second loan was deposited. The employee also failed to report her business to DHS. The employee was terminated.

## Failure to Cooperate & PPP

OEIG Case No. 23-00127

***“Both DHS policy and the Ethics Act require employees to provide full and truthful cooperation with OEIG investigations, as a condition of their employment. Additionally, State employees are expected, at minimum, to maintain the public’s trust and confidence.”***

Records showed that a DHS Mental Health Technician obtained a \$20,832 loan for a beauty salon that had purportedly earned \$113,971 in income. In her interview, the employee denied owning the business listed in the application, and denied filling out the PPP loan application or giving anyone permission to fill out the application on her behalf. The employee also claimed she did not think she received the loan funds and noted that she received another large deposit to her bank account around the same time from life insurance proceeds. She also suggested she may have been “hacked” but yet continued to use the same bank account as of the day of her interview, and her State salary was still deposited into it.

However, the OEIG determined that the employee’s claims of ignorance were not credible after obtaining and reviewing the employee’s bank records, which confirmed that a \$10,148 deposit was made to her account on May 7, 2021, but almost all of that amount was transferred or spent out of her account before the \$20,832 PPP

deposit was made to her account later the same month. Of note, the PPP deposit was described in the bank statements as “PPP funding” and “SBA funding.” In addition, the spending and transaction history in the bank records following the deposit of the loan proceeds also suggested the employee’s awareness, at minimum, of the loan proceeds, as they were spent within five days of their deposit. Moreover, the employee was the only authorized user of this bank account.

Ultimately, the OEIG concluded that the employee was aware of, and accepted, loan proceeds obtained with false information; and thus, her statements to OEIG investigators to the contrary demonstrated a failure in her obligation to provide full cooperation with an OEIG investigation by providing only “truthful and complete” statements and conduct unbecoming of a State employee, in violation of DHS and State of Illinois policies on employee conduct. The employee also failed to report unrelated secondary employment to DHS. DHS terminated the employee.

# Hiring & Employment Monitoring (HEM) Division

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The Executive Inspector General created the Hiring & Employment Monitoring (HEM) Division in 2016 to fulfill the OEIG's statutory mandate to "review hiring files and employment files of each State agency within its jurisdiction to ensure compliance with *Rutan v. Republican Party of Illinois* . . . and with all applicable employment laws." 5 ILCS 430/20-20(9). In accordance with this statutory authority and the State's Comprehensive Employment Plan (CEP), HEM conducts compliance-based, non-investigative reviews of State hiring and employment processes and decisions and provides recommendations, which it assists in implementing to help improve State hiring.

## Desk Audits and Hiring Sequence Monitoring

HEM utilizes several methods to evaluate whether the State's hiring practices and processes continue to comply with the CEP and other governing authority, including conducting desk audits and engaging in hiring sequence monitoring.

HEM selects hiring sequences to audit or monitor based on HEM's review of agency postings in SuccessFactors, from communication with CMS Compliance or State human resources personnel, or in relation to complaint referrals, discussed further below. Sequences are also selected in the course of HEM-initiated systemic reviews that may evaluate issues across agencies or across divisions or sections within a particular agency.

**This fiscal year, HEM conducted 54 desk audits.**

When conducting a desk audit, HEM reviews all documentation related to the sequence - including relationship disclosures, validation and screening decisions, interview notes, candidate scores and rankings, and offers - to ensure the selection decision was merit-based and justifiable.

In 43 of these desk audits, HEM found that the hire was justifiable and did not make any recommendations. Additionally, in FY2024, HEM conducted desk audits at five State entities that had never been audited before: Criminal Justice Information Authority, Council on Developmental Disabilities, Arts Council, Commission on Equity and Inclusion, and Property Tax Appeal Board. In total, HEM conducted desk audits of hires at 33 different State entities.

**HEM monitored 11 hiring sequences at ten different State agencies.**

When monitoring a hiring sequence, HEM works with CMS and the agency to monitor each step in the hiring process. This includes reviewing the work that occurred before the agency posted the position, such as the position description, application questions, and interview questions. HEM

then monitors the hiring process which may include CMS's minimum qualifications validation, the agency's Subject Matter Expert review that screens applicants further, the selection of the interview pool, and the interviews, including scoring discussions.

## Complaint Referrals

**The OEIG referred 39 complaints to HEM for compliance review.**

A complaint is often referred to HEM if it involves allegations of CEP violations or a breach of a hiring-related directive, procedure, or policy. HEM's compliance function and knowledge of State hiring procedures allow HEM to efficiently evaluate whether a hiring sequence was conducted appropriately. If a violation is discovered that may have impacted the outcome of a hiring sequence, HEM can and often does intervene before, during, or shortly after the violation occurred to remedy the issues and prevent further problems from occurring. Following is a synopsis that illustrates the efficacy of HEM's work to remedy issues that did not stem from employee misconduct.

**HEM issued 20 Advisories based on complaint referrals in FY2024.**

This fiscal year, HEM finalized and issued Advisories for 20-HEM-0106 and 22-HEM-0049, which represented a years-long review that HEM opened in response to multiple complaint referrals and resulted in several improvements in the hiring process for the Shift Supervisor title at the Illinois Department of Corrections (DOC).

During this review, HEM worked with DOC and CMS to improve the Shift Supervisor screening process, which included adding clarifying language to the minimum requirements. Additionally, the position description was updated to include four preferred qualifications.

As another improvement, during the validation step of the process, CMS created a document containing a list of DOC titles that CMS and DOC agreed included experience supervising correctional employees – a previously inexact component of the screening – which provided further clarity and consistency to the process.

During HEM's monitoring of the first six requisitions to use the new screening criteria, HEM found that there remained confusion regarding some applicants, particularly those using legacy "grades" – even after clarified language was added. In response, CMS and DOC confirmed that following the receipt of the HEM Advisory, the class specification clarification was submitted to the Illinois Civil Service Commission, which approved the clarification on May 16, 2024. The CMS Hiring Resource Team will provide written notification to any employee with an existing promotional grade maintained in the legacy mainframe. According to DOC, postings for Shift Supervisor positions will note that legacy grades and/or applicant validations completed prior to May 15, 2024 are no longer valid.

For years, CMS validators, DOC human resources staff, and DOC subject matter experts used varying interpretations of "supervisory experience" and evaluated Correctional Sergeant experience

differently. The changes made during and as a result of this review are aimed to resolve the confusion and inconsistency regarding the minimum requirements and screening criteria and misapplication of qualifications for this position. Additional HEM Advisory summaries can be found in the HEM Quarterly and Annual Reports located on the [OEIG Website](#).

## Exempt List Appointments and Determinations

HEM oversees appointments and changes to the State's Exempt List, a finite list of positions for which hiring decisions may be made on the basis of political or other non-merit factors, assuming the candidates in these positions meet the minimum qualifications set forth in the respective position descriptions. These positions are primarily responsible for policymaking, such that political consideration is an appropriate consideration for effective performance of the work.

**HEM reviewed 338 exempt appointment packets.**

HEM reviews all appointments of individuals to Exempt List positions as set forth in the CEP. Prior to an individual starting in an exempt position, HEM reviews certification paperwork to ensure the proposed candidate meets the minimum qualifications of the specific position being filled. The Exempt List is posted publicly on CMS's website [here](#), and updated monthly.

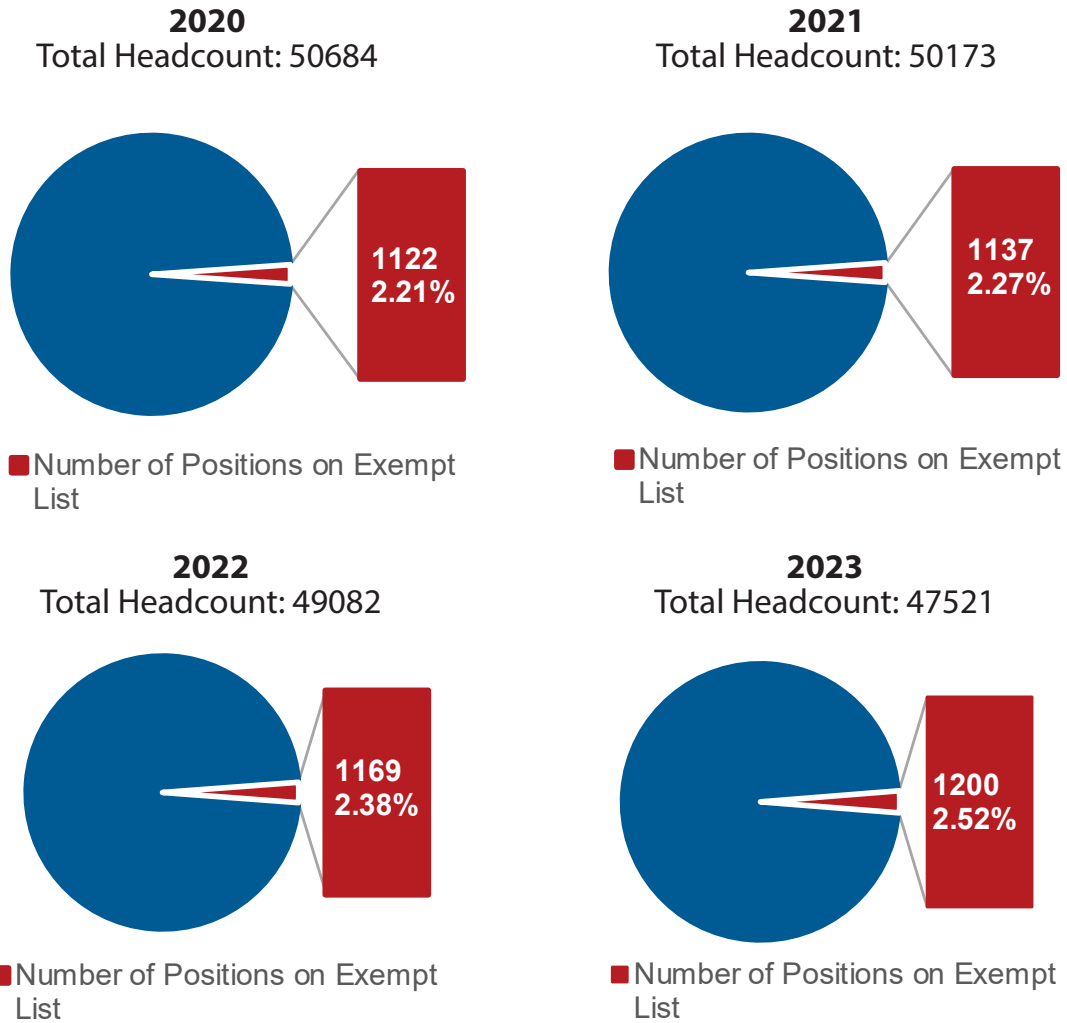
**HEM made 55 determinations regarding Exempt List changes requested.**

Changes to the Exempt List are submitted by CMS, on behalf of the Governor's Office, and are often due to changing Administration priorities, new agency mandates, and/or agency reorganizations. HEM reviews all Exempt List modification submissions and recommends approval of or objection to the proposed change to the EIG, who must respond within 10 business days. In vetting these submissions, HEM does not limit itself to a strict assessment of whether the duties are exempt in nature such that political affiliation is an appropriate consideration – it conducts an in-depth, comprehensive review of all available information related to the position and request, including the basis for the request, any related statutory or other authority, supervisory and subordinate reporting structures, and minimum and preferred qualifications. HEM also reviews the Exempt List to determine the agency's percentage of exempt positions and assess whether any existing exempt positions within the agency – particularly any vacant positions – could perform the duties of the proposed position or are no longer needed such that removal from the Exempt List is appropriate. Prior to making a final recommendation, HEM routinely communicates or meets with agency staff regarding questions about the proposed position's history, duties, reporting structure, and necessity.



# Exempt List Totals

Because HEM is consistently guided by the need to keep the Exempt List narrow, it also tracks and considers how many positions have been added Statewide. Since the original Exempt List was finalized in 2019, the Exempt List has gained a total of approximately 120 positions, which also correlates with an increase in agency headcounts, that has resulted in the overall percentage of exempt positions to remain consistently at 2 – 3%.



# Political Contacts

**HEM received 13 political contact reports.**

A political contact is a contact in any form from an elected or appointed politician, or anyone acting on their behalf, regarding hiring or employment actions related to any non-exempt State position. The CEP requires any State employee who receives a political contact to notify the CMS Chief Compliance Officer or HEM within 48 hours. State employees may report political contacts to CMS Political Contact Reporting, to which HEM has access. Additionally, anyone, including non-State employees, may report a political contact to the OEIG by submitting a complaint through the OEIG Website: [File a Complaint](#).

# Advisories

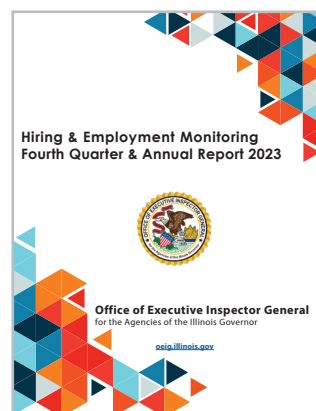
**HEM issued a total of 81 Advisories to 36 different agencies.**

At the conclusion of a hiring review, HEM issues a written Advisory to the hiring agency and CMS. HEM also forwards a copy of each Advisory to the Governor's Office. The Advisory includes a summary of the hiring sequence and any recommendations to the agency to improve compliance going forward. Some Advisories result in HEM finding that the agency's selection for the position was merit-based and justifiable without any recommendations, but other Advisories may contain recommendations that identify and discuss hiring issues that need to be addressed. In FY2022, CMS began uploading all HEM Advisories to a SharePoint site available to all agency human resources personnel so that agencies other than the hiring agency can also access and learn from HEM's recommendations.

## Quarterly and Annual Reports

As required by the CEP, HEM has issued 18 quarterly reports, four of which are combined in the HEM Annual Report, since FY2019. These reports contain data and more detailed information pertaining to HEM's and Investigations' hiring-related work during the calendar year reporting period, including but not limited to:

- » Hiring-related reviews opened, desk audits completed, hiring sequences monitored, and hiring reviews transferred from HEM to Investigations.
- » Advisories issued, and a summary of recommendations made, if any.
- » Exempt positions approved for addition to or deletion from the Exempt List, and dispositions for all exempt Personal Services Contracts (PSCs) requests received.
- » Hiring-related complaints received, and a breakdown of those referred intra-Office to HEM, back to the subject agency or other appropriate entity or law enforcement authority, or opened by the OEIG Investigations Division.
- » Status of investigations into hiring-related complaints as of the end of the applicable reporting period.



All of [HEM's Quarterly and Annual Reports](#) are available on the [OEIG website](#).

# Revolving Door

The revolving door provisions of the Ethics Act prohibit State employees from accepting non-State employment with, or receiving compensation from, a non-State entity, for “one year immediately after termination of State employment” if, within one year immediately prior to separation from State employment, the employee participated personally and substantially in the award or fiscal administration of State contracts, change orders, or grants with a cumulative value of \$25,000 or more to his or her prospective employer, or in a regulatory or licensing decision directly applicable to his or her prospective employer. 5 ILCS 430/5-45(a) and (b).


## OEIG Revolving Door Provisions for C-List Employees

Certain State employees whose positions may have the authority to participate personally and substantially in such decisions must seek a determination from the OEIG that they may accept employment prior to accepting an offer. These employees are on what is known as the c-list (after subsection (c) of Section 5-45 of the Ethics Act). Ethics officers for agencies are generally responsible for maintaining and updating their agency’s c-list.

C-list employees should be notified in writing by their agency of their designation and obligations pursuant to the Ethics Act. The duty to seek a determination from the OEIG continues for one year after ending State employment.

## Submitting an RD Application

To notify the OEIG about a prospective job offer, employees should go to the OEIG’s website and follow the revolving door instructions. Initially, the employee and his or her ethics officer must complete certain forms regarding the employee’s State duties and prospective employment (the “RD-101” and “RD-102”).



### Revolving Door Notification of Offer (RD-101)

(Please print or type)

Please note that, if your state position has been identified as being subject to Section 5-45(c) of the State Officials and Employees Ethics Act, 5 ILCS 430/5-45(c), you are required to submit this form to the OEIG, notify your state employer's ethics officer, and receive a determination from the OEIG before accepting any new offer of employment or any new offer from a prospective client that you receive during the period extending to one year after the date of termination of your state employment.

**I. Personal Information**

State employee's or former state employee's full name\*:

\*"State employee" includes employees of the Regional Transportation Authority, the Chicago Transit Authority, Metra, and Pace.

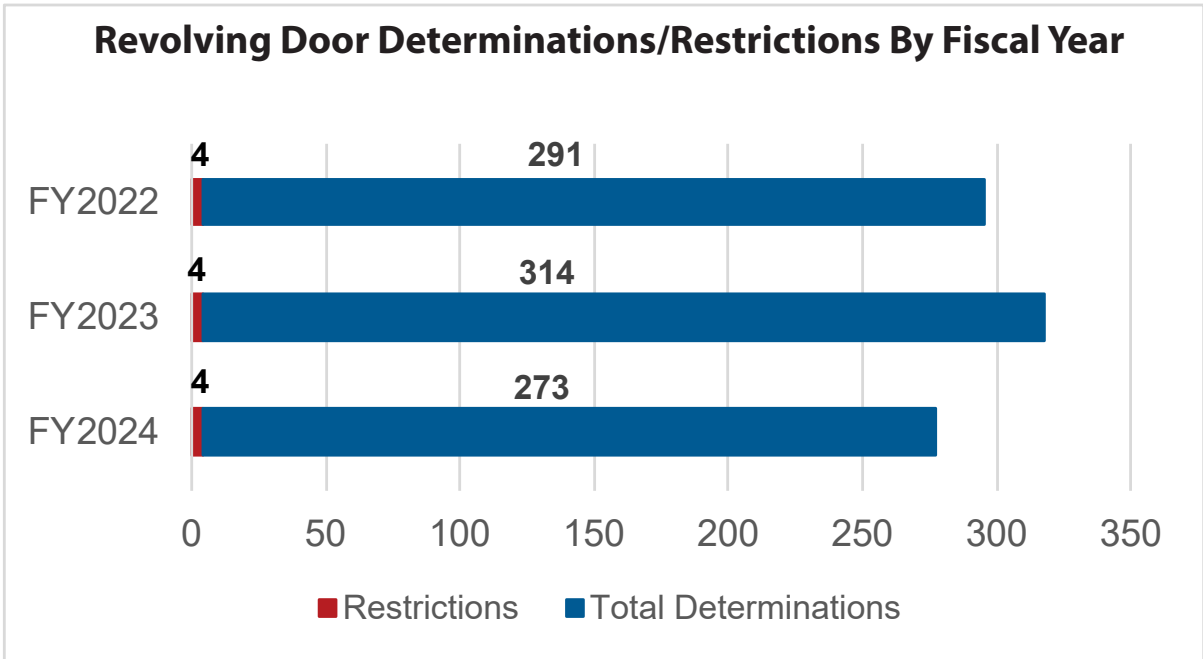
Personal street address: <input type="text"/>	City: <input type="text"/>
State: <input type="text"/> Zip code: <input type="text"/>	Home phone: <input type="text"/>
Personal cell phone: <input type="text"/>	State work phone or cell phone: <input type="text"/>
Personal e-mail: <input type="text"/>	State e-mail: <input type="text"/>
Date of hire by state: <input type="text"/>	Date of birth: <input type="text"/>



Within 10 calendar days of receiving the forms from both the employee and the ethics officer, the OEIG issues a determination indicating whether the employee “personally and substantially” participated in the award or fiscal administration of a State contract or a regulatory or licensing decision that directly applied to the prospective employer or its parent or subsidiary, and thus, whether the employee can accept the employment offer. In making a determination, OEIG staff will review information from these forms and conduct interviews of the employee, the employee’s supervisor, and others, as necessary. The OEIG also examines various records relating to any contracting, regulatory, or licensing decisions involving the employee.

**During FY2024, the OEIG made 273 revolving door determinations using the process described above.**

The OEIG restricted four employees from accepting non-State employment, which is approximately 1.5% of the determinations made.



### Appeal of OEIG Determination

The OEIG’s determination may be appealed to the EEC by either the affected employee or the Attorney General no later than 10 calendar days after the date of the determination. The EEC must then issue its decision within 10 calendar days. Therefore, the OEIG’s determination is not final until the time to appeal has expired or the EEC has made its decision on an appeal.

In FY2024, one employee appealed the OEIG’s restricted determination to the EEC. The EEC upheld this determination. Although OEIG’s revolving door determinations are generally not public, when a determination is appealed to the EEC, the EEC’s decision of the appeal is made public. The appeal in FY2024 is summarized on the following page.

## 24-EEC-003

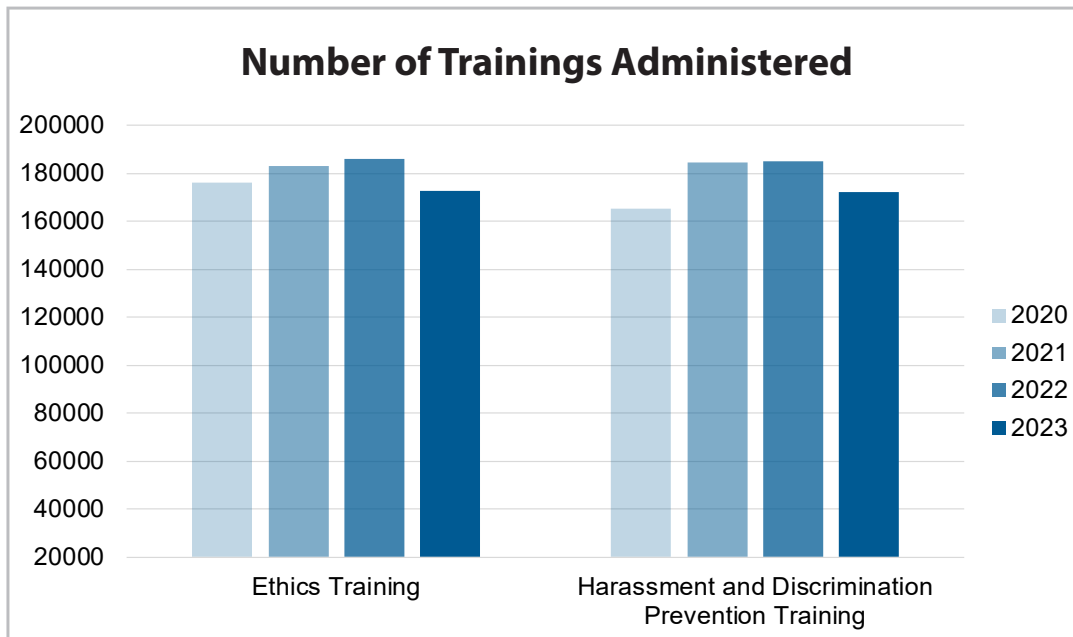
The Illinois State Board of Education (ISBE) renewed three intergovernmental agreements (IGAs) with West 40 Intermediate Service Center (WISC) in May and July 2023, as well as awarded it a grant under the federal Emergency Assistance for Non-Public Schools (EANS) in May 2024.

On May 31, 2024, Jeffrey Aranowski, who had been employed as the Executive Director for the Center for Safe & Healthy Climate at ISBE, submitted an RD-101 to the OEIG seeking to work for WISC. Mr. Aranowski had resigned from ISBE as of May 23, 2024, and had been offered a position at WISC with a start date of July 1, 2014, and an annual salary of \$150,000. The OEIG restricted Mr. Aranowski on the bases of his personal and substantial involvement in the award and fiscal administration of the IGAs and his personal and substantial participation in the EANS grant. Mr. Aranowski appealed the restricted determination to the EEC.

On appeal, the EEC affirmed the OEIG's restricted determination. The EEC concluded that Mr. Aranowski personally and substantially participated in the renewals of the IGAs within the restricted period. The record evidence was that Mr. Aranowski approved the IGA renewals. The EEC found that there was contradicting evidence about Mr. Aranowski's participation in the award of the EANS grant, and concluded there was insufficient evidence in the record to restrict on that basis.

# Training

The OEIG is statutorily required to oversee ethics training and harassment and discrimination prevention training for the entities under its jurisdiction. Each year, the OEIG oversees these two trainings for all of the agencies under the Illinois Governor, the nine State universities, and the Regional Transit Boards (RTBs), who are required to take training annually. New employees, appointees, and officials are required to take these trainings within 30 days of commencing their employment.



## Mandatory Training Under the Ethics Act

The ethics training and harassment and discrimination prevention training are tracked by calendar year. In calendar year 2023, these trainings were administered primarily through OneNet, an online training platform maintained by the Illinois Department of Innovation & Technology (DoIT). Using a State training platform instead of an outside vendor saves taxpayer funds and maintains consistency for State employees who use that platform for other trainings.



## Ethics Training

Each year, the OEIG drafts and designs the ethics training for the agencies under the Governor and the RTB Boards. The OEIG works to utilize relevant examples and plain language to train on important topics such as revolving door, gift ban, hiring improprieties, procurement fraud, secondary employment, prohibited political activity, and more. For agencies under the Illinois Governor, the OEIG directly provided more than 60,000 online ethics training sessions in calendar year 2023.

In addition to developing ethics training, the OEIG also drafts the ethics training standards to ensure quality training programs that cover relevant ethics laws and rules.

Further, the OEIG reviews ethics training programs created by entities under its jurisdiction and approves those trainings. In calendar year 2023, the OEIG reviewed and approved 23 ethics training programs. For all entities under the OEIG's jurisdiction, it was reported that individuals completed over 172,000 ethics training sessions during calendar year 2023.

## Harassment and Discrimination Prevention Training

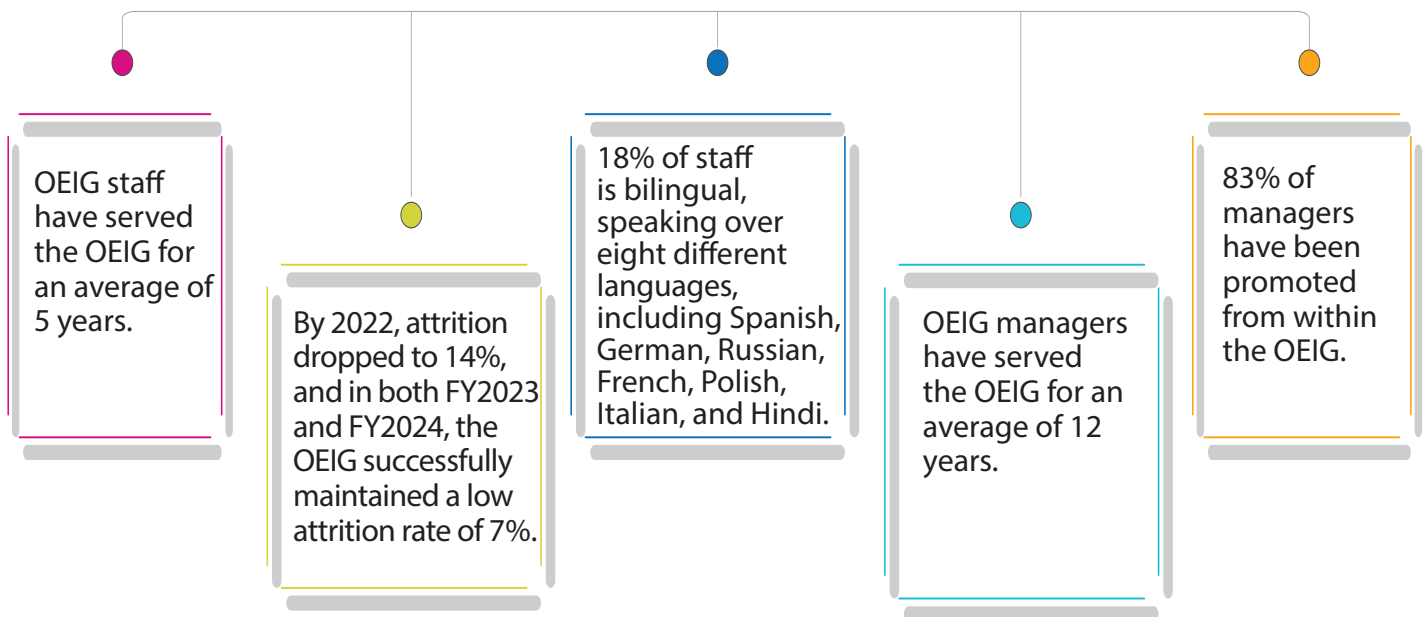
Since 2022, the OEIG has overseen the harassment and discrimination prevention training for the agencies under its jurisdiction. This training was previously limited to sexual harassment training, but was expanded to include discrimination, harassment, and sexual harassment under the Illinois Human Rights Act. As part of overseeing this training, the OEIG works closely with entities under its jurisdiction to ensure they understand the training requirements outlined in the Ethics Act, as well as any amendments to the Illinois Human Rights Act. For example, before the 2024 training commenced, the OEIG sent letters detailing the training requirements, recent legal changes that impact the training, and sample training materials to assist entities in drafting their trainings. Throughout the year, the OEIG sent reminders regarding training deadlines.

In calendar year 2023, the OEIG reviewed and approved 23 harassment and discrimination prevention training programs. For all entities under the OEIG's jurisdiction, it was reported that individuals completed over 172,000 harassment and discrimination prevention training sessions during calendar year 2023.

# OEIG Personnel & Operations Staff

The Office of Executive Inspector General employs a dedicated group of public servants who are resolute in the agency's mission to serve the interests of the public by ensuring accountability in State government. The OEIG is devoted to the highest standards of quality and professionalism and is committed to safeguarding governmental operations, which directly impacts those we serve.

We are committed to creating a diverse, equitable, inclusive, and accessible workplace. That commitment establishes a workplace culture that values each employee and their part in creating better State government.



## Professional Backgrounds

While the OEIG focuses on investigative, compliance, and training work, our employees' various professional backgrounds and experiences bring diverse perspectives to our work. For example, many of our employees have completed degree programs in criminal justice and political science, but other areas of study have included biology, business, communications, East Asian studies, information technology, journalism, law, philosophy, and sociology.

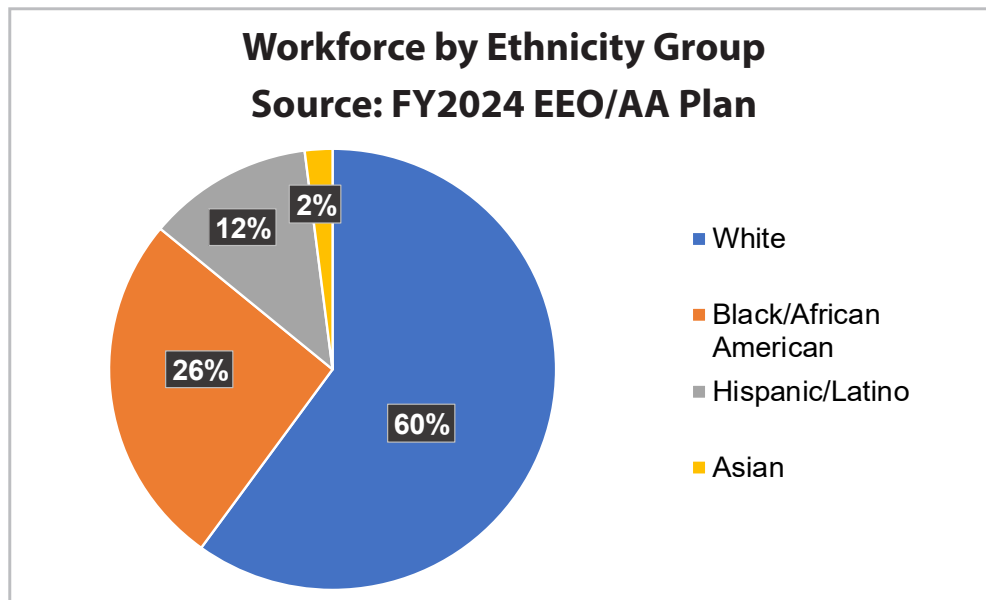
In addition, staff members, depending on their specific position, may have certificates as an Investigator, Interviewer or Fraud Examiner, or may be licensed as a paralegal or an attorney.

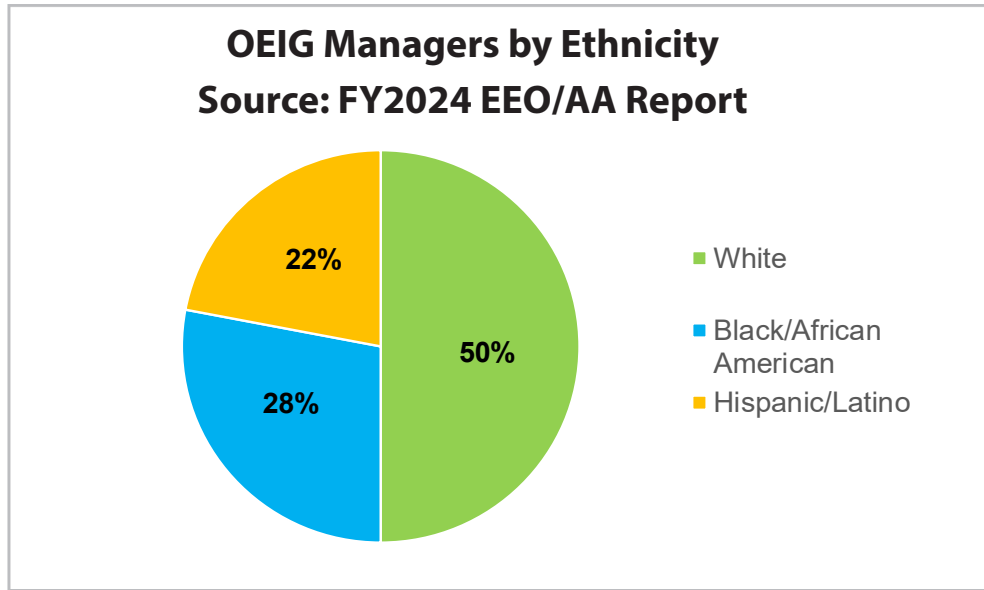
Some current and previous OEIG employees have the following professional backgrounds and experiences:

- » Judicial Law Clerk
- » Law enforcement operations and administration
- » Military
- » Information technology
- » Court advocates
- » Attorney in private practice and the public sector
- » Internal investigations in public and private sector
- » Prosecutor
- » Human Resource professional
- » Administrative Law Judge
- » EEO Investigator
- » Accountant
- » Probation Officer

## EEO/AA Report

In FY2024, our Equal Employment Opportunity/ Affirmative Action report reflected the following Equal Employment Opportunity categories set forth in Illinois law.





*This limited information is compiled for purposes of complying with state, federal, and equal employment opportunity laws. The OEIG acknowledges that these categories are not inclusive of all identities, including, but not limited to, where employees identify with one or more races.*

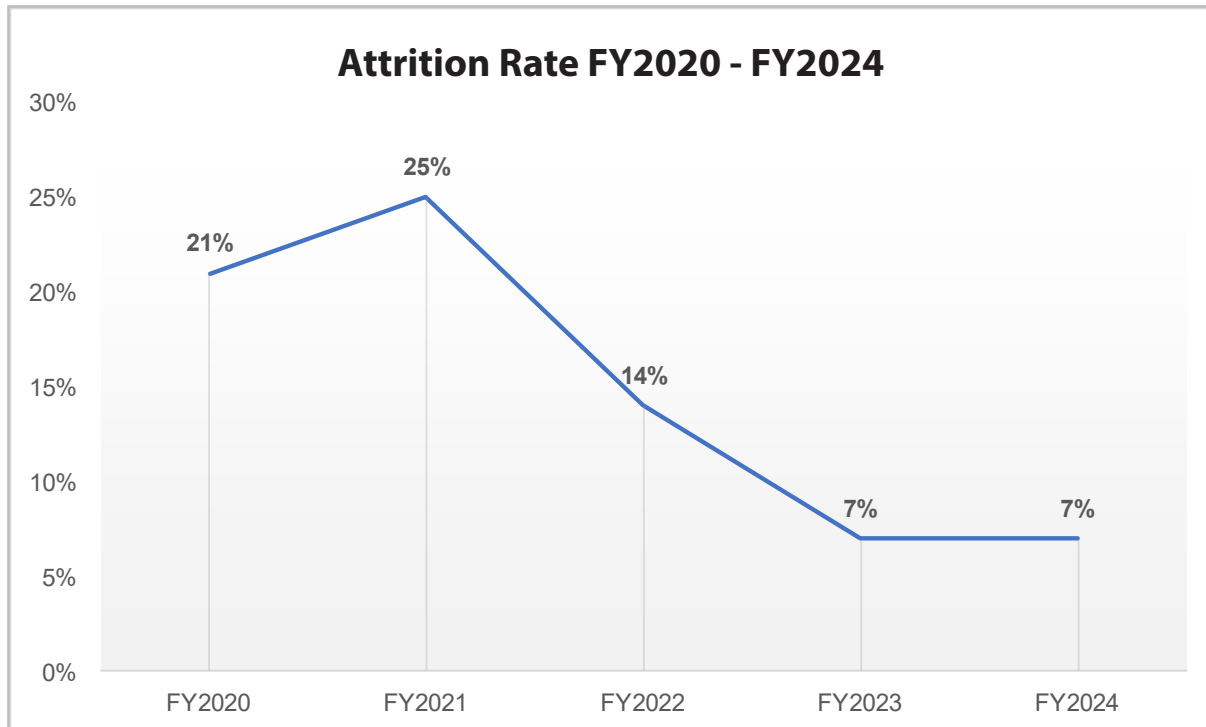
## Language Fluency

OEIG staff have fluency in several languages. Indeed, 18% of staff is bilingual, speaking over eight different languages. Those languages include:

- » Spanish;
- » German;
- » Russian;
- » French;
- » Lithuanian;
- » Polish;
- » Italian; and
- » Hindi.

# OEIG Attrition Rate

Over the past five years, the OEIG has made significant strides in improving employee retention, as evidenced by the steady decline in our attrition rate. By 2022, attrition dropped to 14% and in both FY2023 and FY2024, we successfully maintained a low attrition rate of 7%. This positive trend underscores our commitment to retaining top talent and ensuring a stable and motivated workforce dedicated to upholding the integrity and mission of the office.



## Executive Staff

Susan M. Haling was first appointed as Executive Inspector General (EIG) in March 2018. The Illinois Senate confirmed the appointment of Ms. Haling to her second term on April 11, 2024 as Executive Inspector General for the term ending on June 30, 2028.

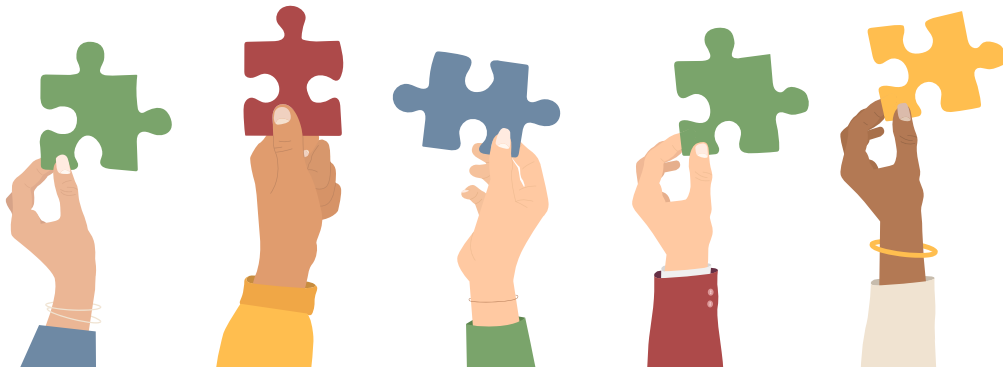
The OEIG's executive leadership team also includes:

- » Neil P. Olson, General Counsel
- » Fallon Opperman, Deputy Inspector General and Chief of Chicago Investigative Division
- » Erin K. Bonales, Director of Hiring & Employment Monitoring Division
- » Christine P. Benavente, Deputy Inspector General - Executive Projects
- » Angela Luning, Deputy Inspector General and Chief of Springfield Investigative Division
- » Ogo Akpan, Chief Fiscal Officer and Operations Manager



# DEIA Update

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The OEIG maintains an active internal Diversity, Equity, Inclusion, & Accessibility (DEIA) Working Group. This Working Group is comprised of OEIG employee volunteers from each division who work together to brainstorm, research, and implement steps to make the OEIG a more inclusive and equitable working environment that celebrates differences. The DEIA Working Group's focus areas include: 1) recruitment & hiring; 2) training; 3) mentorship & development; and 4) employee connection.

Although the OEIG has a DEIA Coordinator, the structure of the group is open to allow all members to share in the leadership and development of the Working Group. In this collaborative environment, we work to ensure that our methods for implementing our goals are thoughtful, grounded in research, and have been discussed and agreed upon by the group. While we continuously work toward setting and meeting goals, our accomplishments in FY2024 are noteworthy.

For more information about the DEIA Working Group, please see the OEIG's website. It contains the DEIA Working Group's previous year-end reports, among other information. For a direct link to the Diversity, Equity, Inclusion, and Accessibility page, click [here](#).

# Highlights of the DEIA Working Group

Reestablished the internship program and hosted legal and investigative interns.

Updated OEIG position descriptions to ensure they are written with a focus on inclusivity.

Established an internal mentorship program that is open to all OEIG employees.

Standardized the onboarding of OEIG employees.

Expanded where the OEIG posts employment opportunities by over 50%.

Developed OEIG Connect – an internal voluntary group that meets to discuss issues related to marginalized groups and identities.

Conducted office-wide surveys to obtain input and feedback about DEIA initiatives

Researched and implemented best practices for accommodations policies, employment applications, and processes.

Hosted events to allow staff to share more of their identity and connect with each other.

Provided leadership training to managers.

Developed a New Employee Day for newer OEIG employees to connect and learn more about the OEIG's history.

Attended job fairs to expand recruitment efforts.

Created strategic plans for the DEIA Working Groups.

Facilitated all staff trainings

Established a monthly bulletin of all important dates of recognition.

## Recruitment & Hiring

During FY2024, the Working Group continued to bring DEIA best practices to recruitment and hiring efforts. Specifically, the Working Group: hosted an inaugural New Employee Day; made updates to our website to accommodate persons with disabilities; reestablished the internship program; and continued to cast a wide net for posting employment opportunities and attended job fairs as part of recruitment efforts.

Below is more information about these projects.

- » The Working Group hosted our first New Employee Day. On August 9, 2023, the Chicago office Working Group employees hosted newer employees for a half day of events. The focus of New Employee Day was to provide connection and integration in the office. Eleven employees who started within the past year attended. The event included small group conversations with managers, a scavenger hunt with tasks aimed at learning about the office and interacting with coworkers, and a presentation regarding OEIG history. All staff were invited to an after-work social event.
- » The Working Group updated the descriptions of alternative text for images on the OEIG's website. Alternative text, sometimes referred to as "ALT text," is when text is used to describe an image for those who are unable to see or interpret it on their own. After researching best practices, we reviewed the OEIG's alternative text descriptions and made some recommendations that our IT department implemented.
- » The Working Group reestablished the internship program. A team of volunteers outlined the logistics for the program, including resources needed, recruitment strategy, and program structure. After completing this planning, the OEIG posted the intern opportunities and interviewed potential interns. This past fiscal year we hosted three investigative interns and a legal intern.
- » The Working Group discussed and brainstormed methods for recruiting new staff and then members attended job fairs.

## DEIA Training

In February 2024, the DEIA Working Group hosted a Wellness Recovery Action Planning (WRAP) workshop presented by Nanette Larson, Deputy Director of Wellness & Recovery Services at DHS. The training was designed to provide staff with tools to develop strategies to support their individual wellness. Participants learned six foundational principles that work together to create a strong foundation of wellness and began to develop their own plan. The training was held in-person on separate days in the Chicago and Springfield offices. Almost everyone in the office was able to attend this interactive workshop.

After the workshop, the Working Group anonymously surveyed participants about their experience. Almost all respondents rated the training as "excellent" and the other rating was "good." Some of the comments on the survey included:

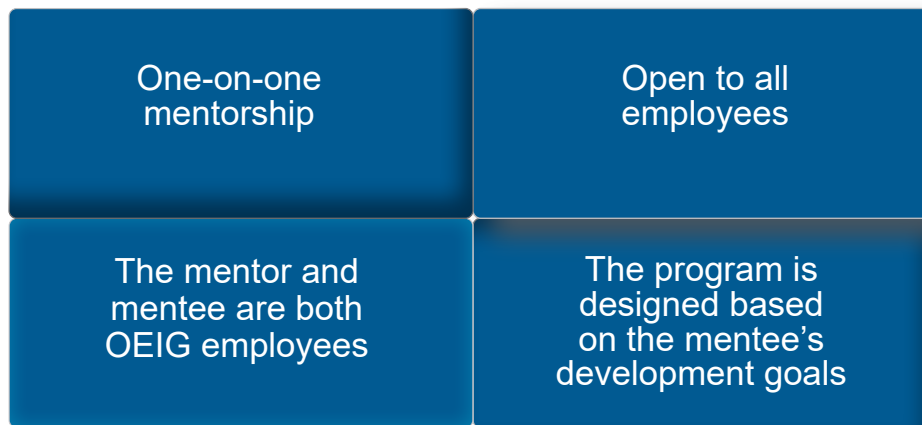
"I learned some actual steps that I can take to better keep track of my own wellness, including identifying tasks that help achieve goals, no matter how small they might seem at first."

"I thought it sent a really good message for the agency to put forward something with an emphasis on employee wellness, and would like that focus to be sustained in the future."

As discussed more below, because of the overwhelmingly positive feedback, the Working Group held a follow-up discussion to allow staff to further develop their individual wellness recovery action plans.

Also, during FY2024, the Working Group researched training opportunities for all staff and for managers with a plan to bring in the Illinois Department of Human Rights trainers in the Fall of 2024 to train staff.

## Mentorship & Development



During FY2024, the DEIA Working Group continued to maintain an internal mentorship program available to all OEIG employees. This internal, voluntary program works to provide support, guidance, development, leadership, and community for both mentees and mentors through one-on-one and group mentorship activities. The mentorship program is mentee-driven and designed to allow mentees to establish their own uniquely tailored developmental goals that can be achieved through one-on-one mentorship. The mentee and mentor are paired for a period lasting between six and nine months, depending on the goals and plan they develop.

Since the DEIA Working Group developed this program it has received overwhelmingly positive feedback. Each year mentees share how much they were able to develop and learn in the program. Mentors share how rewarding the experience was for them. Here are a few quotes from the end-of-year survey about the program:

"I have grown tremendously."

"It helped me gain more confidence."

"It was so helpful to talk to someone who understands and could provide a sounding board and offer advice."

# Employee Connection

The DEIA Working Group also continued to facilitate OEIG Connect— consisting of internal, voluntary meetings designed to discuss issues regarding marginalized groups and identities, such as race, gender, and ability. Before these discussions, the Working Group members leading the Connect meeting circulate questions and topics, articles, and/or podcasts for review. OEIG Connect was developed to create an open forum for employees to share their identities, hear from others, and be seen as their whole selves. OEIG Connect is part of the DEIA Working Group’s mission to build a community that talks openly and listens to other voices discussing topics related to diversity, equity, inclusion, and accessibility. All OEIG employees are invited to participate by listening or sharing, and come together with the goal of connecting on a personal level with colleagues.

This year we held two OEIG Connect. In October 2023, the DEIA Working Group held an OEIG Connect about microaggressions. A group of volunteers presented information and definitions about types of microaggressions, their impact, and how to respond if you commit a microaggression. The meeting included two breakout sessions, large group discussions, and an interactive activity that followed a person who experiences microaggressions inside and outside of work and how the microaggressions impact them. If you are interested in the interactive experience to illustrate microaggressions, you can visit <https://fobettarh.github.io/Killing-Me-Softly/>.

In February 2024, the Working Group hosted an OEIG Connect to facilitate an opportunity for staff to work on their individual wellness recovery action plans as a follow-up to the WRAP Workshop. During this OEIG Connect, participants were also given an opportunity to share their stressors and wellness tools.

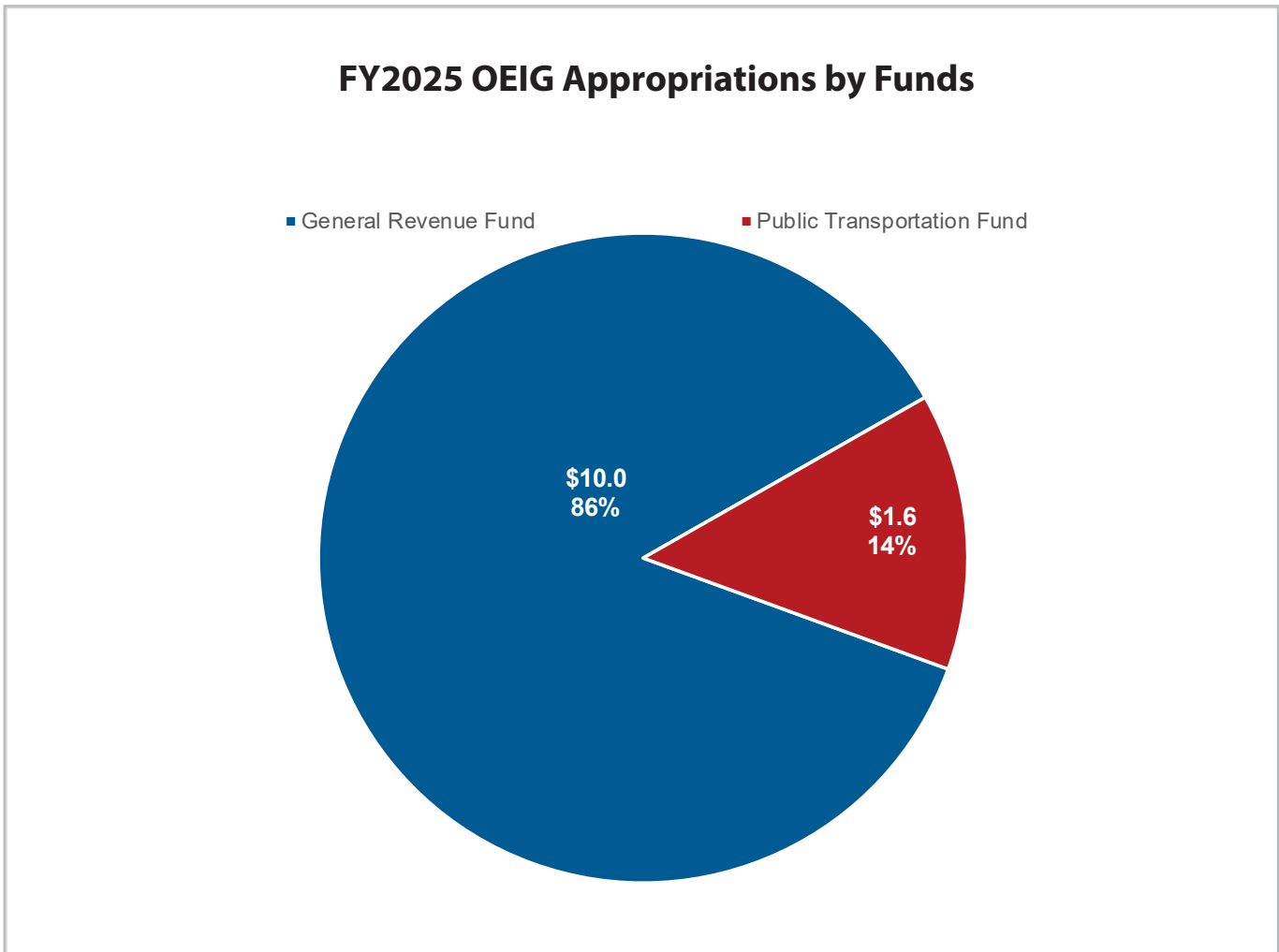
Another way the Working Group fosters connection is through a monthly email. Each month, the DEIA Working Group circulates information regarding holidays, cultural events, and important dates of recognition. The goal of this distribution is to ensure our employees are seen and heard by recognizing and celebrating the diversity that makes our office great.

In June 2024, the Springfield office held an office heritage potluck and staff brought food and shared recipes that reflected their traditions and interests.

# OEIG Finances

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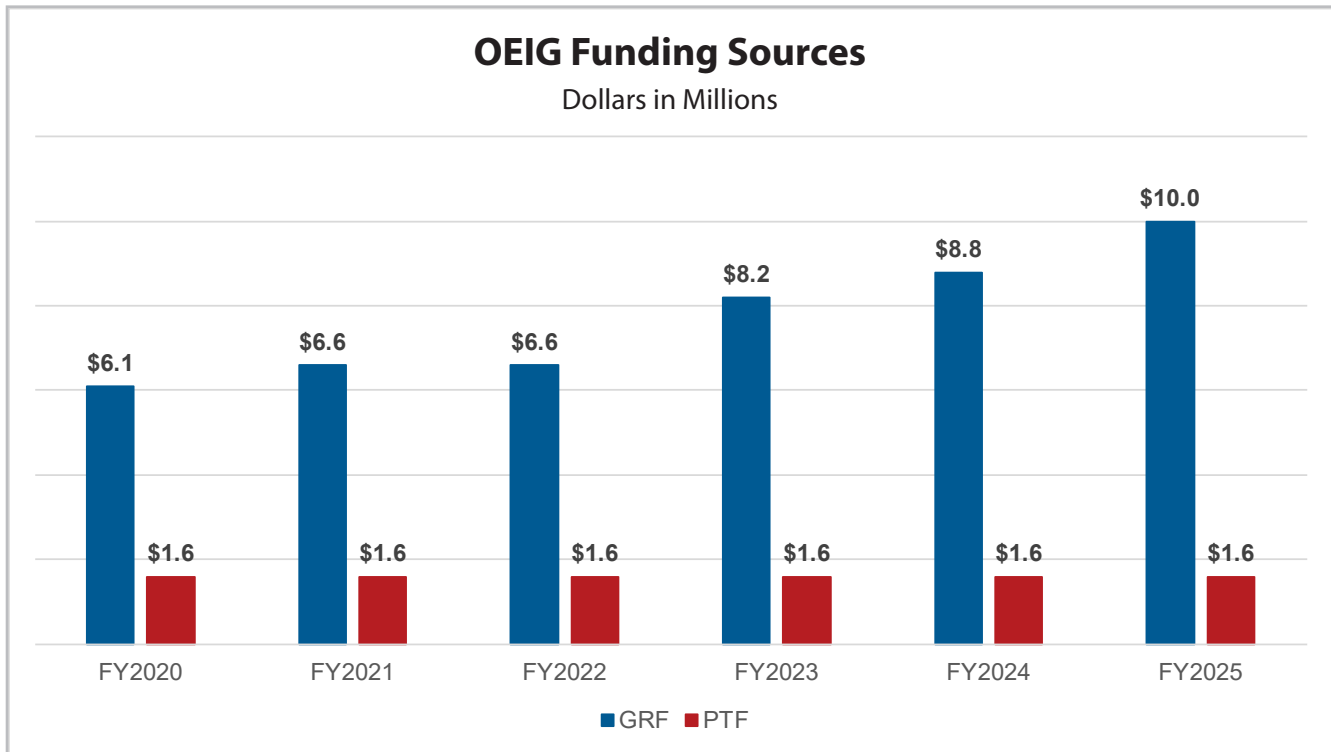
In June 2024, Public Act 103-0589, was signed into law. This law appropriated \$10,023,800 from the General Revenue Fund (GRF) and \$1,610,800 from the Public Transportation Fund (PTF) for the OEIG's FY2025 ordinary and contingent expenses.



The 14% increase in the GRF appropriation from \$8.8M in FY2024 to \$10.0M in FY2025 is necessary to strengthen the OEIG's ability to execute its mission of ensuring accountability in State government.

The PTF appropriation supports the OEIG's jurisdiction on matters involving the Regional Transportation Authority, Chicago Transit Authority, Metra, and Pace. The FY2025 \$1.6 million appropriation from the PTF has remained flat since FY2014.

# Historical GRF and PTF Appropriations



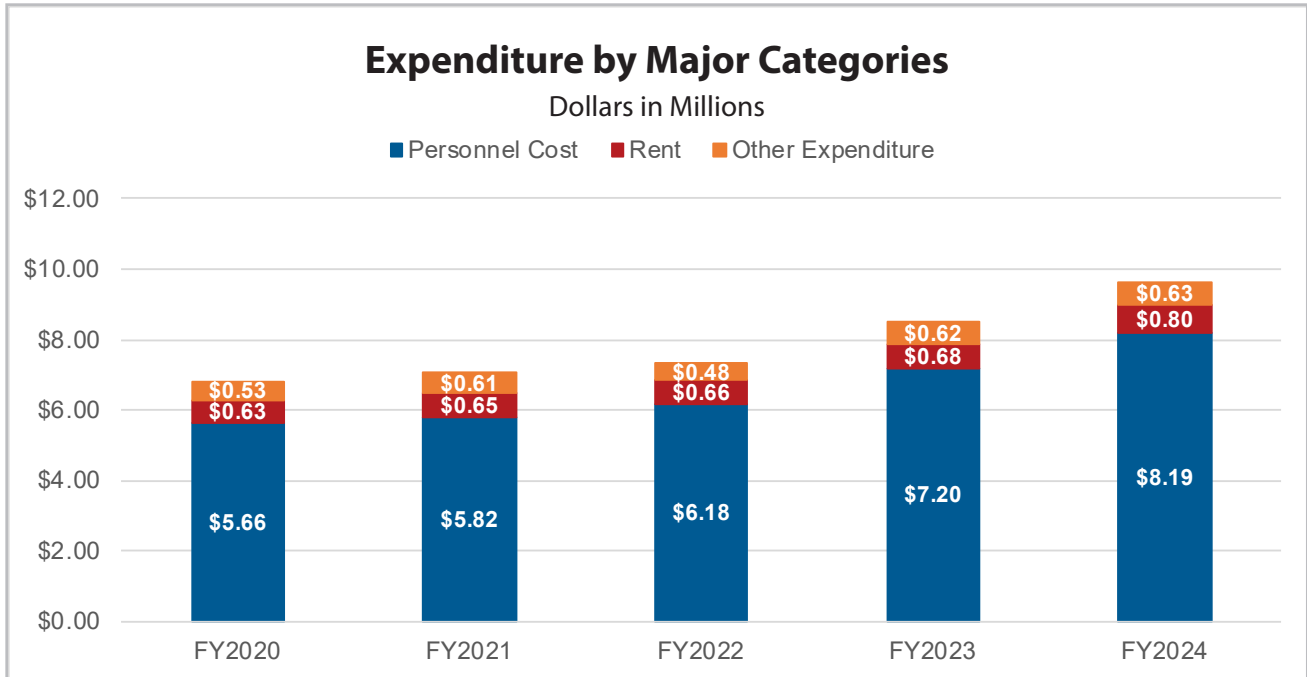
The above graph shows six years of historical GRF and PTF appropriations. Prior to FY2023, the OEIG GRF budget was historically flat, and did not reflect the increase in OEIG statutory responsibilities and the need for additional staff to perform the growing workload of the office.

This increase in GRF appropriation from \$8.2M in FY2023 to \$8.8M in FY2024 enabled the OEIG to achieve several key objectives:

- » Hired six additional staff members.
- » Provided competitive salary adjustments to retain our highly skilled team.
- » Maintained a low staff attrition of 7%.
- » Invested in staff training and development.
- » Upgraded critical IT infrastructure.

These enhancements have strengthened our capacity to fulfill our mission effectively.

# Operating Expenditures



The OEIG aims to use the State’s financial resources effectively and efficiently in compliance with applicable laws and rules. Specifically, the OEIG conforms to the State uniform accounting system and ensures that it obligates and expends public funds appropriately.

Personnel-related expenditures accounted for about 85% of the FY2024 operating expenditure. Non-salary related operating expenditure includes leased space rent which accounts for about 8% of total spend. Other operating expenditure accounts for the remaining 7% and includes DoIT support services, computer software, office furniture and equipment, contractual services, telecommunications, CMS chargebacks, travel, and other ancillary charges.

## Expenditure by Fund

Dollars in Millions

Description	General Revenue Fund (GRF)		Public Transportation Fund (PTF)	
	FY2023	FY2024	FY2023	FY2024
Personnel Costs	6,312.20	6,512.20	1,006.50	1,009.50
Leased Space Rent	586.9	686.9	98.5	99.8
DoIT Support Services	211.7	231.7	45.9	47.2
Computer Software, License and Support	106.6	112.9	20.3	22.3
Telecommunications	82.9	83.7	15.8	16.5
CMS Chargebacks	39.1	40.3	7.5	7.9
Other Expenditure	126.7	129.1	16.2	17.4
<b>Total Expenditure</b>	<b>\$7,466.10</b>	<b>\$8,453.70</b>	<b>\$1,210.70</b>	<b>\$1,169.85</b>



# Legislative Engagement

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The OEIG is committed to better State government, and therefore, regularly works with legislators and stakeholders on matters related to ethics legislation. Throughout the year, the OEIG works with other executive inspectors general, the EEC, the Attorney General’s Office, the Governor’s Office, legislators, and other stakeholders to discuss potential amendments to the Ethics Act as well as to the Illinois Administrative Code.

## OEIG-Initiated Bills

The OEIG continued to work with Representative Fred Crespo to introduce two bills with proposed amendments to the Ethics Act. Both bills clarify important aspects of the Ethics Act. House Bill 3610 was introduced on February 17, 2023. House Bill 4886 was introduced on February 7, 2024. They were both assigned to the Ethics & Elections Committee, but did not move out of Committee this session.

### House Bill 4886

In February 2024, Representative Crespo filed House Bill 4886.<sup>1</sup> This bill amends the Ethics Act to allow an Executive Inspector General (EIG) to make a public statement in limited circumstances after the EIG concludes their investigation and 1) recommends systemic or procedural action based on the investigation; or 2) finds reasonable cause to believe that a violation has occurred and the EIG does not believe a complaint should be filed by the Attorney General. The public statement will not disclose the name of any subject, but instead provide the nature of the allegations, the violations or basis for the findings, the EIG’s recommendations, and any response by the ultimate jurisdictional authority.

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<sup>1</sup> This bill is similar to HB3609 introduced in February 2023. House Bill 4886 incorporates certain clarifications based on the OEIG’s discussions with stakeholders.

The OEIG introduced this bill to allow for timely information about wrongdoing to be provided to the public. Timely dissemination will allow for better education, deterrence, proactive change, and transparency. Under the current process, after an EIG concludes its investigation and makes a finding, the full founded report is considered for publication by the Executive Ethics Commission. This is typically not done until all disciplinary proceedings are complete, which often can take up to a year or more. Thus, agencies and the public often do not receive timely information about wrongdoing.

During FY2024, the EIG and legislative staff met with several senators and representatives as well as General Assembly staff to discuss House Bill 4886. On March 20, 2024, the Ethics & Elections Committee held a subject-matter hearing on House Bill 4886 and EIG Haling testified. During the hearing, EIG Haling discussed the importance of this legislation and answered questions from the committee members. Unfortunately, the bill did not pass into law or move into the Senate during this fiscal year.

## House Bill 3610

House Bill 3610 amends the Ethics Act to allow EIGs to disclose investigatory files and reports, as necessary, to the head of the State agency affected by or involved in the investigation. This bill is important because it provides a mechanism for EIGs to disclose information directly to agency heads, for example, when there is a potential risk to public safety. Due to the confidentiality provisions of the Ethics Act, an EIG currently cannot directly disclose information to an agency head while an investigation is pending. It furthers the public interest to clarify that EIGs can disclose investigatory files and reports to agency heads.

## OEIG's Appropriations Request

As discussed in the Finance section of this report, the OEIG also proposes its own budget and drafts documents and information to explain the Office's financial needs. During FY2024, the OEIG met with legislators, legislative staff, and the Governor's Office of Management and Budget (GOMB), among others, to explain its appropriation needs. The OEIG also testified before the House and Senate appropriations committees to explain its request and answer any questions.

During FY2024, the OEIG sought a budget increase and an increase to its authorized headcount. The OEIG's headcount for investigative duties had not increased since FY2018, and during that time the OEIG saw increases to its jurisdiction and workload, with record-highs in the number of complaints and revolving door determinations. Further, as detailed above, the EIG saw a very significant increase in its investigations as a result of the self-initiated fraud investigations regarding Paycheck Protection Program loans. As a result, the OEIG sought an increase to our General Revenue Fund budget for the next fiscal year to allow a headcount increase by eight staff members.

The OEIG received its requested increase to its budget and headcount, and for FY2025 has a budget of \$10,023,800 in General Revenue Funds and \$1,610,800 in Public Transportation Funds.

## APPENDICES

58.....	<i>Executive Management Team</i>
60.....	<i>Number of Complaints Received by Agency for FY2024</i>
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# Executive Management Team

## **Susan M. Haling**, Executive Inspector General

EIG Haling was first nominated as Executive Inspector General in March 2018, and was most recently reconfirmed by the Illinois Senate on April 11, 2024. She first joined the OEIG in December 2011 as Special Counsel, and served as the First Assistant Inspector General beginning in 2015. EIG Haling has more than nine years of experience as an Assistant U.S. Attorney in Chicago, where she tried over 20 criminal trials. She also previously worked for the U.S. Justice Department, Criminal Division, in Washington, D.C. and was a law clerk for the Honorable James F. Holderman, a former U.S. District Judge for the Northern District of Illinois. EIG Haling received her BA from the University of Notre Dame and obtained her law degree from the DePaul University College of Law, where she graduated Order of the Coif, served as editor for the Law Review, and was a member of the Moot Court Trial Team.

## **Neil P. Olson**, General Counsel

Mr. Olson returned to the OEIG in May 2018 and serves as General Counsel. Mr. Olson previously worked at the OEIG as Deputy Inspector General and Chief of Springfield Division before leaving the OEIG in 2013 to serve as General Counsel in the Office of the Illinois State Treasurer. Prior to his return to the OEIG, Mr. Olson also served as an Assistant Attorney General and then the Deputy Public Access Counselor in the Office of the Illinois Attorney General. He also previously worked for the Massachusetts Attorney General's Office, the Massachusetts Commission on Judicial Conduct, as a litigator in private practice, and as the law clerk to the Honorable Kenneth Laurence of the Massachusetts Appeals Court. Mr. Olson is a graduate of Grinnell College and Northeastern University School of Law, and is licensed to practice law in Massachusetts and Illinois.

## **Fallon Opperman**, Deputy Inspector General and Chief of Chicago Investigative Division

Ms. Opperman joined the OEIG as an Assistant Inspector General in June 2008 and then served as Chief of the Regional Transit Board Division. As Deputy Inspector General and Chief of Chicago Division since February 2015, Ms. Opperman manages the investigative activities of the OEIG's Chicago office, including oversight of the Regional Transit Board Division. Ms. Opperman received a BA from North Central College and obtained her law degree from the DePaul University College of Law.

## **Erin K. Bonales**, Director of Hiring & Employment Monitoring

Ms. Bonales is responsible for directing the OEIG's Hiring & Employment Monitoring Division, which engages in compliance reviews and monitoring activities related to hiring and employment decisions, policies, and practices. Ms. Bonales previously worked for the OEIG for nearly eight years, including serving as Deputy Inspector General and Chief of the Chicago Investigative Division. Prior to joining the OEIG in May 2006, Ms. Bonales was an Assistant General Counsel for the Illinois Department of Human Services for approximately five years. Ms. Bonales received a JD from the University of Illinois College of Law, and a BA in Political Science from Southern Illinois University.

**Christine P. Benavente**, Deputy Inspector General - Executive Projects

Ms. Benavente joined the OEIG as an Assistant Inspector General in August 2011 and later served as a Legislative Assistant Inspector General. As Deputy Inspector General–Executive Projects, Ms. Benavente leads numerous executive projects, including overseeing the Division of External Compliance & Outreach, serving as the legislative attorney for all legislative matters pertaining to the OEIG, and serving as the Diversity, Equity, and Inclusion Coordinator. Prior to working at the OEIG, she was an Associate at Jenner & Block, LLP. Ms. Benavente obtained her law degree from DePaul University College of Law, where she graduated Order of the Coif and magna cum laude. During law school, she served as Editor-in-Chief of the Women’s Law Caucus Digest and Moot Court Representative for the Hispanic National Bar Association. She obtained BAs from the University of Iowa.

**Angela Luning**, Deputy Inspector General and Chief of Springfield Investigative Division

Ms. Luning joined the OEIG as an Assistant Inspector General in 2012, became a Deputy Inspector General for Investigations in 2015, and currently also serves as Acting Chief of the Springfield Division. Ms. Luning previously served as an Assistant State’s Attorney in the Will County State’s Attorney’s Office, an Assistant Attorney General, and an Assistant Corporation Counsel for the City of Chicago; she also was a law clerk to the Hon. George W. Lindberg in the U.S. District Court for the Northern District of Illinois. Ms. Luning has a BA from Yale University, and received her law degree from Loyola University Chicago, where she served as the Executive Editor for Lead Articles on the Loyola University Chicago Law Journal.

**Ogo Akpan**, Chief Fiscal Officer and Operations Manager

Ms. Akpan joined the OEIG as Chief Fiscal Officer/Chicago Operations Manager in December 2021. She provides leadership and management of all financial operations of the agency and is also responsible for administrative operations of the Chicago office. Prior to the OEIG, she worked as a Certified Public Accountant for the Illinois Office of the Comptroller. She previously held finance leadership roles in the private sector responsible for accounting, finance, and data analytics functions. Ms. Akpan received her Bachelor of Science in Accounting from the University of Nigeria, obtained her MBA from Schulich School of Business, York University Toronto Canada, and is a Certified Public Accountant in the State of Illinois.

# Number of Complaints Received by Agency for FY2024

Agency	Complaints Received
Abraham Lincoln Presidential Library and Museum	20
Aging, Department on	19
Agriculture, Department of	14
Attorney General, Office of	13
Attorney Registration & Disciplinary Commission	3
Capital Development Board	2
Central Management Services, Department of	44
Chicago Public Schools Inspector General	1
Chicago State University	12
Chicago Transit Authority	127
Children & Family Services Inspector General	1
Children & Family Services, Department of	134
City of Chicago Inspector General	21
Commerce and Economic Opportunity, Department of	8
Commerce Commission	6
Community College Board	2
Comptroller, Office of	1
Cook County Clerk of Circuit Court Inspector General	1
Cook County Inspector General	3
Corrections, Department of	421
Court of Claims	1
Court Officials	2
Criminal Justice Information Authority	8
Eastern Illinois University	2
Elgin Community College	1
Emergency Management Agency	11
Employment Security	55
Environmental Protection Agency	30
Executive Ethics Commission	1
Federal Bureau of Investigation	1
Financial and Professional Regulation, Department of	57
Governor's Office	11
Governor's State University	2
Guardianship and Advocacy Commission	5
Healthcare and Family Services, Department of	46
Housing Development Authority	14
Human Rights, Department of	22
Human Services Inspector General	15
Human Services, Department of	664
Illinois State University	3
Innovation and Technology, Department of	24
Insurance, Department of	17
Juvenile Justice, Department of	24
Labor Relations Board	1
Labor, Department of	17
Law Enforcement Training and Standards Board	4
Legislative Inspector General	1

Agency	Complaints Received
Liquor Control Commission	4
Local Police Department / Sheriff's Office	9
Lottery, Department of the	5
Math And Science Academy	4
Metra	50
Metropolitan Pier and Exposition Authority	1
Military Affairs, Department of	3
Natural Resources, Department of	24
Non State Agency	219
None Given	25
Northeastern Illinois University	12
Northern Illinois University	2
Oakton Community College	1
Office of Executive Inspector General	3
Office of the State Fire Marshal	8
Other	172
Pace	32
Pollution Control Board	1
Prisoner Review Board	4
Public Health, Department of	43
Regional Transportation Authority	4
Revenue, Department of	25
Secretary of State	29
Secretary of State Inspector General	1
Senate	1
Social Security Administration Inspector General	4
Southern Illinois University - Edwardsville	4
Southern Illinois University - Carbondale	6
Southern Illinois University - School Of Medicine	9
State Board of Education	11
State Board of Elections	5
State Employees Retirement System	2
State Police	43
State Treasurer	1
State's Attorney	7
Student Assistance Commission	4
Teachers Retirement System	3
Toll Highway Authority	9
Toll Highway Authority Inspector General	1
Transportation, Department of	203
United States Postal Service Inspector General	4
Universities Retirement System	6
University of Illinois	20
Unknown	8
Vendor	45
Veterans' Affairs, Department of	59
Western Illinois University	5
Workers' Compensation Commission	2
<b>Total</b>	<b>3,035</b>

# Allegations Received By Type Of Misconduct in FY2024

Type of Misconduct	Allegations Received
Abuse	58
Breach of Confidentiality	6
Bribery	6
Child Support	2
Conflict of Interest	20
Customer Service	94
Discrimination	277
Document Falsification	29
Extortion	1
Failure to Cooperate	3
Failure to File SEI	3
Failure to Follow Department Policy	22
False Employment Application	4
Fraud	344
Gift Ban Violation	13
Grant Fraud	2
Harassment	238
Hiring/Promotional Improprieties	180
Misappropriation/Misuse of Funds	23
Misconduct	1360
Mismanagement	233
Misuse of Property	9
None	4
Other	104
Prisoner Complaint	143
Procurement Improprieties	8
Prohibited Political Activity	6
Retaliation	175
Revolving Door Violation	7
Sexual Harassment	246
Theft	20
Time Abuse	132
Unethical Behavior/Practices	41
Violence in the Workplace	26
Wrongful Termination	35
<b>Total</b>	<b>3874</b>



## Founded Reports Issued in FY2024

Agency	Founded Reports Issued
Aging, Department on	1
Agriculture, Department of	1
Capital Development Board	1
Chicago Transit Authority	7
Children & Family Services, Department of	7
Corrections, Department of	34
Environmental Protection Agency	1
Executive Ethics Commission	1
Financial and Professional Regulation, Department of	1
Healthcare and Family Services, Department of	2
Human Services, Department of	90
Juvenile Justice, Department of	5
Labor, Department of	1
Metra	7
Pace	13
Public Health, Department of	1
State Police	4
Toll Highway Authority	1
Transportation, Department of	8
<b>Total</b>	<b>186</b>

## Online References

- » State Officials and Employees Ethics Act (5 ILCS 430)  
<http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ChapterID=2&ActID=2529>
- » Founded OEIG Investigative Reports  
<https://oeig.illinois.gov/investigations/published-oeig-cases.html>
- » OEIG File a Complaint  
<https://oeig.illinois.gov/complaints/file-a-complaint.html>
- » OEIG Hiring and Employment Monitoring Quarterly/Annual Reports  
<https://oeig.illinois.gov/hem/hem-reports.html>

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<https://oeig.illinois.gov/publications/annual-reports.html>



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*Enhancing Integrity in State Government*



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