



Office of the Chief Judge  
Director of Compliance  
Quarterly Report  
January 2, 2025-March 31, 2025

Cook County Juvenile Temporary Detention Center  
Iris Rivera  
Director of Compliance  
2245. W. Ogden Ave., Chicago, IL 60612  
[iris.rivera@cookcountyil.gov](mailto:iris.rivera@cookcountyil.gov)

Iris Rivera, Director of Compliance (DOC) for the Cook County Juvenile Temporary Detention Center (CCJTDC), respectfully submits this quarterly report pursuant to Section V(B) of the [Employment Plan](#). As required by this section of the Employment Plan, this quarterly report will also be posted and made publicly available on the Cook County Court [website](#).

## I. Introduction

This is the eighth quarterly report issued by the current DOC. During this reporting period, the Human Resources department has been undergoing a transitional phase marked by the implementation of a new electronic application system<sup>1</sup>. Concurrently, efforts are being made to align the current recruiting processes more closely with the objectives outlined in the employment plan. Throughout the month of January, I dedicated time to completing online training modules and live training sessions to gain a comprehensive understanding of the department's new recruitment tool. This effort was aimed at enhancing my familiarity with the system and its functionality, ensuring I am well-equipped to monitor and review recruitment efforts effectively.

## II. Quarterly Reports

It is the responsibility of the DOC to prepare and submit quarterly reports within 30 days following the conclusion of each quarter to the Office of the Chief Judge and the Superintendent. These reports must provide a summary of activities undertaken during the preceding quarter, including audit initiatives, identified violations of the employment plan or policies outlined in the employee handbook, allegations of unlawful political considerations and the outcomes of related investigations, remedial issues, and corrective measures implemented by the Cook County Juvenile Temporary Detention Center (CCJTDC) to address technical violations.

## III. Merit-Based Compliance Frameworks and Organizational Transparency

In prior quarterly reports, I provided recommendations to the Cook County Juvenile Temporary Detention Center (CCJTDC) aimed at advancing compliance objectives in the areas of screening, validation, candidate selection, DOC notifications, and accessibility to necessary documentation for reviewing and auditing. Moreover, the reports highlighted technical violations within past

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<sup>1</sup> JazzHR is a recruitment software utilized by CCJTDC human resource professionals to create standardized workflows for evaluating applicants/candidates.

hiring practices, which failed to align with the guidelines outlined in the employment plan. Measures have been taken by CCJTDC to streamline their hiring process and incorporate reporting features that assist in refining workflows<sup>2</sup> within the hiring sequence. The department has also implemented the use of electronic posting files to enhance transparency and facilitate improved information sharing between the Director of Compliance and OCJ Human Resource Administrators. As of the preparation of this report an attestation report documenting the completion of interviewer training sessions for selected panel members was submitted to the office of the DOC.<sup>3</sup> No interview panel member may sit on a panel without completion of the annual training requirement.

#### IV. Role of the DOC

##### 1. Training

Pre-recorded trainings on the employment plan remain accessible on PolicyTech.<sup>4</sup> Furthermore, an attestation report has been submitted to the DOC, verifying that approximately 90% of the workforce has successfully viewed the Employment Plan-related trainings. These include [interviewer training](#), [employee employment plan training](#), [supervisor training](#), and essential [human resource training](#). These training sessions are mandated on an annual basis and must be completed in conjunction with written updates reflecting any amendments to the Employment Plan. Additionally, written notice of any amendments must be provided to all employees, ensuring they are informed of any changes. A reasonable period of time will be allowed for employees to raise any questions regarding the amendments before their implementation and enforcement. The Human Resources Department is also responsible for the creation and ongoing maintenance of an Employee Handbook<sup>5</sup>. This handbook must align with and fully comply with the provisions of the Employment Plan, ensuring its effective implementation and adherence to fair employment practices. Once the handbook has been finalized, additional training will be provided to employees, allowing them to review its contents and ensure comprehensive understanding of its policies and guidelines.

##### Reviewing Job Descriptions and Notices of Job Opportunities

The CCJTDC job description(s) are a primary resource in establishing relevant selection criteria. Job descriptions are developed through a collaborative process between management and union

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<sup>2</sup> In hiring, the workflow includes creating a job posting, reviewing and validation of applications, pre-employment testing, conducting interviews, comprehensive background investigations, ranking and selecting a candidate, and sending an employment offer.

<sup>3</sup> The DOC received electronic notification of the training one day in advance and made the necessary arrangements to participate via TEAMS. The training highlighted proper interviewing conduct and techniques.

<sup>4</sup> An online tool that helps organizations manage their policies, procedures, and important documents in one place. It ensures that employees can easily access the latest versions of policies and training materials, making it simpler to stay informed and compliant with workplace rules and regulations ensuring continuous availability for staff.

<sup>5</sup> A **Shakman-related Employee Handbook** is a document that outlines employment policies and procedures in compliance with the **Shakman Decrees**, which prohibit unlawful political discrimination in government hiring within Cook County, Illinois. This handbook ensures that employment decisions—such as hiring, promotions, and disciplinary actions—are based on merit rather than political considerations.

representatives to ensure compliance with collective bargaining agreements, alignment with organizational objectives, and adherence to applicable labor standards. A compliance review constitutes an essential procedural requirement in instances where new job descriptions are introduced or material amendments are made to existing job descriptions, irrespective of the employee's classification as union or non-union, and exempt or non-exempt. A review ensures that the revised job descriptions conform to applicable OCJ policies and are harmonized with the overarching objectives and guiding principles set forth in the employment plan. No formal notice or access to updated job descriptions was provided to the DOC during the course of updates which impeded the ability to effectively review and monitor the associated employment actions. Section IV.I of the Employment Plan governs the review of job/position descriptions, mandating their accessibility to both the general public and the DOC. This provision ensures transparency in job classifications, reinforcing accountability and adherence to merit-based employment principles.

A revised job description for the Administrative Analyst I-PREA Coordinator position was anonymously<sup>6</sup> forwarded to the office of the DOC this quarter. The job description was forwarded directly to the employee, a non-union, non-exempt staff member, for their signature. Several days following the initial notification of the technical violation, the DOC was informed by another anonymous caller that additional employees had received notice of an updated job description and division transfer without proper notice to the DOC. This employment action occurred without the required implementation of No Political Consideration Certification (NPCC) signatures, as mandated. The lack of formal written or electronic notifications at least two days prior to any employment action, following the guidance of the employment plan, significantly hinders the ability to ensure proper oversight and accountability in employment-related decision-making processes.

During a review of determinations<sup>7</sup> for a Barber vacancy, it was apparent that revisions to the job description were identified as necessary by the DOC. The original description required applicants to graduate from an accredited cosmetology program and possess a cosmetology license issued in Illinois. It is essential to address any discrepancies in job descriptions before posting them and making them accessible for applicant review.<sup>8</sup> Due to the restrictive nature of the minimum qualifications, individuals holding barber licenses remain subject to the criteria outlined in the established qualifications. The DOC recommended revising the job description to include relevant

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<sup>6</sup>The employment plan specifies that a hotline will enable individuals to contact the DOC either anonymously or with attribution. A message, lacking identification, was left on the direct line to inform the DOC of employee transfers accompanied by updated job descriptions. No notice was provided of the job description updates and notice of the first quarter transfers was reported in the second quarter hindering the opportunity to review the employment action.

<sup>7</sup> A review of the application materials by the DOC to determine inclusion or exclusion of any applicant on the validated eligibility list.

<sup>8</sup>It was further recommended that the application questionnaire be aligned with the minimum qualifications outlined in the job description regarding years of experience. Specifically, while the questionnaire stipulated a requirement of at least three years of experience working with both men's and women's hair, the job description specified a minimum of five years as a minimum qualification. This discrepancy underscores the importance of ensuring consistency between the job description and application materials to prevent confusion and maintain clarity in the recruitment process.

criteria, rather than making accommodations, to ensure consistency during applicant screening processes.

A review of the Youth Development Specialist posting file and uploaded vacancy information highlighted the critical need to revise the job description. Educational qualifications for the position needed to be clearly defined to ensure consistency with established hiring practices, equity selection among applicants, and alignment with the spirit of the employment plan. Although formal guidelines exist, departmental hiring practices have often deviated, reflecting an alternative approach to recruitment and decision-making. As of this report, OCJ Administrators and CCJTDC have agreed to recommend updating the minimum education requirement to a bachelor's degree to address direct care vacancies and expand the candidate pool. This modification aligns with AOIC standards.<sup>9</sup> It was further advised that this revised criterion be applied uniformly to all applicants beginning in January of 2025, including those previously excluded due to educational requirements. These measures are intended to enhance inclusivity, mitigate subjective screening practices, and ensure fairness throughout the hiring process.

Midway through this quarter, the DOC experienced an unexplained denial of electronic access to all organizational job descriptions. This restriction significantly impedes the ability to perform a thorough and effective compliance review. As such, this constitutes a technical violation of the employment plan.<sup>10</sup>

## 2. Employee Handbook

The Employee Handbook<sup>11</sup> is a mandatory document that must be fully aligned with and implement the provisions of the CCJTDC employment plan. The handbook represents an essential instrument in advancing CCJTDC's adherence to the Shakman-related employment plan, as it promotes compliance with court-mandated regulations and reinforces adherence to anti-patronage principles. This document is critical for providing employees with clear and consistent guidelines on merit-based hiring, promotion, and decision-making processes, thereby fostering transparency and accountability in accordance with Shakman decrees. Furthermore, the handbook serves as a safeguard against unfair labor practices, ensuring the protection of both employees' rights and the organization's interests. As of the date of this quarterly report, the CCJTDC has not prepared a draft Employee Handbook for submission to the DOC for review and comment. This omission constitutes a technical violation of the Employment Plan.

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<sup>9</sup> Following the guide of the employment plan in considering whether an applicant meets a minimum qualification, disputes regarding the qualification of an applicant will be resolved in favor of meeting the minimum qualification in question, to result in the broadest applicant pool for a position.

<sup>10</sup> An initial email request for access to policies and job descriptions was denied. Subsequently, an email was sent to the DOC stating that moving forward, CCJTDC documents would be made accessible through a shared electronic posting file. However, during the remaining weeks of the quarter, the DOC encountered ongoing challenges, repeatedly having to request documents that were not uploaded to the shared posting file. Additionally, the DOC had to submit repeated requests to be included on the hiring team to participate in the review of applicant submissions.

<sup>11</sup> See IV. General Principles and Responsibilities Related to Human Resources, Subsection (b): *Employee Handbook*.

### 3. Policies and Procedures

At the end of the quarter, the DOC's request for access to the CCJTDC policies and procedures database was denied. Access to this database is a critical component in ensuring compliance with applicable laws and organizational standards. The CCJTDC policies and procedures database functions as a centralized reference tool, providing employees with clear and consistent guidelines on roles, responsibilities, and processes, available 24/7. Unrestricted access for the DOC is essential to promote transparency, support accountability, and mitigate risks, while reducing the potential for disputes or procedural misunderstandings. No explanation or justification for the restriction was provided. This omission constitutes a technical violation of the Employment Plan.

### 4. Meetings

On February 7, 2025 there was one validation meeting held in person at the CCJTDC for the vacancies of Recreation Specialist, Youth Development Specialist, and Rapid Response Team. On February 10, 2025, an in person strategic meeting concerning the employment plan was convened at the Cook County Juvenile Temporary Detention Center (CCJTDC). On March 21, 2025, a ranking meeting for evaluated candidates was monitored via the Teams platform for the position of Youth Development Specialist. On March 26, 2025 there was an in-person validation meeting held at the CCJTDC for the vacancies of Barber, System Support Specialist, Project Director II and Video Analyst. On March 31, 2025 a ranking meeting for evaluated candidates was monitored via the Teams platform for the position of Rapid Response Team.

### 5. Monitoring Activities

#### A. General Hiring Process

During the reporting period, the DOC did not receive notification of any formal employment offers. However, recruitment activities were undertaken for the purpose of filling seven positions, with seven hiring sequences initiated accordingly.

- Youth Development Specialist
- Recreation Specialist
- Rapid Response Team
- Project Director II
- Barber
- System Support Specialist
- Video Analyst

The general hiring procedure entails the assessment of the hiring request, evaluation of existing position descriptions, review of the job posting, approval of proposed interview questions, verification of applications and résumés, administration of pre-employment testing when applicable, and the completion of comprehensive background inquiries. Furthermore, it was

advised to adopt a randomization<sup>12</sup> process for external applicants who meet the minimum qualifications, especially in cases where the applicant pool is substantial, and the available positions are few. One proposed method for implementing randomization was provided through a referenced link. This approach facilitates a fair and unbiased selection process while adhering to established guidelines. During this quarter, the Cook County Juvenile Temporary Detention Center (CCJTDC) conveyed their intention to independently explore and analyze various methods for implementing a randomization process.

## B. Auditing

According to the guidelines outlined in the employment plan, all applicants whose submitted materials demonstrate that they meet at least the minimum qualifications<sup>13</sup> for a vacancy will be included on a validated eligibility list<sup>14</sup>.

- Youth Development Specialist:

There were two separate hiring sequences for the position of Youth Development Specialist this quarter. The DOC audited the recruiter-assigned validation<sup>15</sup> process for applicant submissions in January and February. An audit has revealed inconsistencies in the applicant screening and dispositioning process. Specifically, while certain applicants were evaluated based on relevant work experience despite lacking a degree in an applicable social service or human service field, other similarly situated candidates were excluded from further consideration. Additionally, applicants from prior job postings in 2024 were selected to proceed in a 2025 hiring sequence, raising concerns regarding procedural fairness.

Further, a request was made for transparency of pre-employment testing results to assess the reasons behind delays in the hiring sequence for some applicants as opposed to others. The decision to utilize a validated eligibility list without prior notification to the DOC constitutes a technical violation. Accordingly, it has been recommended that if applicants who do not meet the requisite educational criteria are permitted to undergo pre-employment testing, the same opportunity should be afforded to all similarly qualified candidates to ensure procedural consistency and fairness. As of the date of this report, the DOC had not been informed of any formal employment offers. However, my office was electronically made aware of a new employee orientation cohort scheduled to commence in April 2025. In accordance with the provisions outlined in the employment plan, a comprehensive documentation review must be

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<sup>12</sup> Randomization of applicants refers to the process of using unbiased and systematic methods to assign applicants to different outcomes or selections, often to ensure fairness and eliminate potential biases in decision-making. This approach is particularly useful when the number of applicants surpasses the available positions.

<sup>13</sup> If the provided information does not substantiate an applicant's claim of meeting the minimum qualifications for the position, the applicant will be deemed ineligible. Consequently, their name will not be included on the validated eligibility list, and the reason for ineligibility will be recorded on the applicant list.

<sup>14</sup> A list of applicants eligible for further consideration in the hiring process.

<sup>15</sup> The process of ensuring that a candidate's qualifications, experience, and other required criteria accurately meet the standards set for the position.

conducted prior to extending any offers of employment. Furthermore, all employment offers must be issued in writing, with copies retained and included in the posting file. It is important to note that certain individuals, despite appearing ineligible to advance through the hiring sequence, were nonetheless granted the opportunity to participate in pre-employment testing and interviews. In accordance with the provisions set forth in the employment plan guide, all disputes and their corresponding resolutions must be documented in writing and retained within the posting file. Notably, deficiencies in documentation and inconsistencies related to this posting persist.

- Recreation Specialist

The DOC audited the recruiter-assigned validation<sup>16</sup> process for 27 applicant submissions during which all were screened, and 7 were deemed eligible for placement on the validated eligibility list. A significant portion of applicants did not meet the minimum qualifications, while seven met either minimum or preferred qualifications. None of the seven candidates successfully advanced, as they either did not respond to the pre-employment testing<sup>17</sup> invitation or failed to meet the required testing criteria<sup>18</sup>. In line with the employment plan guide this position must be reposted.

- Rapid Response Team

The DOC audited the recruiter-assigned validation process for 56 applicants, during which all 56 were screened, and 15 were deemed eligible for placement on the validated eligibility list. To address disputed cases, the Human Resources Director and DOC scheduled a validation meeting on February 7, 2025 in an effort to reach an agreement. All 15 candidates were invited to participate in pre-employment testing, including physical ability tests, and the results were audited and documented in the posting file.

Two candidates successfully advanced after passing the pre-employment testing. One ranking meeting was attended on March 31, 2025 for this hiring sequence via the TEAMS platform. Identified discrepancies on the scored interview list were promptly corrected by recruiters during the ranking meeting, as highlighted by the DOC. To ensure accuracy and compliance, the DOC must have the opportunity to review and verify the tabulated scores prior to the commencement of the ranking meeting.<sup>19</sup> The audit of this posting file highlighted the necessity

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<sup>16</sup> The process of ensuring that a candidate's qualifications, experience, and other required criteria accurately meet the standards set for the position.

<sup>17</sup> The test includes components such as human relations video assessments, reading tests, and dimensional scoring, which analyze traits like emotional self-control, professional boundaries, teamwork, and communication style.

<sup>18</sup> Testing protocols were uploaded in the posting file. On April 16, 2025 during an OCJ HR and CCJTDC administrator meeting a request was made to provide all testing results for all positions requiring pre-employment testing in the electronic posting files. At the time of this request, the hiring sequence for the vacancy had concluded.

<sup>19</sup> See scored interview list on page 30 of the employment plan.

of providing training for interviewer panelists<sup>20</sup>, underscoring the importance of focusing evaluations on objective and measurable criteria directly related to the role's requirements. Employment offers<sup>21</sup> were not reported to the DOC for this hiring sequence.

- Project Director II

The DOC audited the recruiter-assigned validation process for 50 applicants, during which all 50 were screened, and 20 were deemed eligible for placement on the validated eligibility list. To address disputed cases, the Human Resources Director and DOC scheduled a validation meeting<sup>22</sup> on March 26, 2026 in an effort to reach an agreement. A written explanation of the disagreement and how the disagreement was resolved will be included in the posting file and additional information on this hiring sequence will be reported in the next quarterly report.

- Barber

The DOC audited the recruiter-assigned validation process for 25 applicants, during which all 25 were screened, and 12 were deemed eligible for placement on the validated eligibility list.<sup>23</sup> A few discrepancies in credential validation were identified and subsequently resolved. To address disputed cases, the Human Resources Director and DOC scheduled a validation meeting on March 26, 2025, to seek resolution on contested applicants. Due to a required update to the job description<sup>24</sup>, the Human Resources Director and DOC will reconvene. As a result of the specific language in the job description, only two applicants were determined eligible by the DOC.

- System Support Analyst

The DOC audited the recruiter-assigned validation process for 47 applicants, during which all 47 were screened, and 21 were deemed eligible for placement on the validated eligibility list. The validation meeting occurred on March 26, 2025. Progression through the hiring sequence will be documented in the next quarterly report.

- Video Analyst

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<sup>20</sup> As of the preparation of this report, the DOC received one day's advance notice regarding scheduled continuous training sessions for interview panel members. However, no training materials were submitted for review, and the agenda did not include any discussion on potential conflicts of interest. Additionally, the DOC attended one training session on April 8, 2025, which will be documented in the next quarterly report. Furthermore, the DOC requested a list of attendees who serve on the panel, but no such list was forwarded by Human Resources.

<sup>21</sup> The Human Resources Director or Designee will notify the Superintendent, the Department Head and the DOC of the disposition of the employment offer.

<sup>22</sup> Validation meeting held on April 16, 2025.

<sup>23</sup> Barber and cosmetology licenses were placed in the posting file and verified through <https://idfpr.illinois.gov/checklicense.html>.

<sup>24</sup> Variability in screening procedures may create perceptions of inequity, whereas clear and well-defined job descriptions ensure a fair and consistent evaluation process for all applicants.

The DOC audited the recruiter-assigned validation process for 67 applicants, during which all 67 were screened, and 31 were deemed eligible for placement on the validated eligibility list. A validation meeting occurred on March 26, 2025.<sup>25</sup> Progression through the hiring sequence will be documented in the next quarterly report.

### C. Electronic Posting Files:

The electronic posting files for the aforementioned vacancies were audited. Certain challenges were identified, including instances where incorrect job descriptions were uploaded and the absence of written documentation from validation meetings, accompanied by signed NPCC forms, which must be included. Additionally, the grant of authority documents, employment offers and unaccepted offers must be a part of the posting files. It was also recommended that pre-employment testing results be incorporated in posting files with the testing protocols. The CCJTDC General Counsel will conduct further research on test results and will provide follow-up guidance accordingly.

## V. Requirements of the Quarterly Report

Quarterly reports issued by the DOC within 30 days after the close of each quarter will be provided to the Office of the Chief Judge and the Superintendent of CCJTDC. These reports will detail activities from the prior quarter, including, but not limited to auditing activities required by the employment plan; (ii) discovered violations of the employment plan or policies in the employee handbook referenced in the employment plan; (iii) complaints of unlawful political considerations in employment actions, findings from investigations, and any related outcomes; (iv) remedial actions recommended; and (v) corrective actions taken by the CCJTDC to address these violations.

### 1. Auditing activities:

This quarter, the DOC focused its auditing activities on the electronic posting files and the new applicant tracking system, JAZZ HR. Several inconsistencies were identified in the processes of screening and validating applicants. These challenges were compounded by narrow or ambiguous job descriptions and the inconsistent application of criteria when processing or advancing applicants through the hiring stages. Validation meetings were conducted during this quarter, representing a significant step forward in fostering communication between the DOC and the Human Resources Director, an essential development for improving oversight and alignment.

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<sup>25</sup> In considering whether a candidate meets a minimum qualification, a dispute regarding the qualifications was resolved in favor of meeting the minimum qualifications. Two other candidates validated did not meet the minimum qualifications and were dispositioned.

## 2. Discovered technical violations of the employment plan:

In summary, technical violations primarily stemmed from a lack of transparency and timely notifications to the DOC, hindering the ability to effectively monitor employment activities. Employment actions were often conducted without adequate notice, with notifications being issued several weeks after the actions had taken place.<sup>26</sup>

Transparency and document-sharing processes were disrupted without explanation, preventing the DOC from reviewing critical policies and job descriptions.

Furthermore, requests for essential documentation—including the ineligible hire or rehire list, internal candidate preference list, association forms, resignations and transfers, employment offers, unaccepted offers—were either not shared with proper notification or entirely withheld.

## 3. Complaints of Unlawful Political Discrimination/Violations of the Employment Plan

There were no formal complaints filed however anonymous calls regarding transfers of employees with revised job descriptions were forwarded to the office of the DOC.

## 4. Technical Violations

- a. In accordance with the employment plan, the DOC must be given a reasonable opportunity to monitor employment actions through electronic notification at least two days in advance. However, employee resignations in January, employee transfers in March without a signed NPCC, along with updates to their job descriptions were executed without proper prior notice, thereby denying the DOC the legally required opportunity for oversight and constituting a technical violation of the employment plan.
- b. Obstructing or denying access to non-privileged or privileged documents and information requested by the DOC constitutes a technical violation of the employment plan. Thereby impeding required oversight and compliance. If any privileged materials are withheld from the DOC, a privilege log identifying the withheld materials must be prepared and submitted to the DOC, ensuring compliance with legal and procedural requirements.

## 5. Remedial Action

- a. The Human Resources Department at CCJTDC has initiated a randomization process to select qualified applicants who meet the minimum qualifications when the pool of applicants significantly exceeds the available vacancies. Currently, they are in the

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<sup>26</sup> The DOC received electronic notification from the Human Resource Director of three employee transfers on April 9, 2026. The DOC was not given prior notice that their job descriptions had been revised.

preliminary stages of developing a standard operating procedure to formalize and guide the implementation of this randomization process. This effort aims to streamline and ensure fairness in the applicant selection process.

## 6. Corrective Action

- a. This quarter, in alignment with the employment plan, weekly validation meetings with the DOC have been held to ensure oversight and compliance with the candidate selection process.
- b. This quarter, the Human Resources Department, in alignment with the employment plan, has documented the reason for any applicant's ineligibility on the applicant list, ensuring transparency and compliance in the selection process.
- c. As of the writing of this report, interviewer training was officially initiated by the Director of Human Resources, training employees who are eligible to interview candidates regarding proper interviewing conduct and techniques.
- d. Human Resources personnel have completed training on a more efficient applicant tracking system.
- e. Human Resource personnel implemented electronic posting files to strengthen transparency in hiring processes.

## 7. Recommendations in Compliance with the Employment Plan Guidelines

- a. **Document disputes & resolutions** – A formal written explanation of any disputes regarding the inclusion or exclusion of applicants from the validated eligibility list, along with their resolution, must be recorded in the electronic posting file along with an NPCC, in accordance with the employment plan.
- b. **Provide notice of eligibility list decisions** – Before utilizing an existing validated eligibility list or posting a position, written notice of the decision must be provided to the DOC, ensuring compliance with the employment plan.
- c. **Record use of interview panel ranking forms** – The use of an interview panel ranking form for filling additional vacancies must be formally documented within the electronic posting file and submitted to the DOC, in alignment with employment plan requirements.
- d. **Review of posting file prior to employment offers** – Before extending an offer of employment, the full posting file will be reviewed to verify that all required documentation is included. No offer shall be made until the Human Resources Director and the DOC have received and confirmed all necessary documents.
- e. **Notification of employment decisions** – The Human Resources Department will notify the DOC regarding employment offers or their rejection, ensuring compliance with the employment plan guidelines. This information will be formally documented in the posting file for transparency and future auditing.
- f. **Candidate communication**– Any communication from a candidate whether written or verbal, must be recorded in a contact log, and documented in the posting file.

## VI. Substantial Compliance

On July 19, 2022, the Cook County Juvenile Temporary Detention Center consented to the entry of an Agreed Order by the District Court. The Agreed Order for the CCJTDC (found [here](#)) provides the framework for the CCJTDC to implement additional policies and procedures to assure that all aspects of employment are free from unlawful political discrimination. The CCJTDC has the burden of showing that it remains in Substantial Compliance with the Consent Decrees and Agreed Order. Substantial Compliance means:

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

The Employment Plan has been initiated and remains in effect for the current quarter. To ensure adherence to established procedures, the Human Resources Department must continue expanding its knowledge beyond traditional HR functions. This objective is being achieved through OCJ meetings, checklists, detailed workflow guides, ongoing retraining sessions, and other systematic measures.

Next, instances of non-compliance this quarter have been primarily technical in nature and not uncommon. Efforts such as the development of workflow guides, collaboration on standard operating procedures, and a commitment to transparency through notifications and document sharing are essential in mitigating technical violations.

Notably, no matters were referred to the office of the attorney general, nor were any formal written complaints filed. However, anonymous calls were received by the office regarding personnel decisions, including transfers, resignations, and modifications to job descriptions that were implemented without proper notice to the DOC. This suggests that CCJTDC has an established practice of making employment-related decisions without the requisite oversight.

At this time, it remains undetermined whether employment decisions are influenced by political considerations. Additionally, as outlined in this report, CCJTDC is not free from technical violations of the Employment Plan. However, the Human Resources Department’s approach—either disregarding requirements or eliminating them before appropriate monitoring and auditing mechanisms are established—undermines the fundamental objectives of the plan.

Upon attaining substantial compliance, CCJTDC will attribute its success to the dedication and perseverance of committed professionals within its Human Resources Department and OCJ administration. Their efforts must not be undermined by policies lacking the necessary safeguards to prevent unlawful political discrimination from re-emerging within the workforce.

Accordingly, it is imperative that the CCJTDC formulates policies that are precisely structured, objective in application, and resistant to circumvention due to subjective interpretation. While this approach may not represent the path of least resistance, it establishes a framework that ensures accountability—both for CCJTDC itself and for future administrations. By prioritizing integrity and adherence to legal standards, CCJTDC can uphold its commitment to fair and impartial employment practices.

Respectfully Submitted,

*Iris Rivera*

Iris Rivera  
Director of Compliance  
Cook County Juvenile Temporary Detention Center