

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MICHAEL L. SHAKMAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	Case No. 69 C 2145
v.	)	
	)	Magistrate Judge Sidney I. Schenkier
COOK COUNTY ASSESSOR'S	)	
OFFICE, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**FIFTEENTH REPORT OF THE ASSESSOR COMPLIANCE  
ADMINISTRATOR FOR THE COOK COUNTY ASSESSOR**

Susan G. Feibus, Assessor Compliance Administrator for the Cook County Assessor (“ACA”), by her attorney, Matthew D. Pryor, pursuant to Section III(C) of the September 19, 2012 Agreed Order for the Cook County Assessor’s Office (“AO”), Doc. No. 3007, submits the ACA’s Fifteenth Report to the Court:

**I. INTRODUCTION**

On October 7, 2019, the ACA filed the Amended Fourteenth Report to the Court (“Fourteenth Report”). Doc. No. 6534. This was her eighth report since her January 26, 2016 appointment (effective February 1, 2016). *See* Doc. Nos. 4751, 4856, 5059, 5204, 5725, 5894, 6369 (ACA’s Sixth –Thirteenth Reports). This Fifteenth Report is to update the Court as to the Assessor’s progress towards Substantial Compliance with the September 19, 2012 Agreed Order (“Agreed Order”) since the Fourteenth Report.

As this report is written, the State of Illinois has been under a “shelter-at-home” order for a month with no clear end in sight. The ACA understands that while the public-facing parts of AO have been curtailed, the AO continues to operate with employees working remotely. This includes

managing the AO workforce and continued hiring, which is being effectuated by conducting interviews via Zoom - functions that are subject to ACA monitoring. The ACA commends the AO for meeting the many challenges (Shakman-related and otherwise) presented by this crisis.

While the AO rightly has noted that there have been no findings of Unlawful Political Discrimination since Assessor Kaegi took office, that is not the touchstone for Substantial Compliance. To achieve Substantial Compliance, the Agreed Order requires an Employment Plan, policies and procedures to effectuate that plan and the effective enactment of these policies and procedures. These are the structural pieces designed to eliminate the environment – no matter the Assessor – where Unlawful Political Discrimination can take hold.

As the Agreed Order puts it, Substantial Compliance requires:

1. a New Employment Plan, including procedures to ensure compliance with the New Employment Plan and identify instances of non-compliance;
2. the Assessor must act in good faith to remedy instances of non-compliance that have been identified and prevent a recurrence;
3. the Assessor must not have a policy, custom or practice of making employment decisions based on political factors except for Exempt Positions;
4. the absence of material noncompliance which frustrates the Assessor's Consent Decrees<sup>1</sup> and this Agreed Order's essential purpose; and
5. the Assessor must implement procedures that will affect long-term prevention of the use of impermissible political considerations in connection with employment with the Assessor.

Doc. No. 3007 at 18.

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<sup>1</sup> The "Assessor's Consent Decrees" refer to the combination of (a) a 1972 Consent Decree which, *inter alia*, prohibited the Assessor from taking any action regarding governmental employment against any governmental employee based on political reasons or factors; and (b) a 1995 Consent Decree which incorporated the 1972 Consent Decree's prohibitions and extended those prohibitions to the Assessor's hiring practices, with certain exclusions. *See* Doc. No. 3007 at 5.

Much remains to be done. The long gestating overhaul of the Employment Plan has not been completed. The mandatory annual Shakman training that was due in February 2019, has not taken place. The Shakman-related policies in the Employee Handbook remain in a state of revision. AO implementation of those policies continues to need improvement. The Human Resources function is not operating at the level required to fulfill the AO's obligations under the Employment Plan and Employee Handbook. This is not as grim as it may sound. The AO's hiring has been largely Employment Plan compliant. And the ACA believes the AO's stated intention to continue on the path of Substantial Compliance, even during the crisis. She looks forward to a collaborative effort to achieve that goal.

Also, this is the ACA's final report prior to Judge Schenkier's retirement. She is grateful to acknowledge that the progress achieved was in no small measure due to the abundant intellect, pragmatism and patience that he brought to this matter.

## **II. OVERVIEW OF THE ACA'S ACTIONS SINCE THE OCTOBER 7, 2019 FOURTEENTH REPORT**

The ACA and her staff remain actively engaged with the AO, Plaintiffs and the DOC in the AO's efforts to achieve Substantial Compliance. In summary, the ACA's activities since the Fourteenth Report included:

- reviewed and monitored many Employment Actions;
- reviewed and monitored the Assessor's Exempt hiring;
- provided significant input into and monitoring of the Assessor's hiring under the Actively Recruited process;
- provided significant input into and monitoring of the Assessor's non-Exempt hiring;
- reviewed and monitored the Assessor's hiring under the Executive Assistant hiring process;
- met and conferred with counsel for Plaintiffs on a regular basis;

- met and conferred with AO personnel responsible for implementing the Agreed Order and counsel on a regular basis;
- provided significant revisions to the Employment Plan;
- provided significant review and comments to the AO's proposed revisions to Shakman-related employment policies;
- monitored and commented on the AO's roll out of union and non-union position descriptions;
- provided significant input into the AO's efforts at implementing Shakman-related employment policies, including regular feedback to the AO; and
- interviewed and conducted desk audits and exit interviews of AO employees.

### **III. THE ASSESSOR'S PROGRESS TOWARDS SUBSTANTIAL COMPLIANCE**

#### **A. The Employment Plan Has Not Been Revised**

Section II(D) of the Agreed Order requires the creation of an Employment Plan. To achieve Substantial Compliance, the Assessor must implement that plan. Agreed Order at III(F)(8)(1). Shortly after the December 2018 change in administration, the AO indicated a desire to negotiate a significant overhaul of the Employment Plan. Since the AO's Employment Plan had been approved by the Court in 2016, with only modest subsequent amendment, Plaintiffs and the ACA were amenable. Plaintiffs and ACA provided their initial consolidated revisions in February 2019, with additional iterations by Plaintiffs/ACA and the AO since then.

The process of revising the Employment Plan has taken far longer than expected. For the most part, the outstanding issues should be able to be resolved in short order. The one exception is the continued viability of the Executive Assistant Hiring Process, which permits an Exempt Deputy or Director to hire and retain a "direct-report clerical and secretarial assistant" outside of the General Hiring Process. Employment Plan at XI.

Under the Executive Assistant Hiring Process, an Exempt employee may choose his/her Executive Assistant who may be terminated when the Exempt employee leaves the AO. This is a legacy process designed in the day when executives (and Plaintiffs' law firm partners who were instrumental in crafting the original Employment Plans) had private secretaries with duties limited to clerical and administrative functions. Since the duties performed by executive assistants in the AO today go beyond clerical and administrative functions (as is the case with many, if not most, organizations), it is Plaintiffs' position (with which the ACA concurs) that the Executive Assistant Hiring Process should be eliminated. Rather than fill these positions under the General Hiring Process, Plaintiffs offered to allow the AO to fill these positions under the Actively Recruited Hiring Process, with its greater flexibility in selecting Candidates for interview. The AO demurred.

At this juncture, the parties are at impasse about the Executive Assistant Hiring Process. Given the length and extent of the revision process, the ACA expects Plaintiffs may move for the entry of an amended Employment Plan, with resolution of the Executive Assistant Hiring Process reserved for a subsequent motion and resolution by the Court.

**B. Annual Mandatory Training on the Employment Plan Has Not Been Conducted**

Section IV(G) of the Employment Plan requires HR, in conjunction with the DOC, to conduct "comprehensive, mandatory training of all Employees to ensure that they are aware of and knowledgeable about [the] Employment Plan, the Employee Handbook, and Unlawful Political Discrimination." Section IV(G) further requires this training to occur no later than 60 days after an employee is hired and "no less infrequently than annually thereafter."

The AO last conducted training under the Employment Plan in February 2019. Under Section IV(G) the mandatory annual training should have occurred by February 2020. That did

not happen.<sup>2</sup> HR and the DOC have acknowledged their failure to comply with Section IV(G). The DOC has indicated that he is working on changes to the training to make it more thorough and interactive. Presumably, HR and the DOC will finalize any changes and conduct this training as soon as possible under the current circumstances.

### **C. Assessment of the Assessor's Hiring Practices**

A significant component of the Employment Plan relates to its five separate hiring processes: (1) Exempt; (2) "Actively Recruited"; (3) non-Exempt; (4) DOC; and (5) Executive Assistant. One element of implementing the Employment Plan, as required for Substantial Compliance, is hiring in compliance with these schemes. Since the Fourteenth Report, the AO has hired employees under each of these processes, with the exception of the DOC who was hired prior to the Fourteenth Report.

#### **1. Exempt Hiring**

Per the amended Exempt List entered by the Court on December 6, 2019, the AO has 27 Exempt positions. Since the Fourteenth Report, two Exempt positions were added:

- Director of Special Projects – Valuation: Position filled; January 6, 2020 date of hire
- Director of Data Integrity – No Candidate proposed

Also, the Assessor replaced five Exempt employees since the Fourteenth Report:

- Deputy Assessor, Chief Policy Officer: October 7, 2019 date of hire
- Sr. Data Scientist – Residential: December 2, 2019 date of hire
- Director of Policy: January 6, 2020 date of hire
- Chief Administrative Officer: February 24, 2020 date of hire

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<sup>2</sup> Since HR, in conjunction with the DOC, conducted training on the Employee Handbook in September 2019, that training is not overdue.

- Director of Commercial Valuations: date of hire to be determined

These hires were conducted in accordance with the Employment Plan.

## 2. “Actively Recruited” Hiring

The AO filled five positions through the “Actively Recruited” hiring process since the Fourteenth Report:

- Manager of Residential Valuations (two positions): October 7, 2019 and October 21, 2019 dates of hire
- Manager of Commercial Valuations: November 4, 2019 date of hire
- Manager of Special Properties: January 6, 2020 date of hire
- Manager of Commercial Valuations: April 13, 2020 date of hire

While there were technical issues with the interview and scoring processes, they did not affect the overall validity of the hiring. Two issues are noted. First, the Fourteenth Report expressed concerns about a Deputy Assessor’s commitment to Shakman compliance. These concerns continue based on his conduct during the interview/ranking processes for the Manager of Special Properties, including the Deputy Assessor’s refusal to explain his scoring as required by the Employment Plan. Second, HR appointed and the DOC allowed two employees who had not been certified in interviewer training to the Interview Panel in violation of Section IV(H) of the Employment Plan. It was remedied before the employees participated in additional interviews.

## 3. General Hiring Process: Non-Exempt Hiring

The AO filled five positions through the General Hiring process since the Fourteenth Report:

- Manager of Payroll: November 12, 2019 date of hire
- HR Senior Generalist: December 23, 2019 date of hire
- Exempt Analyst (two positions): January 21, 2020 dates of hire
- Division Analyst: February 2, 2020 date of hire

The Senior HR Generalist position was filled using the Validated Eligibility List created for the August 2019 Senior HR Generalist hiring. The hiring for the other positions generally was Employment Plan compliant. There were technical errors in the interview and scoring process, but they did not affect the overall validity of the hiring.

Of note is that HR required a pre-interview Excel test for the Manager of Payroll and a math problem as part of the interview process for the Division Analyst. In each instance, there were issues. For the Manager of Payroll position, HR made multiple errors in the scoring process, which were identified by the ACA and DOC. For the Exempt Analyst, two of the four Interview Panel members scored the question incorrectly and HR's Scored Interview List and Interview Score Tabulation Worksheet were inaccurate. While the Employment Plan allows pre-employment testing, HR should take care that it be carried out correctly.

Currently, the General Hiring Process is underway for six additional positions: (1) Assistant Manager of Residential Field; (2) Assistant Manager of Commercial Field; (3) Paralegal; and (4) Taxpayer Information Specialist (three positions). The ACA will comment on those hiring processes in a future report.

#### **4. Executive Assistant Hiring**

The AO hired one Executive Assistant since the Fourteenth Report. Her date of hire was March 30, 2020. This hire was to replace the Executive Assistant to the prior Chief Administrative Officer and was in compliance with the current version of the Employment Plan.

#### **D. Assessment of AO's "Shakman-Related" Policies/Procedures**

An essential element of implementing the Employment Plan, as required for Substantial Compliance, is AO employment policies and procedures to ensure compliance with the



Employment Plan and identify instances of non-compliance (“Shakman-related policies”). Agreed Order at II(D), III(F)(8)(1).

The Employment Plan requires Shakman-related policies to be included in the AO’s Employee Handbook,<sup>3</sup> which is to be revised and maintained by HR and distributed to all employees. Section IV.B. An Employee Handbook was in effect in December 2018, when Assessor Kaegi took office. The AO wished to review and revise the existing policies and negotiated revisions with Plaintiffs and the ACA.

A revised Employee Handbook was promulgated in September 2019. Virtually since that time, the parties and the ACA have engaged in further negotiation about Shakman-related policies. At this point, the remaining issues are modest, with the Discipline and Time and Attendance policies requiring the greatest attention.

**E. Assessment of AO’s Implementation of Shakman-related Policy Implementation**

While promulgating Shakman-related policies is a necessary step towards Substantial Compliance, it is not sufficient. Substantial Compliance also requires the AO to effectively implement these policies. Agreed Order at III(F)(8)(1).

The ACA monitors all AO actions regarding Shakman-related policies and continues to give the AO regular written feedback about noncompliance. The major Shakman-related policy implementation issues that the ACA has observed since the Fourteenth Report are described below. Based on these observations, the AO’s implementation of Shakman-related policies is not yet at the level required to achieve Substantial Compliance.

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<sup>3</sup> The AO’s Employee Handbook includes the Shakman-related policies and other personnel policies that are not required by the Employment Plan. The AO’s Shakman-related policies are Reclassification; Performance Evaluation; Overtime; Layoff and Recall; Interim Assignment; Temporary Assignment; Training; Performance Improvement Plan; Time and Attendance; and Discipline.

While HR ultimately is responsible for effective implementation of Shakman-related policies, AO supervisors also have responsibilities which are detailed in the Employee Handbook. The ACA's review of Shakman-related policy implementation described below indicates that supervisors are not well-versed in their duties and responsibilities. While supervisors received training on Shakman-related policies in September 2019, it was part of larger training on the Employee Handbook and there was much information to absorb, much of it new. Shakman-related policy implementation presumably could be enhanced through additional supervisor training.

### **1. The Performance Evaluation Policy/Process**

The AO cannot achieve Substantial Compliance unless and until it demonstrates a workable performance evaluation process. This is new ground for the AO as performance evaluations have not been conducted since at least 2010 when Assessor Berrios took office.

The first necessary step towards a performance evaluation process is current and accurate position descriptions as required by Section IV.J of the Employment Plan. On taking office, Assessor Kaegi received revised union and non-union non-Exempt position descriptions, with a few identified legacy issues, which resulted from a year of hard work by the parties and the ACA.<sup>4</sup> The Berrios administration did not roll out these position descriptions since completion was on the eve of the Kaegi administration.

The AO wished to review the union and non-union non-Exempt position descriptions. The process took longer than expected. The non-union position descriptions were finally revised in July 2019; the rollout was completed in December 2019. The union position descriptions were

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<sup>4</sup> This work included, but was not limited to, line-by-line review of every non-Exempt position (union and non-union) position description based on over 150 desk audits of AO employees the AO, its outside counsel and the ACA.

finalized in or about January 2020, as the AO addressed FLSA-Exempt and pay equity issues; roll-out was completed in March 2020.

Based on operational needs, the AO has projected September 2020, as the earliest possible date for initiating the performance evaluation process for one department. The remaining performance evaluations are projected to occur in December 2020 and January 2021.

The AO is implementing part of its Performance Evaluation Policy by conducting 90-day and 180-day performance evaluations of new employees. While these performance evaluations cannot substitute for the requisite full performance evaluation process, they provide insight into the AO/HR's ability to manage the process.

There have been eight 90-day performance evaluations since the revised Employee Handbook was completed. Each was monitored by the ACA. This monitoring revealed many policy deficiencies by the responsible supervisors including: incomplete performance evaluation forms; inadequate oral feedback including failure to review position description and job expectations and/or give examples of the employee's positive/negative performance; inadequate written feedback including failure to provide examples of the highest and lowest scores; failure to accurately calculate the employee's overall score and failure to conduct the 90-day evaluation on a timely basis.

Of particular concern is a recent performance evaluation of a manager in the Valuations Department. The policy requires that employees be reviewed by their direct supervisors. In contravention of the policy, the same Deputy Assessor whose conduct regarding the Manager of Special Properties hiring was criticized in the Fourteenth Report and above, took it upon himself to fill out the Performance Evaluation Form and conduct the performance evaluation meeting – even though he is not the manager's direct supervisor (he is another level above). HR, presumably

aware of what the policy requires, did not stop the Deputy Assessor. The Deputy Assessor's improprieties continued at the performance evaluation meeting where HR also realized that the Deputy Assessor had not fully filled out the Performance Evaluation Form. When HR appropriately decided to reschedule the performance evaluation meeting so the Performance Evaluation Form could be completed correctly, the Deputy Assessor claimed that he did the form "thoroughly" even "if it doesn't fit the Handbook."

As noted above and in the Fourteenth Report, this Deputy Assessor repeatedly has balked at abiding by the Employment Plan and Shakman-related policies. Given his high-ranking role and, keeping in mind the Court's oft-repeated guidance that Shakman compliance comes from the top, the Assessor would be well served to take whatever measures are required to ensure that the Deputy Assessor observes the parameters of Shakman compliance.

## **2. Time and Attendance Policy**

The ACA's review and analysis of entries by the AO on Cook County Time ("CCT"), the timekeeping system used by Cook County offices, and other documentation from the AO, shows a wholesale failure by the AO to enforce its Time and Attendance policy since December 2018, when Assessor Kaegi took office, until December 2019, when a few enforcement efforts were taken, with modest enforcement efforts until the recent shut down.<sup>5</sup> Part of the enforcement problem is supervisors' failure to provide required documentation. Ultimately, the responsibility is HR's, which is tasked to properly implement and enforce all Shakman-related policies.

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<sup>5</sup> Based on an audit dated February 20, 2020, and recounted in his Semi-Annual Report for the period September 16, 2019 through March 15, 2019, the DOC found potential abuse of the use of Sick Time by AO employees to extend weekends and vacations and maximize paid time off leading up to retirement. The Assessor has not provided a substantive response to the DOC's audit findings and recommendations.

a. AO Failure to Enforce Attendance “Points” Discipline

As discussed in the Thirteenth and Fourteenth Reports, in a February 4, 2019 memo entitled “Guidance on Dress Code, Time and Attendance, and Overtime Policy,” the AO unilaterally “suspended” the AO’s longstanding “points” discipline policy. Plaintiffs and the ACA subsequently agreed that the AO could replace its “points” discipline policy with the following standard, set forth in Section 2(6)(C) of the Time and Attendance Policy: “[F]our or more unexcused late arrivals and/or unexcused early departures within a one-month period shall result in disciplinary action.”

Plaintiffs and the ACA agreed to the new attendance standard because the AO said it would be enforced. Section 5.1 of the Time and Attendance Policy requires HR to review all employees’ attendance on a monthly basis. But Section 5.1 was not followed and employees’ absences were not regularly reviewed. As a result, many AO employees with “four or more unexcused late arrivals and/or unexcused early departures within a one-month period” were not, as Section 2(6)(C) requires, disciplined.

b. AO Failure to Enforce Other Provisions of Time and Attendance Policy

The AO has not enforced other provisions of its Time and Attendance Policy, including:

- Use of Floating Holidays on the day it was used, as opposed to one day in advance, as required by Section 3.1.
- Use of Vacation Time instead of Comp Time despite having more than 40 hours of Comp Time in the time bank, in violation of Section 3.2.

The ACA is working with HR, the DOC and Cook County’s Bureau of Technology to address these issues through enhancements to the AO’s CCT system. But policy compliance also will require improved supervisor performance and HR supervision.

### **3. Overtime Policy**

The AO has issued overtime since the Fourteenth Report, although less since November 2019, based on the assessment cycle. Also, there has been no overtime in the last month since the shutdown. The ACA monitors all AO overtime actions and provides feedback to the AO.

Based on the reduction of overtime, there are fewer violations by number although the ACA continued to see the following: (1) more overtime being worked than allowed via the notice of overtime; (2) inadequate documentation/basis for why overtime was issued without advance notice; (3) failure to require employees to perform mandatory overtime; (4) failure to identify how employees were selected for overtime; (5) insufficient, incorrect and missing documentation on overtime forms, including incorrect calculation of overtime; and (6) failure to provide timely notice of overtime to ACA.

### **4. Discipline Policy**

A revision to the AO's Discipline Policy, advocated by the Director of Human Resources upon his August 2019 arrival, was to allow disciplinary investigations and decisions to be made by non-HR or Legal personnel, ostensibly to be overseen by HR. Plaintiffs and the ACA agreed to allow HR a try. Without going into the weeds, this approach does not seem to be working. For example, while HR is conducting the investigations, it is not completing the Disciplinary Action Forms ("DAF") and the Director of HR is not issuing the discipline, as the policy requires. This is placing more responsibility on the supervisor than the policy allows. And given the issues that supervisors are having in implementing more routine Shakman-related policies, it seems unrealistic to expect them to accomplish more complex disciplinary investigations. The ACA will

be memorializing her recommendations – which will include returning HR to its more traditional role in disciplinary actions - in the current round of revisions to the Discipline policy.

**F. Assessment of the Director of Compliance**

As the DOC, hired in April 2019, has been on the job for a year, this seems an appropriate time for ACA to comment on his job performance pursuant to Section V(D) of the Employment Plan (“the ACA may monitor any and all aspects of the DOC’s job performance”). The DOC’s essential job duties are described in Section V(A) of the Employment Plan and the DOC position description. The ACA’s assessment is based on the DOC’s assigned duties and her interaction with and observation of him over the past year.

Overall, the ACA views the DOC as competently performing his job. He readily identifies Shakman compliance issues and appears committed to assisting the AO in achieving Substantial Compliance. He also was an effective presenter at the Employee Handbook training and appears in AO training efforts. And he has been actively engaged in assisting the AO enforce its Time and Attendance policy, including the audit of potential sick time abuse.

An essential DOC job duty is communicating to the AO information, observations and assessments on the implementation of employment practices and policies. In early 2020, the ACA expressed concern to the DOC that he was not sufficiently communicating that information to the AO. The DOC addressed the issue by issuing weekly reports in which such information is included. Also, according to the DOC’s March 15, 2020 Semi-Annual Report, he began attending AO weekly senior leadership meetings in late 2019.

The ACA also expressed concern to the DOC that he was not adequately performing the essential job duty of monitoring Employment Actions, for which the DOC will be solely responsible when the AO achieves Substantial Compliance; that seems to have improved. The

ACA is appreciative of the DOC's willingness to engage in candid discussions and looks forward to a continued collaborative effort towards Substantial Compliance.

**G. Assessment of the Human Resources Function**

Substantial Compliance cannot be achieved without a professional, effective Human Resources function. *See* Section III.I of the Employment Plan. The AO employee responsible for the HR function is Chief Administrative Officer ("CAO"), whose duties include but extend beyond HR. The AO's initial CAO served until December 30, 2019, when she became the County Budget Director. While there were initial bumps in the road, this talented and hardworking CAO recognized and accepted active Shakman monitoring, was pushing forward the elements required for Substantial Compliance and had a good working relationship with the ACA.

Reporting to the CAO is the Director of Human Resources. The AO's initial Director of HR was employed until August 2019. Her contributions to Shakman compliance were limited. The AO hired a replacement Director of HR in August 2019. As recounted in the Fourteenth Report, his tenure began with considerable strife with the ACA, which never abated, as he was not receptive to ACA feedback and continually sought to avoid what he characterizes as the "transaction costs" attendant to Shakman oversight - even if they are required by the Employment Plan or Shakman-related policies.

On February 24, 2020, the AO hired a replacement CAO, who came from the private sector. As she was getting acclimated to Shakman compliance, the crisis struck. The ACA had virtually no contact with new CAO until April 16, 2020, through a Zoom meeting facilitated by the Chief Deputy Assessor, who also participated (as did the DOC). At that meeting, the ACA was informed that the new CAO would be the AO's Shakman liaison per Section I(E) of the Agreed Order, supported by the Director of Legal as the CAO is not a lawyer, and the Director of HR's interaction



with the ACA will be significantly reduced. If the AO carries out this personnel change as described it should result in a more cordial and productive working relationship with the ACA, which is integral to the AO/Plaintiffs'/ACA's shared goal of Substantial Compliance.

**IV. THE ACA'S ACTIVITIES AS INTERIM DOC SINCE THE FOURTEENTH REPORT**

On December 4, 2018, the Court appointed the ACA to simultaneously serve as the Interim DOC as a result of the DOC's resignation. The ACA held that post until April 29, 2019, when the new DOC's AO employment began. She continues to work on the follow-up investigation regarding the hiring of the Executive Assistant to the Chief Deputy Assessor.

**V. ACTION ITEMS**

It has been the ACA's practice to end her reports with recommendations to the Court, often suggesting that deadlines be imposed for the completion of significant items. Court-imposed deadlines do not seem feasible now given Judge Schenkier's upcoming retirement and the court shutdown. But based on the AO's expressed intent to work towards Substantial Compliance even under the current circumstances, the ACA will confer with Plaintiffs and the AO to discuss whether we can set target dates for completing the following:

- A. Action Item No. 1 - Employment Plan:** The parties and the ACA should agree on a date for finalizing the Employment Plan, as well as scheduling any meetings that would facilitate closure.
- B. Action Item No. 2 – Employee Handbook:** The parties and the ACA should agree on a date for finalizing the Employee Handbook, as well as scheduling any meetings that would facilitate closure.
- C. Action Item No. 3 – Time and Attendance Policy:** The AO, DOC and ACA should agree on the next steps required to facilitate AO compliance, including scheduling any meetings that would facilitate these next steps.

The ACA looks forward to a return of normalcy, as do we all. Until that happens, she and her team will use their best efforts to carry out the duties assigned by the Agreed Order.

Respectfully submitted,

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Dated: April 21, 2020

**CERTIFICATE OF ELECTRONIC FILING**

I, Matthew D. Pryor, the undersigned, do hereby certify that on April 21, 2020. I electronically filed a true and correct copy of the foregoing **Fifteenth Report of the Assessor Compliance Administrator for the Cook County Assessor** using the CM/ECF system, which sends notification of such filing to all registered users.

/s/ Matthew D. Pryor  
Counsel to the ACA