

**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.)	

**AMENDED FOURTEENTH 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 Amended Fourteenth Report to the Court:

I. INTRODUCTION

On June 13, 2019, the ACA filed the Thirteenth Report to the Court (“Thirteen Report”). Doc. No. 6079. 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 Fourteenth 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 Thirteenth Report.

This is the ACA’s second report since the December 3, 2018 start of Assessor Fritz Kaegi’s administration. In those ten months, Assessor Kaegi and his team have not grasped the level of

scrutiny by the ACA and Plaintiffs that comes with the Agreed Order by which the AO is bound. This lack of understanding is demonstrated by, *inter alia*, the AO's taking or attempting to take Employment Actions without recognition and/or regard for *Shakman* implications; rejecting as out-of-hand reasonable interpretations of the Employment Plan by Plaintiffs' counsel (who has been at this for over a decade); and resisting *Shakman*-related concerns voiced by the ACA. Exempt employees have blamed "Shakman" for policies about which non-Exempt employees have expressed displeasure and challenged the need to hire in compliance with the Employment Plan.

This is not an effective path towards Substantial Compliance, which under the Agreed Order 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 Decrees¹ 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.

In fact, progress towards Substantial Compliance has been modest since the Thirteenth Report. The long-overdue revisions to the Employment Plan have not been accomplished. None

¹ 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.

of the Position Descriptions (union or non-union) have been rolled out - so the Performance Evaluation process has not started. The Employee Handbook was rolled out on September 30, 2019 and training was done, although there are and were issues regarding both. Policy implementation continues to need improvement. The Human Resources function remains a work presumably in progress.

As the Court has said many times, *Shakman* compliance comes from the top. At the last status on August 19, 2019, Assessor Kaegi told the Court: “I consider achieving substantial compliance something that’s on the critical path of me doing a good job.” If that is the case, and the ACA does not doubt that it is, the Assessor’s path will be smoother if the AO accepts the ACA and Plaintiffs’ scrutiny as well as the collaboration towards Substantial Compliance they offer.

II. OVERVIEW OF THE ACA’S ACTIONS SINCE THE OCTOBER 31, 2018 THIRTEENTH 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 Thirteenth 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;
- reviewed and commented on the AO's proposed revisions to *Shakman*-related employment policies;
- reviewed and commented on the AO's failure to roll out union or non-union position descriptions or start the performance evaluation process for any employees;
- provided significant input into the AO's efforts at implementing *Shakman*-related employment policies, including regular feedback to the AO;
- interviewed and conducted desk audits and exit interviews of AO employees; and
- conducted follow-up investigations based on the ACA's service as court-appointed Interim Director of Compliance ("DOC") from December 5, 2018 to April 29, 2019.

III. THE ASSESSOR'S PROGRESS TOWARDS SUBSTANTIAL COMPLIANCE

A. The Employment Plan Has Not Been Revised

Substantial Compliance requires an Employment Plan. The AO's Employment Plan was approved by the Court, effective August 5, 2016, with modest amendments since then. The parties and the ACA agree that a significant overhaul is required. Plaintiffs and ACA provided their consolidated revisions in February 2019. The AO provided its comments in June 2019. Plaintiffs and ACA provided their consolidated response in August 2019.

At the August 19, 2019 court status, the AO said it would be able to discuss the revisions in early October 2019. The Court said, "Obviously we need to get an employment plan in place...So I really do want to see this accomplished in terms of you all meeting about this by that early October date." On September 30, 2019, Plaintiffs and ACA proposed meeting on October 10, 2019. The AO has not responded.

B. Neither the Union or Non-Union Non-Exempt Position Descriptions Have Been Rolled Out and the Performance Evaluation Process Has Not Begun²

On taking office, the Assessor was presented with revised and updated union and non-union non-Exempt position descriptions, with a few identified legacy issues, that resulted from about a year of hard work by the parties and the ACA.³ The Berrios administration did not roll these position descriptions out since completion was on the eve of the Kaegi administration.

The Kaegi administration wished to review the union and non-union non-Exempt position descriptions. The process took longer than expected. But by July 12, 2019, in consultation with Plaintiffs and the ACA, they all were reviewed and revised. The non-union position descriptions were ready to be rolled out. The union position descriptions were subject to a 30-day union review.

Nothing has happened since July 12, 2019. As to the union position descriptions, at the August 19, 2019 court status the AO said it was in discussion with the union and the County and “hoped to be where we need to be with the discussion in the next several weeks.” While the AO said it could not commit to a date, it represented “we’re not far.” No further information has been forthcoming.

As to the non-union position descriptions, on September 11, 2019, in response to Plaintiffs and the ACA’s requests for updates, the AO said it was “working on a timeline” for the roll out and would provide Plaintiffs and the ACA with an update “at a later date.”

While the ACA recognizes that the AO has many projects on its plate, finalizing the union and non-union position descriptions – and initiating the long overdue performance evaluation

² Section IV.J of the Employment Plan requires the AO to review Position Descriptions to make sure they are current and accurate. *See* Employment Plan at 19 - 20; Doc. No. 4651 at PageID Nos. 29684 – 85. This is a critical step towards achieving Substantial Compliance. Updated and accurate Position Descriptions are the foundation not only for appropriate hiring but for many other employment actions including performance evaluations and discipline.

³This work included, but was not limited to, line-by-line review of every non-Exempt position description based on over 150 desk audits of AO employees.

process – presumably should be high on the list as Substantial Compliance cannot be achieved without this.

C. The Employee Handbook Has Been Rolled Out and Training Has Been Completed

1. Issues Related to the Employee Handbook

On September 30, 2019, a revised Employee Handbook was rolled out. This is an important step towards Substantial Compliance.⁴ But before the Employee Handbook even was rolled out, issues arose.

The new Director of Human Resources (date of hire August 19, 2019) has taken the view that he can unilaterally change negotiated *Shakman*-related policies. The first was the Temporary Assignment Policy. At the pre-rollout Employee Handbook training, employees were unhappy because the policy does not allow experience gained at a temporary assignment to be used when applying for a job. Rather than informing employees that the provision was designed to eliminate the chance of unfair advantage to those in temporary assignments or unfair disadvantage to those who were not, the new Director of Human Resources inappropriately blamed it on “Shakman.” He also indicated to Plaintiffs, the ACA and DOC that he intended to remove the provision.

The second was the negotiated Discipline Policy. It requires disciplinary investigations and disciplinary decisions to be done by HR or the Legal Department. The new Director of Human Resources apparently thinks these functions are better delegated to non-HR or Legal Department supervisors so he is assigning these functions to them. The DOC and ACA have made it clear that

⁴ The Employment Plan requires HR to revise and maintain an Employee Handbook to be distributed to all employees that effectuates the Employment Plan. Section IV.B. The AO’s Employee Handbook includes policies required by the Employment Plan (“*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.

this violates the policy. The new Director of Human Resources has ignored the DOC and ACA's objections. He continues to make policy-violative assignments.

When the DOC, ACA and Plaintiffs challenged the new Director of Human Resources' conduct, he claimed:

[T]he AO has the ability to amend its Employee Handbook at any time per Article IV.B of the Employment Plan. Prior to doing so, we must provide the DOC and ACA at least 14 days' notice for purposes of reviewing the proposed amendments and providing comment. *If you do provide comments, we are permitted to review them and determine if the comments will be incorporated.*"

(Emphasis supplied.) This is strong stuff from someone who had been on the job less than a month. It's also wrongheaded.

Section IV.B of the Employment Plan states: "HR may revise and update the Employee Handbook as required, provided HR shall first send a copy of the proposed revision to the DOC, ACA...and the Plaintiffs' Counsel...for comment...If comments are received, HR will review the comments and may revise the policy prior to revising the Employee Handbook." While Section IV.B may not technically require AO/HR to consult with Plaintiffs, the DOC and ACA before revising *Shakman*-related policies, that is the prudent course if the AO wishes to achieve Substantial Compliance.

At Plaintiffs and the ACA's insistence, the new Director of Human Resources has provided Plaintiffs, the ACA and DOC with all of the *Shakman*-related policy revisions he is seeking. Plaintiffs and the ACA, and presumably the DOC, are reviewing the suggested revisions. When the parties meet to discuss them, the ACA assumes the new Director of Human Resources will have a better understanding of what is required for the AO to achieve Substantial Compliance.

2. Employee Handbook Training

The AO's Employee Handbook training was for a total of four days; about half devoted was to *Shakman*-related policies. About one-half day was devoted to supervisor training on *Shakman*-related policy implementation. The Employee Handbook training was conducted for four weeks. ACA monitors attended many of the sessions that addressed *Shakman*-related policies.

The ACA lauds the AO for completing the Employee Handbook training which was a considerable undertaking and an important step towards Substantial Compliance.

D. Assessment of the Assessor's Hiring Practices

The Employment Plan provides for five separate hiring processes: (1) Exempt hiring; (2) Executive Assistant hiring; (3) DOC hiring; (4) "Actively Recruited" hiring; and (5) non-Exempt hiring. Substantial Compliance requires the ability to hire in compliance with each of these schemes. Since the Thirteenth Report, Assessor Kaegi has hired employees in each of these categories, except the DOC who was hired prior to the Thirteenth Report, with varying results.

1. Exempt Hiring

The AO has 25 Exempt positions. Twenty-one positions were filled as of December 3, 2018, the first day of the Kaegi administration. Of those 21, five no longer are employed by the AO. The remaining four Exempt positions subsequently were filled. Of those, two no longer are employed by the AO. So seven of the 25 Exempt positions (or 28%) have been vacated in the ten months that the Assessor has been in office. The ACA attempts to conduct exit interviews of all departing Exempt employees. She will continue to do so.

Since the Thirteenth Report, the AO has hired five Exempt employees. One, the Senior Data Scientist (Residential), hired as of July 22, 2019, submitted his resignation on September 23, 2019, and will separate on October 4, 2019. The four other Exempt hires since the Thirteenth

Report were replacements: Director of Communications, Director of Human Resources, Director of Outreach and Engagement and a Legal Counsel. These hirings were conducted in accordance with the Employment Plan.

Besides the Senior Data Scientist (Residential), two Exempt positions are vacant: (1) Chief Policy Officer (resignation date September 25, 2019; separation date October 4, 2019); and (2) Director of Policy, which has been vacant since July 12, 2019. The AO has proposed a candidate for Chief Policy Officer; Plaintiffs, the ACA and DOC concur that he has the Minimum Qualifications for the job.

2. Executive Assistant Hiring

The AO hired one Executive Assistant since the Thirteen Report. The hiring was in compliance with the Employment Plan.

3. “Actively Recruited” Hiring

Since the Thirteenth Report, the AO hired the Director of Training and is in the process of filling several manager positions in the Valuations Department under the “Actively Recruited” hiring process.

a. Director of Training: June 24, 2019 date of hire

The Director of Training was hired as of June 24, 2019. Several technical errors were committed but the hiring was largely compliant with the process.

b. Managers – Commercial Valuations (2) , Residential Valuations (2) and Special Properties: ongoing

These positions initially were posted on Taleo in May 2019. The positions had to be reposted because the initial posting required applicants to attach resumes and educational transcripts and indicate experience with Word and Excel and none of the applicants did that. The

July 2019 posting eliminated the requirements that caused the difficulty. This resulted in a pool of applicants for each position. The current status is:

- Commercial Valuations - two offers were made and rejected; the AO is contemplating next steps.
- Residential Valuations – two offers were made and accepted.
- Special Properties – no offers have been made; process is ongoing.

The hiring for these 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 concern is comments by the Deputy involved with these hirings who repeatedly has expressed discontent with the interview and selection processes and questioned the need to hire in compliance with the Employment Plan. The DOC has been effective in addressing these comments.

4. General Hiring Process: Non-Exempt Hiring

a. Senior Human Resources Generalist: August 5, 2019 date of hire

This position was posted in April 2019. It was the Kaegi administration's first new hire under the General Hiring process. The validation of applicants did not go smoothly as the then Director of Human Resources and the Human Resources Generalist were not conversant with the process. (The Director of Human Resources has been replaced and the Human Resources Generalist has improved.) There were technical errors in the interview process and in the production of the posting file but ultimately the hiring was Employment Plan compliant.

b. Manager of Payroll: ongoing

This position was posted in July 2019. The AO decided that it wished to include a skills test directed at applicants' ability to use Excel. The test has been conducted and the validation

process is expected to be forthcoming. The ACA will comment further on this hiring process in her next report.

E. Status of Shakman-related Policy Implementation

Implementing *Shakman*-related policies in compliance with the Employee Handbook remains a work in progress. The ACA continues to give feedback to the AO about policy violations. Presumably, the training supervisors received on the new Employee Handbook will reduce violations. A summary of the major *Shakman*-related policy implementation issues that the ACA continues to observe follows:

1. Temporary Assignment Policy

The Temporary Assignment Policy addresses the temporary assignment of a non-Exempt employee to a different non-Exempt position based on the AO's operational need. Under Section 3(A), the temporary assignment process is initiated by the Deputy of the Department with the operational need. Under Section 3(B), if the Chief Administrative Officer approves the request, she identifies the positions in the Departments that are eligible. The initial temporary assignment cannot exceed two weeks, although it can be renewed for up to a maximum of 90 days.

The Temporary Assignment Policy makes no provision for extending temporary assignments to County employees who do not work for the AO. Also, under Section XI.G of the Employment Plan, employees hired through the Executive Assistant Hiring Process are not eligible for temporary assignments.

- a. Improper attempt to conscript County employees to perform AO temporary assignments

On June 18, 2019, the Chief Deputy Assessor sent a letter to the Cook County Commissioners requesting the "assistance of as many of your staff that you can spare to answer questions from taxpayers who call our office" when the 2nd installment tax bills go out in July.

The Chief Deputy Assessor also informed the Commissioners that AO would be conducting training courses for their staff.

The Chief Deputy Assessor wrote the June 18, 2019 letter without consulting the DOC, ACA or Plaintiffs. When Plaintiffs and the ACA learned of this through a report in the *Chicago Sun Times*, Plaintiffs' counsel immediately challenged filling AO temporary assignments with Shakman Exempt Commissioner staff, as well as the AO's failure to give notice to the ACA.⁵

The Chief Deputy Assessor's June 18, 2019 letter made its way to Cook County's Independent Inspector General and Shakman Compliance Officer who appropriately counseled the Commissioners that "the Cook County Employment Plan, Supplemental Policies and Personal Rules do not contemplate *Shakman* exempt employees performing the work of Shakman non-exempt employees in the Assessor's Office." As the Inspector General opined in another *Sun Times* article, the AO's plan "violates the principles that Shakman stands for."

While the AO withdrew its request to the Commissioners, this incident indicates the Chief Deputy Assessor's apparent inability to identify a significant *Shakman* issue, a lack of knowledge about the notice required to the DOC and ACA for all employment actions and the failure to seek counsel, internal or external, from those who do.

b. Improper attempt to include Executive Assistant in temporary assignment

On July 31, 2019, the AO's Manager of Payroll resigned and the AO reasonably undertook to fill the role through temporary assignments until the position could be filled. In violation of Section XI.G of the Employment Plan, the AO attempted to include a person hired through the non-competitive Executive Assistant Hiring Process. When the ACA apprised the AO of the issue, the Executive Assistant was withdrawn. This is another instance where the AO failed to recognize

⁵ At that point, Plaintiffs' counsel did not know whether the DOC had been given notice. He had not.

a *Shakman* compliance issue.

c. Failure to follow the temporary assignment process

The AO continues to violate section 3(B) of the policy by allowing the Deputy requesting the temporary assignment to decide what positions are eligible instead of the Chief Administrative Officer. Also, the requesting Deputy has at times improperly been allowed to identify a specific person for the temporary assignment even though the policy requires temporary assignments to be position-based. Additional violations have included failing to provide the ACA with required documentation for the temporary assignment and failing to provide timely notice.

2. Time and Attendance Policy

a. Modified and Flexible Work Schedules

Section 2.4(b) of the Time and Attendance Policy permits temporary modified or flexible work schedules that deviate from the 8:30 a.m. to 5:00 p.m. regular office hours if the AO's operational needs allow. Modified or flexible work schedules may not exceed six months.

The ACA is aware of three modified work schedules granted by the new Director of Human Resources since his August 19, 2019 arrival:

- Two were policy compliant.
- One was not policy compliant as the new Director of Human Resources granted a permanent schedule change.⁶

b. Attendance "Points" Discipline

As discussed in the Thirteenth Report, in a February 4, 2019 memo entitled "Guidance on Dress Code, Time and Attendance, and Overtime Policy," the AO unilaterally "suspended" the

⁶ A temporary modified or flexible work schedule is different from a permanent shift change under Section 2.4(a) of the Time and Attendance Policy. The opportunity for a permanent shift change must be offered to all employees in the position for which there is a shift change opportunity and granted on the basis of seniority.

AO's longstanding "points" discipline policy. As confirmed by interviews with the then-Manager of Payroll and two AO timekeepers, there has been no enforcement of timely attendance since February 2019 which has resulted in essentially unfettered managerial discretion and employee abuse.

The Time and Attendance policy in the new Employee Handbook replaces "points" discipline with this standard: "Four or more unexcused late arrivals and/or unexcused early departures within a one-month period shall result in disciplinary action, up to and including termination of employment." Enforcement will have to start with managers who will have to keep close track of, *inter alia*, their reports' late arrivals and unexcused early departures.

Plaintiffs and the ACA agreed that the AO could try this standard. But the ACA will be closely monitoring the AO's enforcement efforts.

3. Discipline Policy

As discussed above, the new Director of Human Resources is conducting discipline in violation of the policy by delegating disciplinary investigations and/or decision making to managers even though the policy plainly requires these be done by Human Resources or the Legal Department. The new Director of Human Resources persists despite clear direction from the DOC and ACA that his conduct is not policy compliant and that they disagree with his approach.

4. Overtime Policy

a. FLSA issues

The part of the AO's February 4, 2019 "Guidance on Dress Code, Time and Attendance, and Overtime Policy" memo about overtime stopped the AO's longstanding practice of allowing FLSA Exempt employees to receive "compensation or the banking of Time Due for overtime."

The memo defined AO FLSA Exempt employees as: “all Shakman Exempt employees and employees that do not belong to a bargaining unit.”

Despite the February 4, 2019 memo, “employees that do not belong to a bargaining unit” continue to receive compensation or Time Due for overtime worked. And it has been a considerable amount. Plaintiffs and the ACA long had urged the prior Assessor to eliminate overtime for FLSA Exempt employees. They encourage the AO to follow its new policy and eliminate the practice.

b. Repeated policy violations

The AO has issued a large amount of overtime since the Thirteenth Report. This is typical after the Second Installment tax bills are issued in July, but significant amounts of overtime have continued to the present. The ACA monitors every AO overtime action and provides feedback to the AO. While a good percentage are policy compliant, the ACA continues to see repeated policy violations that fall into the following categories: (1) more overtime being worked than allowed via the notice of overtime; (2) inadequate documentation/basis for overtime issued without advance notice; (3) insufficient, incorrect and missing documentation on overtime forms, including incorrect calculation of overtime; and (4) failure to provide timely notice of overtime to ACA.

The AO has acknowledged the deficiencies and expects the recent Employee Handbook training will increase compliance. Given the potential for abuse, the ACA will continue to monitor and provide feedback on the AO’s compliance with all Overtime policy requirements.

F. The Human Resources Function, Which Must be Fully Functioning to Achieve Substantial Compliance, Remains a Work in Progress

Substantial Compliance cannot be achieved without a professional, effective Human Resources function. *See* Section III.I of the Employment Plan. Since the Thirteenth Report, there is a new Director of Human Resources and a new Senior Human Resources Generalist. With the

pre-existing Human Resources Generalist, this brings the Human Resources personnel to three. Based on early reports, the new Senior Human Resources Generalist is performing well. And the Human Resources Generalist is improving.

As the Court said at the August 19, 2019 status, “[I]t is very important that the HR department be a very strong functioning department” because it is responsible for day-to-day implementation of the Employment Plan so “you have to have people who are up to that task.”

The Director of Human Resources is critical to implementing the Employment Plan. The ACA has concerns whether the new Director of Human Resources is up to the task. This is unexpected since his application materials stated that he worked at the Cook County Bureau of Human Resources, doing Employee Relations for two years and seven months, and had experience with Cook County’s Shakman Employment Plan.

In addition to the issues raised above regarding the new Director of Human Resources’ conduct, his comments in improperly granting the permanent schedule change, noted above, are telling. After asking the employee for additional information, the new Director of Human Resources explained: “[P]lease understand that I ask this because we need to be able to justify and support the accommodation...as these types of accommodations are scrutinized by the Shakman monitor.” Besides (again) inappropriately blaming Shakman, the new Director of Human Resources’ comment demonstrates a fundamental misapprehension of the Agreed Order and the Employment Plan which mandate AO employment policies and procedures – that are consistently followed – whether there is a Shakman monitor or not.

In the Court’s oft-repeated “three-legged stool” analogy required to achieve Substantial Compliance, Human Resources is one of those legs. Work remains to be done before this leg can properly support the stool.

IV. THE ACA'S ACTIVITIES AS INTERIM DOC SINCE THE THIRTEENTH 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. Since the last report:

- The AO responded to an Interim DOC investigative report and recommendation on August 9, 2019.
- An Interim DOC investigative follow up report was issued on August 13, 2019; the AO's response is due on October 14, 2019.
- Work continues on the follow-up investigation regarding the hiring of the Executive Assistant to the Chief Deputy Assessor.

V. **RECOMMENDATIONS**

As has been her practice, based on the foregoing, the ACA makes the following recommendations:

- A. **Recommendation No. 1** – The Court should impose a deadline for completing the revisions to the Employment Plan.
- B. **Recommendation No. 2** – The Court should impose a deadline for any further, current revisions to the Employee Handbook.
- C. **Recommendation No. 3** – The Court should impose a deadline for rolling out the non-union, non-Exempt position descriptions and the initiation of the performance evaluation process.
- D. **Recommendation No. 4** – The Court should exercise oversight over the rolling out of the union position descriptions, including setting completion goals.

Respectfully submitted,

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Dated: October 7, 2019

CERTIFICATE OF ELECTRONIC FILING

I, Matthew D. Pryor, the undersigned, do hereby certify that on October 7, 2019, I electronically filed a true and correct copy of the foregoing **Amended Fourteenth 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