

2026 Ethics Training Program for State Employees and Appointees

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

Introduction

Welcome to the 2026 Ethics Training for the Agencies under the Illinois Governor!

The Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG) developed this training based on the requirements set forth by the **State Officials and Employees Ethics Act** (<https://ilga.gov/Legislation/ILCS/Articles?ChapterID=2&ActID=2529>), (Ethics Act). This training will aid in the following ways:

- Help you better understand your duties and obligations under the Ethics Act.
- Provide guidance on ethical conduct issues.
- Provide context and examples for a better understanding.

The goal of this training is to ensure you have the information, tools, and resources to be the best State employee you can be. We all play an important role in the betterment of State government. Let's get started!

Your Role as a State Employee or Appointee

The Ethics Act requires State employees and appointees to complete an ethics training program each year. New State employees and appointees are required to complete the training within 30 days of starting their employment or appointment.

As a public servant, the citizens of the State of Illinois have put their trust in you. Adhering to ethical standards is critical to maintaining public trust and promoting integrity in State government. The Ethics Act, as well as other laws and agency policies, create a vital framework upon which decisions should be made and actions taken. Keep in mind a few simple concepts:

Be Truthful	Act in the Best Interest of the State	When in Doubt, Ask for Guidance
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The Role of the Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG)

The OEIG is an independent oversight agency whose mission is to promote an ethical workforce and enhance good governance in the agencies it oversees. The OEIG primarily accomplishes this through its investigations of fraud, waste, abuse, and violations of the Ethics Act and other laws, rules, and policies.

The OEIG investigates misconduct by employees of State agencies and boards, State universities, regional transit boards, regional development authorities, and those doing business with those entities. If the OEIG concludes an investigation and determines that there is reasonable cause to believe a violation occurred, it will draft and send a summary report regarding the investigation to the appropriate affected agencies and ultimate jurisdictional authorities.

The OEIG oversees Ethics Act-mandated trainings and makes Revolving Door determinations. In addition, the OEIG has a Division of Hiring & Employment Monitoring (HEM), which conducts compliance-based reviews of State employment procedures and hiring decisions to ensure that they are merit-based and justifiable.

For additional information, visit the OEIG website at oeig.illinois.gov (<https://oeig.illinois.gov/>).

The Role of the Executive Ethics Commission (EEC)

The EEC is an independent nine-person commission whose members are appointed by the Illinois Governor (5), Attorney General (1), Secretary of State (1), Treasurer (1), and Comptroller (1). The EEC's responsibilities and duties include but are not limited to conducting hearings and issuing determinations related to Ethics Act violations, overseeing Ethics Act trainings for State employees under its jurisdiction, and redacting and publishing Executive Inspectors General summary reports. The EEC is also responsible for providing administrative support services for each of the independent Chief Procurement Officers.

For additional information, visit the EEC website at eec.illinois.gov (<http://eec.illinois.gov/>).

Role of an Ethics Officer

"Ethics Officer" refers to the employee that each State agency has designated to oversee a variety of ethical responsibilities. A primary duty of an Ethics Officer is to act as a liaison between the agency and the OEIG and EEC.

Ethics Officers may also

- provide guidance on the Ethics Act based on publicly available decisions,
- review employees' Statements of Economic Interests,
- assist employees with Revolving Door paperwork and maintain the Revolving Door "c-list,"
- receive and refer complaints of employee wrongdoing, and
- ensure that all State employees fulfill their duty to complete ethics and harassment and discrimination prevention trainings.

The name and contact information for your Ethics Officer can be found on the [Ethics Officers page of the OEIG's website](https://oeig.illinois.gov/ethics/ethics-officers.html) (<https://oeig.illinois.gov/ethics/ethics-officers.html>).

Session 1: Duties of a State Employee

This session will review your duty to report misconduct, your duty to cooperate with investigations, and provisions that restrict retaliation for such actions.

Why is this important to you?

- Reporting misconduct is an important piece of ensuring good governance. The OEIG relies on employees and the public who are best situated to know of or witness wrongdoing.
- These duties to report and cooperate with the OEIG are so important that laws and rules prohibit retaliation against you for doing so.

Reporting Misconduct

If you witness misconduct or have evidence of it, you should report it to the proper authorities. [Executive Order 16-04](https://www.illinois.gov/government/executive-orders/executive-order-executive-order-number-4.2016.html) (<https://www.illinois.gov/government/executive-orders/executive-order-executive-order-number-4.2016.html>) imposes a specific duty on State employees to report alleged misconduct to the OEIG or your Ethics Officer. If you report misconduct to your Ethics Officer, they must promptly forward the report to the OEIG. It is also important to understand that Ethics Officers are required by the same order to promptly notify the OEIG if they become aware of any allegations of misconduct *before* conducting any internal agency investigation.

Reporting Misconduct

To report misconduct or a non-emergency violation of law, rule, regulation, or agency policy to the OEIG, you can do so via:

	OEIG website at oeig.illinois.gov (https://oeig.illinois.gov/).
	Toll-free hotline: 866-814-1113
	Telecommunications device for people who are deaf or hard of hearing: 888-261-2734
	Mailing a completed complaint form to: Office of Executive Inspector General for the Agencies of the Illinois Governor Attention Complaint Division 69 West Washington Street, Suite 3400 Chicago, Illinois 60602

You may report alleged misconduct to the OEIG anonymously; however, please provide sufficient details so an investigation can be initiated.

Cooperating in Investigations

As a State employee, you have an obligation to cooperate in OEIG investigations ([see 5 ILCS 430/20-70](https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&C) (<https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&C>)).

You must participate in interviews as requested, tell the truth, and not withhold information. Intentional omissions and knowingly making false statements can be considered failing to cooperate in investigations. Failing to cooperate in investigations may impede the investigation and is a serious violation of the Ethics Act and [Executive Order 16-04](https://www.illinois.gov/government/executive-orders/executive-order-executive-order-number-4.2016.html) (<https://www.illinois.gov/government/executive-orders/executive-order-executive-order-number-4.2016.html>).

Penalties for failing to cooperate in investigations may include disciplinary action, dismissal, and/or fines for violating the Ethics Act.

Real-life examples of penalties imposed include the following:

- **OEIG Case No. 23-00127** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/23-00127-craig-released-redacted-summary-report.pdf>): Employee terminated for failing to cooperate with OEIG investigators by providing untruthful statements during their interview.
- **EEC Decision 11-EEC-012** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/eeec-decisions/11eeec012-clayton-6-0.pdf>): \$4,000 fine for interfering with an OEIG investigation and for making intentionally false statements to OEIG investigators.
- **EEC Decision 20-EEC-004** (<https://eeec.illinois.gov/content/dam/soi/en/web/eeec/disciplinary-decisions-list/mcmechan-published-decision.pdf>): \$750 fine for making intentionally false statements and omissions during an OEIG investigation.

Knowledge Check: Cooperating in Investigations

Amanda works for the State and occasionally drives for a ridesharing app as a side gig; she has disclosed this secondary employment to her agency. Amanda is contacted by an OEIG investigator for an interview. During the interview, the investigator asks Amanda questions about her ridesharing business. Amanda doesn't want to get in trouble, so she answers the investigator's questions but purposefully leaves out some key details in her responses and denies working at any time that overlaps with her State job. After the interview, the investigator also asks Amanda to provide some documents related to her ridesharing job. Amanda never responds to the OEIG's request for documents. After the interview, the OEIG subpoenas records confirming that Amanda has driven for her side job at times that overlap with her State job.

Has Amanda cooperated with the OEIG's investigation?

- A. Yes, because Amanda attended the interview and answered the investigator's questions.

- Choice A is incorrect. Amanda's duty to cooperate requires more than just attending the interview. Although Amanda answered the questions posed by the investigator, she left out key facts and was not entirely truthful in her answers. Under the Ethics Act, failure to cooperate includes, but is not limited to, intentional omissions and knowing false statements. 5 ILCS 430/20-70 and 50-5(e).
- B. No, because Amanda intentionally omitted some information, lied about any time overlap, and failed to provide documents when requested by the investigator.
 - Correct!** Amanda's duty to cooperate requires more than just attending the interview; she must also provide truthful and complete responses to investigator questions. Under the Ethics Act, failure to cooperate includes, but is not limited to, intentional omissions and knowing false statements. In addition, intentionally obstructing or interfering with an investigation, such as by failing to provide documents requested by the OEIG, may constitute failure to cooperate with an OEIG investigation. Each of these actions is grounds for disciplinary action, including dismissal. 5 ILCS 430/20-70 and 50-5(e).
- C. Yes, because Amanda's agency is already aware of her secondary employment, she doesn't need to provide more details about it to the OEIG.
 - Choice C is incorrect. The fact that Amanda already reported her secondary employment does not negate her duty to cooperate with the OEIG in any interview regarding her secondary employment. Amanda's duty to cooperate requires more than just attending the interview; she must also provide truthful and complete responses to investigator questions. Under the Ethics Act, failure to cooperate includes, but is not limited to, intentional omissions and knowing false statements. 5 ILCS 430/20-70 and 50-5(e).

Understanding Retaliation Provisions

Reporting misconduct can be stressful. For example, you may be worried that if you report misconduct, others may respond negatively. It is important that you understand what the retaliation laws and policies are and how they may apply to you.

Under **Article 15 of the Ethics Act** (<https://ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430%2F&SeqStart=2400000&SeqEnd=31001>),

a State agency, employee, member, or officer cannot take any **retaliatory action** in response to an employee engaging in **protected activity**.

What is "Retaliatory Action"?

"Retaliatory Action" includes:

- reprimand,
- discharge,
- suspension,
- denial of promotion or transfer,
- demotion, or
- change in the terms or conditions of State employment.

What are "Protected Activities"?

"Protected Activity" occurs when a State employee:

- discloses (or threatens to disclose) conduct that is reasonably believed to be a violation of a law, rule, or regulation;
- provides information or testifies for an investigation into a violation of a law, rule, or regulation; or
- participates in a proceeding to enforce the provisions of the Ethics Act.

Similarly, under the **Illinois Whistleblower Act** (<https://ilga.gov/Legislation/ILCS/Articles?ActID=2495&ChapterID=57>), an employer may not take retaliatory action, or even threaten to do so, against an employee who engages in protected activity when the employee has a good faith belief that the conduct they are disclosing violates a State or Federal law, rule, or regulation or poses a substantial and specific danger to employees, public health, or safety.

Additionally, **Executive Order 16-04** (<https://www.illinois.gov/government/executive-orders/executive-order-executive-order-number-4.2016.html>), prohibits retaliation against State employees who raise genuine concerns about unethical, inappropriate, or illegal behavior.

What is *not* considered "Retaliatory Action"?

The Ethics Act and the Illinois Whistleblower Act **do not** prevent agencies from disciplining State employees for engaging in matters unrelated to protected activities.

For example, an agency may discipline a State employee for failing to follow agency policies. The agency may discipline an employee if it can show that it would have imposed discipline regardless of whether the employee made a report of misconduct.

Knowledge Check: Retaliation

James is a supervisor at a State agency, and he learns that one of his newer employees, Tonya, is planning to file a formal sexual harassment complaint against another employee, Dave. James isn't always present at Dave and Tonya's job site, and he doesn't know what happened between them. However, James has known Dave for years and considers him one of his top performers, and he believes it would be bad for agency operations if Dave received discipline or had to leave because of Tonya's allegations. Tonya has not been around as long, and even though her work has been good, James believes Dave is much more valuable to the agency.

When Tonya's performance evaluation comes up a few weeks later, James gives her a negative review, and he also starts assigning her to a shift he knows will interfere with her family obligations, even though he doesn't really need anyone else on that shift. James hopes this will prompt Tonya to quit, and that Dave's job will be secure.

Did James retaliate against Tonya?

- A. No, because even if James's actions seem unfair, Tonya's sexual harassment complaint is about Dave, not James. Therefore, James cannot be held responsible for retaliation.
 - Choice A is incorrect. The Ethics Act does not limit retaliatory conduct to the person accused of wrongdoing. Although Tonya's complaint was about Dave, James still engaged in retaliatory action against her after he learned she planned to file a complaint by changing her shift time without a legitimate reason and giving her an unwarranted negative performance review.
- B. No, because James is prioritizing what he thinks is best for the agency.
 - Choice B is incorrect. Even if James thought protecting Dave was better for agency operations, he engaged in retaliatory action by changing Tonya's shift time without a legitimate reason and giving her an unwarranted negative performance review. Tonya's plan to file a complaint was a contributing factor to James's actions, and there is nothing to suggest he would have taken the same actions if he had not learned about Tonya's planned complaint.

- C. Yes, because James's actions are in response to Tonya's plan to report what she may reasonably believe is unlawful conduct.
 - **Correct!** James took retaliatory action against Tonya because of her plan to report that Dave engaged in unlawful conduct. That violates the Ethics Act's retaliation provision.

Knowledge Check: Retaliation

Chris is a State agency employee who has not always gotten along well with his supervisor, Michelle. When Michelle implements a new system for processing paperwork, Chris finds it cumbersome, and he becomes frustrated and tells Michelle he will not use the new system. Michelle has a meeting with Chris and other employees in his division, and warns them that if any employee refuses to use the new system, she will consider it a failure to perform their job duties. Michelle documents the meeting, but she does not pursue any discipline against Chris at that time. Things grow more tense between them after that, and Chris feels he is being harassed and files a complaint with Michelle's supervisor. Chris also continues to refuse to use the new paperwork system. Michelle thereafter issues formal discipline to Chris, at the first step of the agency's progressive discipline policy, for failure to perform job duties.

Did Michelle retaliate against Chris?

- A. Yes, because she only disciplined him after he filed a complaint against her, when she could have done so earlier.
 - Choice A is incorrect. Even though Michelle did not discipline Chris right away, he failed to perform job duties, and she began to address the issue when it started, which was before he filed a complaint against her. Michelle even warned Chris that continued refusal to use the new paperwork system would be considered a failure to perform his job duties.
- B. No, because Chris did not file a formal external complaint and only reported it internally to Michelle's supervisor.
 - Choice B is incorrect. The Ethics Act prohibits retaliation for protected activity, which can include complaints filed with a public body as well as internally to a supervisor.
- C. No, because the discipline was for his refusal to use the new paperwork system, which Michelle previously warned him about.
 - **Correct!** Michelle's actions were likely not retaliatory. After Chris repeatedly refused to use the new system, Michelle issued discipline for that reason. Michelle held a meeting after Chris's first refusal, warning that continuing to do so would be considered a failure to perform job duties. The meeting occurred before Chris filed a complaint. Michelle issued discipline at the first step of the agency's progressive discipline policy and did not penalize him beyond agency guidelines.

Rights and Remedies to Retaliation

The Ethics Act and the Illinois Whistleblower Act both provide legal rights and remedies related to retaliation for engaging in protected activity. If an employee is successful in a retaliation lawsuit, the following remedies may be available, among others.

- Reinstatement of employment and any lost seniority rights
- Back pay with interest
- Compensation for incurred costs, such as litigation costs and reasonable attorneys' fees

Agencies may discipline State employees who engage in retaliatory conduct in violation of the Ethics Act, including with discharge. The EEC may also take administrative action, including imposing fines, against the employee.

Moreover, under the Illinois Whistleblower Act, the Attorney General may initiate or intervene in a civil action in the name of the People of the State to obtain relief if it has reasonable cause to believe that a person or entity has engaged in retaliatory action.

Session 1: Highlights

Report Misconduct.

You have a duty to cooperate.

Retaliation is prohibited.

Session 2: Avoiding Improper Influences

This session outlines a few ethics rules and laws that work to restrict efforts by individuals or entities to influence official actions by State employees, including the gift ban, official misconduct, and bribery.

Why is this important to you?

- State employees' decisions should be in the best interest of the State and not for personal gain. Restricting what can be offered or given to a State employee helps ensure fair and appropriate decision-making by everyone.

The Gift Ban - Who is a Prohibited Source?

As a State employee, you (and some of your family members) may not ask for or accept a gift from a prohibited source. This is referred to as the gift ban (see [Article 10 of the Ethics Act](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430%2F&SeqStart=190) (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430%2F&SeqStart=190>)).

Prohibited sources are people or companies that:

- seek official action from you, your supervisors, or your State agency;
- do business with, or seek to do business with, your State agency;
- participate in activities regulated by you, your supervisors, or your State agency;
- have interests that are substantially affected by the performance (or lack of performance) of your official duties; or
- are registered lobbyists or must register as a lobbyist with the Illinois Secretary of State.

Agents or spouses of a prohibited source, or an immediate family member living with a prohibited source, are also considered prohibited sources.

The Gift Ban - What is Considered a Gift?

Gifts are generally what you would expect, including payment for entertainment, offering hospitality, loans, discounts, and any other tangible or intangible items that have monetary value. Examples of gift ban violations are listed below:

- **OEIG Case No. 24-00353** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/24-00353-thomas-d--summary-report-redacted-final.pdf>): State employee accepted gifts of discounted lodging, transportation, wine, and food from two entities that had interests that may be substantially affected by the employee's performance or non-performance of his official duties.
- **OEIG Case No. 19-01088** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/19-01088-prieto-1-0.pdf>): State employee accepted a ticket to attend a golf outing worth approximately \$400 from a prohibited source who held State contracts.
- **OEIG Case No. 17-00769** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/17-00769-aubin-capuani-and-osfm-3-0.pdf>): State employee accepted a \$200 gift certificate from a prohibited source seeking a State permit.
- **EEC Decision 16-EEC-005** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/eec-decisions/16eec005-periman-5-0.pdf>): State employee accepted an airline ticket for personal use from a company they regulated as a part of their official duties.

The Gift Ban - Actions to Take If You Receive a Gift

If you do receive a gift from a prohibited source, there are a few things you can do to make sure you do not violate the Ethics Act. Specifically, you can:

- return the gift to the prohibited source

OR

- give the gift, or a donation equal to the gift's value, to a non-profit, tax-exempt organization.

But remember, under the gift ban provisions, if you receive a prohibited gift, you must take one of these actions **PROMPTLY**.

The Gift Ban - Exceptions

Section 10-15 of the Ethics Act (<https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430>)

lists some exceptions to the gift ban that allow you to accept gifts from a prohibited source. For example, you might be able to accept:

- a gift from a long-time friend or relative
- educational materials and missions
- items available to the general public on the same terms
- travel expenses for attendance at a meeting to discuss State business

For an exception to be made for educational materials and missions or travel expenses, you must follow additional steps **outlined in the Illinois Administrative Code** (<https://www.ilga.gov/commission/jcar/admincode/002/002016200G07000R.html>), and consider the additional Executive Order 15-09 restrictions outlined on the next slide.

If you are considering accepting a gift, it is important to review your State agency's policies, which may be more restrictive than the Ethics Act's gift ban. Additionally, you should ask your Ethics Officer for guidance.

To be safe, you can simply decline anything of value offered to you (other than your salary and other State employment-related benefits).

The Gift Ban - Additional Policies to Consider

Executive Order 15-09 (<https://www.illinois.gov/government/executive-orders/executive-order/executive-order-number-9.2015.html>), also established more restrictive gift policies, such as:

State employees must obtain approval from the Executive Director of the EEC **before** their agencies can accept payment from a prohibited source for travel expenses related to meetings or educational materials and missions.

State employees can only accept *de minimis* meals or refreshments at business meetings or events paid for by prohibited sources. "*De minimis*" is not defined in the Executive Order, but by its ordinary meaning, it would cover low-value food or refreshments that typically accompany a business meeting, such as a cup of coffee or donuts.

The exception that allows employees to accept gifts that do not exceed up to \$100 cumulatively, or food and refreshments up to \$75 per day in a calendar year, does **NOT APPLY** to State employees.

Knowledge Check: Gift Ban

Archie is an engineer for a State agency. As part of his State duties, Archie is scheduled to attend a conference where he will be meeting with water industry professionals to discuss innovations in the field. Fern is the CEO of a company that supplies water testing equipment to Archie's State agency under a contract, and she is also planning to attend the conference. Fern tells Archie that her company's travel department can book and pay for first-class airline tickets for Archie to attend the conference, as they are already arranging for Fern's flights.

May Archie accept?

- A. Yes, because there is an exception to the Ethics Act's gift ban for travel expenses.

- Choice A is incorrect. Although the Ethics Act's gift ban contains an exception for travel expenses for a meeting to discuss State business, there are other steps that must be taken for the exception to apply. For example, the agency's Ethics Officer and the Executive Director of the Executive Ethics Commission must provide advance approval for the payment of the travel costs. In addition, the prohibited source would need to arrange payment or reimbursement of the costs directly with the agency rather than with the employee. First-class flights also would not be consistent with State travel rules, which generally require travel for State business to be by the most economical mode of transportation available.
- B. Yes, because it benefits the State agency to not have to pay for Archie's work-related travel expenses.
- Choice B is incorrect. While it might seem like the agency is benefitting from the arrangement, there are important rules in place as a safeguard to ensure that there is no conflict of interest or even an appearance of one. For example, the agency's Ethics Officer and the Executive Director of the Executive Ethics Commission must provide advance approval for the payment of the travel costs. In addition, the prohibited source would need to arrange payment or reimbursement of the costs directly with the agency, rather than with the employee. First-class flights also would not be consistent with State travel rules, which generally require travel for State business to be by the most economical mode of transportation available.
- C. Yes, as long as he lists "Travel was at no cost to the State" on his State travel voucher that he submits after the trip.
- Choice C is incorrect. For a prohibited source to be permitted to pay for an employee's travel expenses for a meeting to discuss State business, there are various additional steps that must be taken. For example, the agency's Ethics Officer and the Executive Director of the Executive Ethics Commission must provide advance approval for the payment of the travel costs. In addition, the prohibited source would need to arrange payment or reimbursement of the costs directly with the agency, rather than with the employee. First-class flights also would not be consistent with State travel rules, which generally require travel for State business to be by the most economical mode of transportation available.
- D. No, because the payment of the travel expenses was not approved in advance by the agency Ethics Officer and the Executive Director of the Executive Ethics Commission, the arrangement was made with Archie rather than with his agency, and because the travel is by first-class flights.
- **Correct!** This answer is the best choice. Fern's company is a prohibited source, because it does business with Archie's agency. Therefore, in order for the company to be allowed to pay for Archie's travel expenses for State business, the agency's Ethics Officer and the Executive Director of the Executive Ethics Commission must approve it in advance. In addition, the prohibited source would need to arrange payment or reimbursement of the costs directly with the agency, rather than with the employee. Finally, taking first-class flights would not be consistent with State travel rules, which generally require travel for State business to be by the most economical mode of transportation available.

Official Misconduct

State employees who engage in certain misconduct may also be committing a crime. For instance, State employees commit official misconduct when, in their official capacity, they:

- intentionally or recklessly fail to perform any mandatory duty;
- knowingly perform an act they know is illegal;
- perform an act outside of their lawful authority to try to obtain a personal advantage for themselves or anyone else; or
- solicit or accept a bribe.

Official misconduct is a Class 3 felony ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A)

[MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A)
If you commit official misconduct, you may also forfeit your State office or employment.

Bribery

Accepting a bribe in exchange for performing an official act is a type of official misconduct. Bribery happens when you receive or ask for any property or personal advantage in exchange for performing or not performing an official act. Bribery also occurs when you accept any property or personal advantage in exchange for influencing someone else to act or not.

You cannot accept anything of value in exchange for taking an official action. For example, this means that you cannot receive cash, free services, loans, or travel expenses for authorizing State financial aid, hiring a particular individual, signing or renewing a State contract, issuing or expediting a professional license, or any other official duty as a State employee. If you engage in any of these activities, you may face **criminal bribery charges, classified as a Class 2 felony** ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A)

[MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A)

There are NO Exceptions to Bribery

While there might be limited situations where you can accept a gift from a prohibited source, these gift ban exceptions **DO NOT** apply to the bribery criminal statute.

You can **never** accept or solicit gifts in exchange for performing an official act. If someone tries to bribe you, you **must** decline the bribe **AND** report the bribery attempt to the Illinois State Police. **Failing to report a bribe or an offer of a bribe is a Class A misdemeanor** ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A)

[MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A)

Session 2: Highlights

Gifts from prohibited sources should generally not be accepted.

Check exceptions and your agency's policies when considering accepting gifts.

You are prohibited from accepting anything of value in exchange for performing an official act.

Session 3: Politically-Related Activities

As noted earlier, it is important that State employees' work is free from undue influence—both in time spent and decision-making. To further this, the Ethics Act prohibits certain political activities during work time, with State resources, or on State property. This session will review prohibited political activities, prohibited offers or promises, and provisions regarding public service announcements.

Why is this important to you?

- Government employees may work with individuals who are running for a political office. Rules exist to help ensure that your State work-time and decision-making are not improperly affected, influenced, or interfered with by political interests.

Prohibited Political Activity Provisions

The Ethics Act ([5 ILCS 430/5-15](https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430)) provides that State employees cannot intentionally participate in certain political activities while on State property, while working their State job, or when using State resources, including State email accounts, phones, printers, computers, or office supplies. Additionally, an employee cannot require another employee to perform any prohibited political activity. Note that you generally may engage in political activities during unpaid time off, vacation, personal, or compensatory time off **unless your agency has stricter policies or applicable laws**.

It is important to review your agency's policies and applicable laws to see if you must comply with additional restrictions on political activities. For example, employees at some State agencies are prohibited from engaging in certain political activities even when they are off work and at home. If you are unsure about your agency's political activity policies, you should contact your Ethics Officer.

Prohibited Political Activity Provisions

Here are some examples of prohibited political activity ([see 5 ILCS 430/1-5](https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430)):

- Distributing or preparing to distribute political campaign materials.
- Soliciting votes on behalf of a political candidate or in support of (or against) a referendum.
- Making contributions to a political candidate or party.
- Preparing for, organizing, or participating in a political meeting or rally.

- Participating in or conducting a public opinion poll connected to a political organization or campaign for a political office.
- Managing or working on a campaign.

As a reminder, if you know of State employees engaging in prohibited political activities, or if other State employees are asking you to engage in prohibited political activities, you must report these violations to the OEIG and/or your agency Ethics Officer.

Additional Restrictions on Political Campaign Contributions

The Ethics Act also specifically prohibits State employees, political candidates, and lobbyists from intentionally soliciting, accepting, offering, or making political contributions *while on State property* ([see 5 ILCS 430/5-35](https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430)):

For purposes of this Section, "State property" means any building or portion thereof owned or exclusively leased by the State or any State agency at the time the contribution is solicited, offered, accepted, or made.

For example, this means it is illegal for a political candidate to come to your State office and ask you to donate to their campaign; this would be true even if the candidate is your coworker!

Additionally, you should note that it is illegal for State employees to solicit or receive campaign contributions from anyone that they inspect, license, investigate, or regulate.

This applies even when not on compensated time or on State property. This behavior is Solicitation Misconduct and is a crime under [the Illinois Criminal Code](#) ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Criminal%20Code%20of%202012.&ActID=1876&ChapterID=53&ChapAct=720+ILCS+5%2F&SeqStart=85500000&SeqEnd=86674999#:~:text=%C2%A)

Knowledge Check: Political Activity on State Property

Jamie is a new administrator at a State agency and is starting to get to know their colleagues. Jamie is invited to have dinner with their coworker, Finlay, at a restaurant a few blocks away from their State office. During dinner, Finlay mentions that they are an alderperson for a neighboring town and that they are up for reelection. Finlay also shares that there is a campaign event in the upcoming week and they would love to see Jamie there. Jamie enthusiastically accepts the invitation and marks it on their personal calendar.

The day of the campaign event comes, and Jamie plans to attend after work. As Jamie is leaving the office for the day, they get a call from their spouse about a situation that Jamie needs to help with. Jamie feels bad about not being able to attend the campaign event on such short notice. To make up for it, Jamie puts \$50 cash inside an envelope with a note that says, "Sorry I couldn't make it to your event, please add this to your campaign fund. I hope this makes up for it! - Jamie." As Jamie is walking out of the office, they slip the envelope under Finlay's office door.

Did Jamie engage in any type of prohibited political activity?

- A. No, Jamie talked to Finlay about campaign matters and gave a campaign contribution off State compensated time.
 - Choice A is incorrect. The Ethics Act specifically prohibits State employees, political candidates, and lobbyists from intentionally soliciting, accepting, offering, or making political contributions *while on State property* ([see 5 ILCS 430/5-35](https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430)). In this case, Jamie may have made a campaign contribution to Finlay off State time, however, it was given on State property, which violates the Ethics Act.
- B. Yes, State employees are prohibited from engaging in all types of political activity, even outside of State compensated time.

- Choice B is not the best choice because State employees generally may engage in political activities during vacation, personal, unpaid, or compensatory time off, **unless an agency has stricter policies or applicable laws**. In this scenario, there is no indication that Jamie was broadly restricted from engaging in political activity outside of State compensated time. In this case, Jamie may have made a campaign contribution to Finlay off State time; however, it was given on State property. The Ethics Act specifically prohibits State employees, political candidates, and lobbyists from intentionally soliciting, accepting, offering, or making political contributions *while on State property* (see **5 ILCS 430/5-35**) (<https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS430/5-35>)
- C. No, Jamie did not use State resources in making the campaign contribution.
- Choice C is incorrect. The Ethics Act specifically prohibits State employees, political candidates, and lobbyists from intentionally soliciting, accepting, offering, or making political contributions *while on State property* (see **5 ILCS 430/5-35**) (<https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS430/5-35>) In this case, Jamie may not have used State resources to make a campaign contribution to Finlay, however, Jamie made the campaign contribution on State property, which violates the Ethics Act
- D. Yes, Jamie gave a political campaign contribution on State property.
- Correct!** The Ethics Act specifically prohibits State employees, political candidates, and lobbyists from intentionally soliciting, accepting, offering, or making political contributions *while on State property* (see **5 ILCS 430/5-35**) (<https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS430/5-35>) In this case, Jamie gave a donation to Finlay's campaign on State property, in violation of the Ethics Act.

Prohibited Offer or Promise

The Ethics Act further prohibits you from offering or promising anything of value related to State government in exchange for a political contribution.

This is a prohibited offer or promise (see **5 ILCS 430/5-30**) (<https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS430/5-30>)

Offering anything of value might include promising:

- promotions, salary increases, or other employee benefits;
- favorable treatment in regulatory matters; or
- an award of public contracts.

Per the Ethics Act, if another State employee requests or directs you to engage in an activity that may be a prohibited offer or promise, you **must** report it to the OEIG and/or your Ethics Officer.

Public Service Announcements

Public service announcements issued by the State, including radio, newspaper, or television messages, or those displayed on a billboard or electronic message board, cannot contain the proper name, image, or voice of any executive branch constitutional officer or member of the General Assembly.

Furthermore, promotional items like bumper stickers, billboards, stickers, or other promotional items cannot use the proper name or image of any executive branch constitutional officer or member of the General Assembly when these items are not part of that official's public functions, and public funds are used for their creation, purchase, or distribution.

For more information on public service announcements, you can review **Section 5-20 of the Ethics Act** (<https://ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS430/5-20>)

Session 3: Highlights

No political activities during work or with work resources.

No political contributions during State time or on State property.

Nothing relating to State government can be offered or promised in exchange for a political contribution.

Session 4: Conflicts of Interest During and After State Employment

A conflict of interest occurs when a public employee's personal interests could compromise their judgment, decisions, or actions in the public workplace. One type of conflict of interest can also affect State employees' employment decisions after leaving State government-this is referred to as the Revolving Door prohibition or limitation. This session will review how to identify and manage conflicts of interest, the Revolving Door processes and procedures, and the required filing of Statements of Economic Interests.

Why is this important to you?

- Integrity in government services is vital to better governance and gaining public trust. Establishing this requires State actors to make decisions and conduct themselves with the State's needs in mind, not their personal interests. Although employees may not believe they have a conflict, even the appearance of such conflicts of interest can cause others to doubt the integrity of State decisions.
- Understanding Revolving Door provisions and how they apply to you helps you make informed decisions about post-State employment and avoid potential fines or restrictions.

Conflicts of Interest

State employees should review the conflict of interest-related laws, rules, and policies for their agencies to determine if the agency defines "conflict of interest" more broadly or requires State employees to provide notice to the agency of potential conflicts of interest or the appearance of one.

Examples of conflicts of interest that State employees should avoid include:

- influencing or making hiring decisions regarding family, friends, or associates;
- signing or making a recommendation on a State grant or contract with an entity in which the employee, or a friend, family member, or an associate, owns an interest;
- participating in a decision to grant or renew State licenses for friends or family; or

- holding secondary employment that conflicts with the employee's work for the State.

If you think you may have a real or apparent conflict of interest, you should disclose this information to your supervisor and/or Ethics Officer, who will typically need more information from you to determine whether a conflict, or an appearance of one, exists. The existence of a conflict or appearance of a conflict in and of itself does not mean that someone has done anything wrong. In fact, by identifying a potential conflict of interest, you are promoting integrity in State government.

For example, if you are an employee at an agency that awards grants, and your spouse is an executive in an organization that seeks such grants, you should disclose this potential conflict of interest to your supervisor and/or Ethics Officer. This could be remedied by your recusal from (i.e., not taking part in) any grant process involving your spouse's organization.

Another example is secondary employment. A second job can present a possible conflict of interest based on the type of secondary work you do or when you perform the secondary job. You should review your agency's secondary employment policies to ensure you understand your reporting obligations and provide detailed and updated information regarding your secondary employment so an appropriate review and decision can be made by the agency as to whether you can engage in secondary work.

More examples of conflict of interest violations can also be found in the following published founded reports:

- **OEIG Case No. 24-00353** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/24-00353-thomas-d--summary-report-redacted-final.pdf>): State employee was involved in awarding substantial and increased work to a vendor in which he had a financial interest.
- **OEIG Case No. 22-00458** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/22-00458-released-redacted-summary-report-omoniyi-07.24.23.pdf>): State employee was involved with regulatory decisions involving a company for which he was acting as General Counsel and receiving compensation.
- **OEIG Case No. 22-02192** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/22-02192-nance-released-redacted-summary-report-5-21-24.pdf>): Contractual State employee accepted secondary employment with State agency grantees while being contractually employed by a State agency. The work for the grantees was directly related to the employee's prior work as a full-time State employee, and grants were paid by the employee's division within the agency.

Knowledge Check: Conflict of Interest

Zec is a licensing representative for a State agency that audits and determines licensing certifications for facilities across Illinois. Zec has conducted audits for the same facilities over the last 10 years and has developed great working relationships with those entities. One of the facilities that Zec audits recently upgraded their systems and offered Zec a consulting position with a three-month contract. The position would focus on how to best organize the facility's operations systems to ensure compliance and that audits run smoothly. The facility assures Zec that they can perform the work at night and on weekends.

What action(s) should Zec take regarding this secondary employment opportunity?

- A. Zec is not required to report the employment opportunity to their agency because they will be conducting the work on their own time, after State hours.
 - Choice A is incorrect. Most agencies require employees to obtain agency approval prior to accepting outside/secondary employment or compensation. It would also be unlikely that Zec would be approved to engage in secondary employment with the facility in question while Zec is responsible for auditing this entity, as it would likely be considered a conflict of interest.
- B. Since Zec would only be working part-time at the facility, this is not considered secondary employment, and Zec does not need to inform the State agency.
 - Choice B is incorrect. Regardless of whether it is full-time or part-time work, Zec would need to notify and consult with their supervisor and/or Ethics Officer as directed by the agency's conflict of interest policies, as well as their secondary employment approval process.
- C. Zec should notify the agency about this opportunity prior to accepting the job.
 - **Correct!** The agency would likely consider it a conflict of interest for Zec to work for the facility based on Zec's current State duties.
- D. Zec may not accept the employment under any circumstances because it is prohibited for licensing representatives to have secondary employment.
 - Choice D is not the best choice because Zec would need to review the agency's secondary employment policies and consult with their supervisor and/or Ethics Officer regarding the potential or perceived conflict of interest.

Conflicts of Interest

There are other laws regarding conflicts of interest. For example:

- **Illinois Procurement Code Section 50-50** (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248>) makes it unlawful to use confidential information gained by virtue of State employment to benefit yourself or any other person.
- **Section 50-13 of the Illinois Procurement Code** (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248>) and **Section 3A-35 of the Illinois Governmental Ethics Act** (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=Illinois%20Governmental%20Ethics%20Act.&ActID=129&ChapterID=2&ChapAct=5+ILCS+420%2F&SeqStart=21300000&SeqEnd=248>) also make it unlawful for certain State employees, as well as their family members and business associates, at times, from acquiring interests in State contracts.
- In most cases, individuals who have certain types of financial interests in State contracts or are registered lobbyists cannot hold positions on State boards or commissions. This prohibition sometimes extends to family members too.

For more information on these restrictions, you can review the following links:

- **the Ethics Act, 5 ILCS 430/5-55** (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430%2F&SeqStart=21300000&SeqEnd=248>) and
- **the Lobbyist Registration Act, 25 ILCS 170/3.1** ([https://ilga.gov/Legislation/ILCS/Articles?ActID=465&ChapterID=6#:~:text=%C2%A0%C2%A0%C2%A0%C2%A0\(25%20ILCS%20170%2F3.1\).](https://ilga.gov/Legislation/ILCS/Articles?ActID=465&ChapterID=6#:~:text=%C2%A0%C2%A0%C2%A0%C2%A0(25%20ILCS%20170%2F3.1).))

Conflicts of interest can be complicated. You should contact your Ethics Officer if you have questions.

Revolving Door Prohibition

In your role as a State employee, your decision-making should be in the best interest of the State and not your personal interests. To help ensure this, the **Revolving Door provisions of the Ethics Act** (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430>) require that if, as a State employee, you participated **personally and substantially** in:

- the award or fiscal administration of State contracts or change orders cumulatively totaling \$25,000 or more, or
- the making of a regulatory or licensing decision

for a non-State entity, in the **one year prior** to leaving State employment, you cannot accept employment or compensation from that entity **for one year after** the termination of your State employment.

This prohibition also applies to spouses and immediate family members living with you.

Revolving Door - Factors to Consider

Was a Contracting, Regulating, or Licensing Decision Involved?

- State contracts or change orders have to cumulatively total \$25,000 or more during the past year to be counted towards the Revolving Door prohibition.
 - The EEC has considered grants to be contracts for purposes of the Revolving Door provisions.
 - "Regulatory" means "relating to the control or direction of an activity by a set of rules, laws, etc.," as discussed in EEC Decision [21-EEC-005](https://oeig.illinois.gov/content/dam/soi/en/web/oeig/pdf/21eec005javaraj.pdf) (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/pdf/21eec005javaraj.pdf>).
 - Common regulatory activities include audits, inspections, granting of permits, or adjudications.
-

Revolving Door - Factors to Consider

Were you personally and substantially involved?

- According to EEC Decision [23-EEC-001](https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/eec-decisions/23EEC001%20Fayant.pdf) (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/eec-decisions/23EEC001%20Fayant.pdf>), "substantial involvement" means "the involvement is of significance to the matter and can occur when, for example, the employee participates through the making of recommendations, investigating, or rendering advice."
 - This usually involves some exercise of discretion; the employee is not required to be the final decision-maker for the participation to be considered "substantial."
-

Revolving Door Provisions - Other Factors to Consider

How to determine the one-year period?

These provisions don't mean you can never accept employment from these entities, but you cannot do so for **one year after** you leave State employment, if you were personally and substantially involved in the award, decision, or fiscal administration in the **one year prior** to leaving State employment. This one year is sometimes referred to as a "cooling-off" period.

Revolving Door Provisions - The "c-list"

"C-list" positions are positions that have been specifically identified by your agency as positions in which employees may be personally and substantially involved in the award or fiscal administration of State contracts, or in regulatory or licensing decisions, as part of their job duties.

If you are in a "c-list" position, you **must** notify the OEIG when you want to accept an offer of compensation or employment from a non-State employer for the OEIG to make a determination. You must seek a Revolving Door determination with the OEIG **before** you accept any offer throughout the one year after leaving State employment.

Your agency should notify you in writing that you are in a "c-list" position.

Revolving Door Provisions - OEIG Determination and Appeal Process

State employees seeking a Revolving Door determination must submit the appropriate paperwork to the OEIG. There are two forms required for this process: the RD-101 (completed by the departing employee) and the RD-102 (completed by the Ethics Officer) and an optional form, the RD-103 (completed by the prospective employer). Those forms, along with answers to frequently asked questions about the Revolving Door process, are available on the [Revolving Door section of the OEIG website](https://oeig.illinois.gov/revolving-door/revolving-door-instructions.html) (<https://oeig.illinois.gov/revolving-door/revolving-door-instructions.html>).

Within 10 calendar days of receiving both the RD-101 and RD-102 forms, the OEIG will determine whether you are restricted from accepting the offer and notify you of its determination. If you disagree with the determination, you can appeal to the EEC within 10 calendar days from the date of the determination. The Attorney General can also appeal the OEIG's determination. The EEC must then issue its decision within 10 calendar days after an appeal. If there is no appeal within the allotted time frame, the OEIG's determination is then final.



Knowledge Check: Revolving Door

After 28 years of working as an Engineer for a State agency, Georgia is considering retirement and sends a letter to local engineering firms inquiring about non-State opportunities. Georgia is on the "c-list" for her State agency. She engages in informal discussions with three firms and ultimately narrows it down to working with one of the firms. When Georgia fills out her Revolving Door Notification of Offer (RD-101) form, she anticipates her retirement date to be December 31, 2025, and lists this date as her end of State employment date on the form. Georgia submits her paperwork and receives a not restricted determination from the OEIG on November 15, 2025. As the end of the year approaches, Georgia's department is understaffed, and she is asked to delay her retirement. Georgia agrees, and her final day with the State is February 1, 2026.

Until what date must Georgia submit RD-101 forms for any new job offers she receives?

- A. She already submitted her RD-101, so she doesn't need to submit any more RD forms to the OEIG.
 - Choice A is incorrect. Employees subject to the "c-list" provisions of the Revolving Door statute must submit an RD-101 form for **each** job they intend to accept for a period of one year following their termination of State employment.
- B. December 31, 2026.
 - Choice B is incorrect. Georgia must notify the OEIG of any new job offers she receives for a period of one year, which begins immediately after termination of State employment. Initially, Georgia's termination date was planned for December 31, 2025, but it was extended to February 1, 2026, thus also extending the one-year reporting period.
- C. November 15, 2026.
 - Choice C is incorrect. The date that the OEIG issued a Revolving Door determination is irrelevant for purposes of determining the one-year period that a former State employee must notify the OEIG of any new job offers. The one-year period starts immediately after termination of State employment, which was on February 1, 2026, not when the OEIG issued its determination.
- D. Until February 1, 2027.
 - **Correct!** Georgia must notify the OEIG of any new job offers she receives for a period of one year after termination of State employment. Georgia did not leave State employment until February 1, 2026, and so she must notify the OEIG for one year following this date.

The "h-list"

There are also employees in positions listed in subsection "h" of [Section 5-45 of the Ethics Act](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430(h),-The%20following%20officers) ([https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430\(h\),-The%20following%20officers](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430(h),-The%20following%20officers)) that are prohibited from accepting employment, compensation, or fees from a non-State entity regardless of whether the "h-list" State employee was personally or substantially involved in a regulatory or licensing decision, or a contract award or the fiscal administration of contracts cumulatively worth \$25,000 or more, with the non-State entity.

These broader Revolving Door restrictions apply to certain high-ranking positions, as well as certain positions involved in procurement, and to all employees of the Illinois Racing and Gaming Boards.

Because employees on the "h-list" are strictly prohibited regardless of their participation, the OEIG does **not** make "h-list" Revolving Door determinations. "H-list" employees should contact their Ethics Officer for guidance prior to accepting post-State employment.

Special Two-Year Ethics Act Revolving Door Restrictions

Employees of the *Illinois Gaming Board* and the *Illinois Racing Board* generally may not hold an ownership interest in a gaming license issued under Illinois law for two years after leaving State employment. This two-year prohibition extends to employees' spouses and immediate family members living with them. [Section 5-45\(a-5\)](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430(a%2D5),-No%20officer%2C%20member) ([https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430\(a%2D5\),-No%20officer%2C%20member](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430(a%2D5),-No%20officer%2C%20member)).

Similarly, State employees *working at a State agency that regulates cannabis business licenses*, and who participated personally and substantially in the award of such licenses, generally may not hold an ownership interest in a cannabis license during State employment or for two years after leaving State employment. This two-year prohibition also extends to employees' spouses and immediate family members living with them. [Section 5-45\(a-10\)](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430(a%2D10),-This%20subsection%20(a)) ([https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430\(a%2D10\),-This%20subsection%20\(a\)](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430(a%2D10),-This%20subsection%20(a))).

Revolving Door Consequences

Violating the Revolving Door prohibitions may carry substantial potential penalties under the Ethics Act.

The EEC may issue fines **up to three times** the compensation a State employee received or would have received in violation of the Ethics Act's Revolving Door prohibitions. For example, the following fines have been imposed by the EEC for Revolving Door violations:

- **\$193,689.60 fine - EEC Decision 20-EEC-001** (<https://eec.illinois.gov/content/dam/soi/en/web/eec/disciplinary-decisions-list/wons-published-decision.pdf>).
- **\$154,056.10 fine - EEC Decision 17-EEC-003** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/eec-decisions/17eec003-doyle-5-0.pdf>).
- **\$100,000 fine - EEC Decision 24-EEC-002** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/eec-decisions/24EEC002%20Bender.pdf>).

"C-list" employees may also face a fine of up to \$5,000 issued by the EEC if they fail to notify the OEIG of a job offer and seek a determination *prior* to accepting that job. The EEC may impose this fine even if the underlying job offer would not have violated the Revolving Door prohibitions.

The OEIG website provides a variety of resources, including Revolving Door instructions and **forms** (<https://oeig.illinois.gov/revolving-door/revolving-door-instructions.html>), **FAQs** (<https://oeig.illinois.gov/revolving-door/revolving-door-faqs.html>), and **EEC decisions** (<https://oeig.illinois.gov/revolving-door/revolving-door-decisions.html>), available for your review to help assist in your understanding of Revolving Door provisions.

Additional Post-Employment Restrictions

There are a few final post-employment restrictions you should be aware of.

Under **Section 50-30 of the Illinois Procurement Code** (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000>),

certain State employees cannot participate in procurement-related activities on behalf of a non-State employer that relate to the State agency the individual worked for most recently for **two years** after leaving the State agency.

Section 50-15 of the Illinois Procurement Code (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000>)

also prohibits a State employee who has a contract for future employment, or is negotiating possible future employment, with a vendor from representing the State in any contract negotiations with that vendor.

Lastly, **Executive Order 15-09** (<https://www.illinois.gov/government/executive-orders/executive-order-executive-order-number-9.2015.html>), prohibits State employees under the Governor's jurisdiction from:

- negotiating for post-State employment with any entity that lobbies that employee's agency while they are still employed by the State; and
- being paid to lobby any State executive agency for **one year** after the employee leaves their State position.

Knowledge Check: Revolving Door

Madison is a State agency Chief of Staff, which is an "h-list position." Madison is out to lunch with her friend from law school, Austin. Austin shares that his law firm (ABC) is looking to hire a new attorney, and he would love to recommend Madison for the role. Madison is excited about the opportunity but believes her State agency contracted with the law firm in the past. The next day, Madison speaks to her Ethics Officer, who shares that the State agency awarded an emergency contract for legal services to Austin's law firm in the early stages of the COVID-19 pandemic. After the contract expired in 2022, the State agency applied for and received federal grant funding for pro-bono legal services which it then awarded to local law firms. ABC was one of the four firms that received a \$250,000 grant from Madison's State agency on August 1, 2025. The Ethics Officer also shared with Madison that the ABC contract and grant were handled by a division that did not fall under Madison's direct oversight.

Can Madison leave her State agency position, accept an offer with ABC, and start on January 1, 2026?

- A. Yes, because Madison is only prohibited from accepting employment with agencies that contracted with her State agency in her last year of State employment and ABC's contract was awarded over a year ago. The more recent grant is not covered by the Revolving Door prohibition.
 - Please try again. While true that the ABC contract was awarded in 2022, which is over a year ago, ABC also received a grant from Madison's State agency within her last year of State employment. A grant agreement is a contract and for this reason Madison would be prohibited from accepting the offer with ABC.
- B. No, because ABC was awarded a grant by Madison's State agency in Madison's last year of State employment.
 - **Correct!** Employees subject to the "h-list" provisions of the Revolving Door statute are prohibited from accepting employment with an employer that was a party to a State contract involving the State employee's State agency regardless of whether the employee participated in the award of the State contract. In Madison's last year, ABC was awarded a grant, and a grant agreement is a contract.
- C. Yes, because the ABC contract and grant were not under Madison's oversight.
 - Please try again. "H-list" employees are prohibited from accepting employment with an employer that was a party to a State contract involving the employee's State agency regardless of whether the employee participated in the award of the State contract. This means that Madison would be restricted from an employment opportunity regardless of her lack of oversight or participation with a contract or grant.
- D. No, as an "h-list" employee, Madison is prohibited from working for any organization that has ever received funding from her State agency.
 - Please try again. An "h-list" employee would not be barred from working with all organizations that have ever had contracts involving their State agency. "H-list" employees are prohibited for one year from working for organizations that had contracts involving their State agency in only their last year of State employment.

Statements of Economic Interests

Certain State employees must file annual Statements of Economic Interests with the Illinois Secretary of State. These statements require disclosure of certain financial interests and relationships that State employees may have that could create a conflict of interest, or the appearance of a conflict of interest, based on the employees' duties.

The Secretary of State will notify you no later than April 1 of each year if you need to submit a Statement of Economic Interests. The Statement of Economic Interests may be filed electronically after you receive a notice with login information from the Secretary of State. Visit the **Secretary of State's website** (https://www.isos.gov/departments/index/economic_interests/soeguidance.html) for guidance on completing these forms.

Your Ethics Officer must review the statement prior to its final submission to the Secretary of State before the **May 1 filing deadline**.

Statements of Economic Interests (continued)

If you are required to file a Statement of Economic Interests with the Secretary of State, then you must also answer four supplemental questions from the EEC in a form called a Supplemental Statement of Economic Interest. These questions cover property ownership, non-governmental positions you might hold, litigation you might have with the State, and relatives you have who serve in State government. The EEC will notify you of this responsibility and provide you with login information to file your Supplemental Statement of Economic Interest electronically with the EEC. You may review the supplemental form and other related information on the [EEC's website](https://eec.illinois.gov/executive-order.html) (<https://eec.illinois.gov/executive-order.html>).

If you have a question about Statements of Economic Interests, you may seek the advice of your Ethics Officer and review any guidance that may be available on the [Secretary of State's website](https://www.ilsos.gov/departments/index/economic_interests/) (https://www.ilsos.gov/departments/index/economic_interests/). You should also be aware that **if you willfully file a false or incomplete statement, you may be guilty of a Class A misdemeanor**; however, if you complete your statement in reasonable, good faith reliance on guidance provided to you by your Ethics Officer, it shall not constitute a willful false or incomplete statement.

For further information on Statements of Economic Interests and Supplemental Statements of Economic Interest, **see 5 ILCS 420/4A**

([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Illinois%20Governmental%20Ethics%20Act.&ActID=129&ChapterID=2&ChapAct=5+ILCS+420%2F&SeqStart=5750000&SeqEnd=6700000)

[MajorTopic=&Chapter=&ActName=Illinois%20Governmental%20Ethics%20Act.&ActID=129&ChapterID=2&ChapAct=5+ILCS+420%2F&SeqStart=5750000&SeqEnd=6700000](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Illinois%20Governmental%20Ethics%20Act.&ActID=129&ChapterID=2&ChapAct=5+ILCS+420%2F&SeqStart=5750000&SeqEnd=6700000)).

and **Executive Order 15-09** (<https://www.illinois.gov/government/executive-orders/executive-order-executive-order-number-9-2015.html>).

Session 4: Highlights

Identify and Avoid Conflicts of Interest.

Know your Revolving Door obligations.

Employees required to file Statements of Economic Interests must do so annually by May 1st.

Session 5: Procurement and Ex Parte Communications

This session gives an overview of rules you must follow to ensure transparency in procurement and official administrative decision-making processes. The procedures regarding memorializing procurement communication, protecting the procurement process, and ex parte communications are integral to ensuring integrity, transparency, and oversight.

Protecting the Procurement Process

State employees have a duty to protect the integrity of the procurement process.

If you suspect parties (including other State employees) are colluding or engaging in any anticompetitive practices, you *must* report such suspicions to the OEIG, the Office of the Attorney General, and the Chief Procurement Officer (**30 ILCS 500/50-40** ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000)

[MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000)

You should also know that certain State employees who willfully use information from procurement matters to gain an advantage or otherwise negatively affect the fairness or integrity of the process could lose their jobs and face criminal prosecution (**30 ILCS 500/50-45**

([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000)

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What is Procurement?

In this training, "procurement" refers to the process of purchasing a wide range of goods and services the State of Illinois needs to ensure vital government functions are fulfilled. Since the State of Illinois uses public funds to acquire these goods and services, the public has a vested interest in accessing the communications related to the State of Illinois' procurement operations and decisions.

Memorializing Procurement Communications

A State employee who participates in contract award decisions may receive communications about an active procurement matter. Certain communications about active procurement matters may need to be "memorialized," or in other words, reported. This applies to:

Contract Awards

Change Orders

Renewals

Extensions

Depending on the procurement matter, other relevant laws may require the employee to document the communications in other ways. If you work in procurement, you should be familiar with the procurement communications reporting provisions of the Illinois Procurement Code. For additional information, you should review **30 ILCS 500/50-39** ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000)

[MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000)

50-40 ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000)

[MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000)

and **50-45** ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=FINANCE&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=248000)

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You should also review relevant administrative regulations at: 2 Ill. Admin. Code, Sections **1620.825**

(<https://www.ilga.gov/commission/jcar/admincode/002/002016200H08250R.html>), **1620.826**

(<https://www.ilga.gov/commission/jcar/admincode/002/002016200H08260R.html>), and **3002.1400**

(<https://www.ilga.gov/commission/jcar/admincode/002/002030020014000R.html>).

When to Report Procurement Communications

If you work in procurement and receive a communication about an active procurement matter, you may have to report that communication to the Procurement Policy Board. Specifically, the Illinois Procurement Code (**Section 50-39** ([https://www.ilga.gov/legislation/ILCS/details?](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=24800000#:~:text=%C2%A0)

[MajorTopic=&Chapter=&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=24800000#:~:text=%C2%A0](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=24800000#:~:text=%C2%A0)

says that certain employees shall report procurement-related communications that:

- impart or request material information regarding a procurement matter (these things might include price, quantity, terms of payment, performance terms, or other terms of a contract);
- involve a potential procurement action;
- relate to a currently active matter; AND
- are not privileged, confidential, or otherwise protected from disclosure.

If you have an exchange about a material communication with a registered lobbyist, the [Illinois Administrative Code](https://www.ilga.gov/commission/jcar/admincode/002/002030020014000R.html) (<https://www.ilga.gov/commission/jcar/admincode/002/002030020014000R.html>), requires that you make every attempt to get a written statement from that lobbyist about the communication that took place. You should still prepare a report for the communication and file it with the Illinois Procurement Policy Board. If the lobbyist fails to provide you with a written statement within 30 days, you must file your own report and include information about your attempted requests to get the lobbyist to report the communication.

How to Report Procurement Communications

You could receive a procurement communication via phone call, email, written letter, text message, or in-person communication. Regardless of how you receive it, you **must** document and report the communication, including:

- the name(s), job title(s), and location(s) of each person that made and received the communication;
- the identity of the individual or entity represented by the person making the communication;
- the date, time, and duration of each communication;
- the communication method (including phone numbers, if applicable); and
- a detailed summary of the communication, including any actions requested or recommended, and any responses given.

The [Procurement Policy Board website](https://ppb.illinois.gov/) (<https://ppb.illinois.gov/>), allows you to report procurement-related communications online. Please be aware that [reporting requirements for procurement communications](https://www.ilga.gov/commission/jcar/admincode/002/002030020014000R.html) (<https://www.ilga.gov/commission/jcar/admincode/002/002030020014000R.html>), may vary depending on the type of communication.

Exceptions to Reporting Procurement Communications

You might be wondering about those very brief communications you sometimes receive, like when you get a short phone call to confirm how many copies of a document a party must submit. There are some exceptions under the [Illinois Procurement Code](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=24800000#:~:text=%C2%A0) (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=Illinois%20Procurement%20Code.&ActID=532&ChapterID=7&ChapAct=30+ILCS+500%2F&SeqStart=21300000&SeqEnd=24800000#:~:text=%C2%A0>) to the reporting requirement for certain communications.

For example, you do not have to report communications about procedural steps in the procurement process; communications that are privileged, protected, or confidential; or communications made in a public forum ([see 30 ILCS 500/50-39](#)).

Ex Parte Communications in State Decision-making

First, what is an ex parte communication? It is any written or oral communication that imparts or requests material information or makes a material argument about a potential action being considered before certain State agencies that make regulatory, quasi-judicial, investment, or licensing decisions ([see 5 ILCS 430/5-50](https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430)) (<https://www.ilga.gov/legislation/ILCS/details?MajorTopic=GOVERNMENT&Chapter=GENERAL%20PROVISIONS&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430>).

including, for example, the Illinois Commerce Commission, the Prisoner Review Board, the Civil Service Commission, and the Department of Insurance.

However, general statements about matters of procedure and practice, and statements made in a public forum, are not considered to be ex parte communications.

If you receive an ex parte communication from **an interested party**, you must promptly memorialize that communication and make it part of the record. An "interested party" is anyone whose rights, privileges, or interests are the subject of, or are directly affected by, a regulatory, quasi-judicial, investment, or licensing matter.

Alternately, if you receive an ex parte communication about a pending matter from anyone who is **not an interested party to that matter**, you *must* report it immediately to your Ethics Officer, who shall ensure the communication is made part of the record **AND reported to the EEC**.

Knowledge Check: Procurement Communications

Ripley works for a State agency that is in the middle of an active procurement matter and is accepting bids for cellular network services. Ripley is a member of the evaluation committee and will participate in selecting the new vendor from the submitted bids.

Yesterday, Burke from the Weyland-Yutani Corporation called Ripley to follow up on Weyland-Yutani's bid. During this call, Burke explained to Ripley that Weyland-Yutani has better coverage than any other bidder and further elaborated on why the performance and payment terms offered in their bid must be better than those offered by their competitors. A few hours later, Milton with Initech, another bidder on the cellular network service contract, calls Ripley to ask how many copies of Initech's bid package must be submitted.

The next day, Ripley tells the agency Ethics Officer about the two calls received the previous day.

What should the Ethics Officer tell Ripley?

- A. Both calls need to be reported to the Procurement Policy Board.
 - Choice A is not the best response because conversations regarding matters of procedure and practice, or non-material questions seeking clarification, are not considered procurement communications that need to be reported under the Illinois Procurement Code. Thus, Milton's call does not need to be memorialized or disclosed to the Procurement Policy Board. However, Burke's call imparted material information about a bid—namely, the allegedly superior coverage and terms offered by Weyland-Yutani—and thus must be reported to the Procurement Policy Board. As this may be a confusing topic, it is always best to consult your Ethics Officer if you are unsure about whether a conversation needs to be documented as a procurement or ex parte communication.

- B. Only Milton's call needs to be reported.
 - Choice B is incorrect. Burke's call imparted material information about a bid-namely, the allegedly superior coverage and terms offered by Weyland-Yutani-and thus must be reported to the Procurement Policy Board. Under the statute, however, conversations regarding matters of procedure and practice, or non-material questions seeking clarification, are not considered procurement communications that need to be reported. Thus, Milton's call does not need to be memorialized or disclosed to the Procurement Policy Board.
- C. Only Burke's call needs to be reported.
 - **Correct!** Burke's call imparts material information about a bid-namely, the allegedly superior coverage and terms offered by Weyland-Yutani-and thus must be reported to the Procurement Policy Board. Under the statute, however, conversations regarding matters of procedure and practice, or non-material questions seeking clarification, are not considered procurement communications that require reporting. Thus, Milton's call does not need to be memorialized or disclosed to the Procurement Policy Board. However, as this may be a confusing topic, it is always best to consult your Ethics Officer if you are unsure about whether a communication needs to be documented as a procurement or ex parte communication.
- D. Neither call needs to be reported, as both vendor contacts were verbal conversations, and not made in writing.
 - Choice D is incorrect. Regardless of the manner in which it was received, Burke's call imparted material information about a bid-namely, the allegedly superior coverage and terms offered by Weyland-Yutani-and thus must be reported to the Procurement Policy Board. Under the statute, however, conversations regarding matters of procedure and practice, or non-material questions seeking clarification, are not considered procurement communications that need to be reported. Thus, Milton's call does not need to be memorialized or disclosed to the Procurement Policy Board. However, as this may be a confusing topic, it is always best to consult your Ethics Officer if you are unsure about whether a communication needs to be documented as a procurement or ex parte communication.

Session 5: Highlights

Certain procurement communications have to be reported to the Procurement Policy Board.

Certain ex parte communications must be promptly memorialized and recorded.

Suspicious of parties colluding or engaging in any anticompetitive practices must be reported to the OEIG, the Office of the Attorney General, and the Chief Procurement Officer.

Session 6: Proper Hiring and Employee Documentation

This session will review some of the duties State employees have in the hiring process, as well as an employee's duty to provide truthful statements and documentation throughout their employment.

Why is this important to you?

- All job candidates should have a fair chance at State employment, no matter who knows whom.
- False statements in hiring applications or work documents, including timekeeping documents, reduce public trust in government and competitiveness in hiring.
- It is important to be part of the solution, and not part of the problem.

Ethical Hiring Practices

Various laws and judicial decisions require State agencies to designate and fill most positions through an objective and merit-based selection process. These positions have many names, such as "covered," "job-protected," "non-exempt," "personnel code-protected," or "*Rutan*-covered" positions. This training refers to these positions as "job-protected."

Agencies must post and fill job-protected positions according to a competitive selection process. An agency cannot consider an applicant's political affiliation or support when making a hiring decision for a job-protected position.

The OEIG's Hiring & Employment Monitoring (HEM) Division conducts compliance-based reviews of hiring and employment decisions made by State agencies. HEM ensures compliance with the State's **Comprehensive Employment Plan (CEP)** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/hem/documents/amended-cep-eff-7-15-2021.pdf>), provisions and makes recommendations to agencies when changes are needed via advisories. HEM also reports on its work by issuing quarterly and annual reports that are available on the **OEIG website** (<https://oeig.illinois.gov/hem.html>).

Ethical Hiring Practices

Certain principles of ethical hiring apply to all agencies, boards, and commissions under the Governor's jurisdiction for hiring into job-protected positions. A few of the principles include:

- Each position with the State has verifiable, objective minimum qualifications that agencies must include in the official position description and must directly relate to the duties and responsibilities of that position.
- Before an agency posts a vacant position, it must review the position description and update it, if necessary, to ensure the description accurately reflects the current position duties, responsibilities, and requirements.
- Agencies cannot consider and must certify there were no improper political reasons or factors for any hiring or employment action, including promotions.
- State employees who participate in the interview process must do so without any apparent or actual conflict of interest and are required to fill out a conflict of interest form identifying any existing personal or professional relationships with all applicants.

Ethical Hiring Practices - Political Contact Reporting

The CEP requires that you report any contact from, or on behalf of, an elected or appointed political official regarding a hiring or employment action for a job-protected position within 48 hours of receipt. This includes unsolicited contact directed to any personnel involved in the hiring or employment action, as well as contact made with employees who do not work within human resources, such as legislative affairs staff.

If you receive a political contact, or have reason to believe one has occurred, you must report it within 48 hours to the:

- CMS Political Contact Reporting Portal and/or

- HEM at OEIG.HEM@illinois.gov (mailto:oeig_hem@illinois.gov).

Knowledge Check: Political Contacts

Lauren is working on a hiring sequence for a job-protected position and is responsible for determining whether applicants meet the position's preferred qualifications. One of the preferred qualifications is for two years of experience working with a specific type of software. Applicants who meet this qualification receive 30 application points. While reviewing applications, Lauren sees that Applicant 10 has only six months of experience using the software rather than the two years specified in the preferred qualification. As such, Lauren deducts the full 30 points from Applicant 10's validated application score and emails Applicant 10 stating he has not been selected to interview for the position.

Two days later, the agency HR Director receives a call from the Executive Assistant to an Alderwoman. The Executive Assistant says that she is calling on behalf of the Alderwoman and states that Applicant 10 volunteered for the Alderwoman's campaign the year before, and the Alderwoman was impressed with Applicant 10's work. The Executive Assistant further states that the Alderwoman believes the agency has made a mistake by not inviting Applicant 10 to interview for the position and should reconsider this decision. Finally, the Executive Assistant relays that the Alderwoman would be happy to further discuss Applicant 10's merits with the HR Director at an expensive steakhouse downtown.

What should the HR Director do?

- A. The HR Director should tell the Executive Assistant that she cannot discuss the hiring sequence for a non-exempt position with the Executive Assistant or the Alderwoman and that the information the Executive Assistant shared about Applicant 10 will not be considered.
 - Choice A is not the best choice. While it is appropriate for the HR Director to respond in this way, the HR Director is also required to report the conversation to CMS and/or OEIG-HEM within 48 hours of the occurrence, per the CEP.
- B. The HR Director should go to the steakhouse to hear what the Alderwoman has to say about Applicant 10.
 - Choice B is incorrect. Under the CEP, a recipient of a contact from, or on behalf of, an elected or appointed political official regarding a hiring action for a job-protected position must report the contact to CMS and/or OEIG-HEM within 48 hours of the occurrence. In addition, accepting a possibly expensive dinner from a politician trying to influence the HR Director's official actions may even amount to accepting a bribe, depending on the circumstances.
- C. The HR Director should tell the Executive Assistant that she cannot discuss the hiring sequence for a non-exempt position with the Executive Assistant or the Alderwoman and report the conversation to CMS and/or OEIG-HEM.
 - **Correct!** Under the CEP, a recipient of a contact from an elected or appointed political official regarding a hiring action for a job-protected position must report the contact to CMS and/or OEIG-HEM within 48 hours of the occurrence. In addition, a best practice would be to communicate to the Executive Assistant and Alderwoman that this hiring sequence cannot be discussed. The HR Director also should not reconsider Applicant 10's qualifications.

Truthful Oral and Written Statements

It is essential to the operation of good government that statements you make as a part of your work for the State of Illinois be truthful. Every day, Illinois citizens rely on the integrity of State employee statements. Failure to make truthful statements could violate agency policies or State law, and could subject you to discipline or termination ([see State of Illinois Code of Personal Conduct](https://cms.illinois.gov/content/dam/soi/en/web/cms/personnel/employeeresources/documents/soi-code-personal-conduct.pdf) (<https://cms.illinois.gov/content/dam/soi/en/web/cms/personnel/employeeresources/documents/soi-code-personal-conduct.pdf>)).

Links to examples of relevant OEIG founded reports are available below:

- **OEIG Case No. 22-00077A** (<https://eec.illinois.gov/content/dam/soi/en/web/eec/eig-summary-reports/09-17-24-johnson-22-00077a-released-redacted-summary-report.pdf>): Employee was terminated for knowingly providing false information and making misrepresentations on employment applications.
- **OEIG Case No. 20-01184** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/09-14-2022-nimrick-20-01184-released-redacted-summary-report.pdf>): An employee was ultimately suspended for 20 days for providing false information and making misrepresentations on State promotional applications.

Further, the OEIG's website contains published reports about State employees who were terminated from their State jobs (or resigned in lieu of termination) for completing and/or submitting federal loan applications with false secondary employment information. These reports revealed instances where employees falsely reported on their agency's secondary employment forms that they had no secondary employment. For further information, visit the [Investigations section of the OEIG's website](https://oeig.illinois.gov/investigations/published-oeig-cases.html) (<https://oeig.illinois.gov/investigations/published-oeig-cases.html>).

Documenting Your Time Worked

Pursuant to the Ethics Act, [5 ILCS 430/5-5](https://ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430%2F&SeqStart=500000&SeqEnd=19000) (<https://ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430%2F&SeqStart=500000&SeqEnd=19000>).

State agencies must have policies obligating you to accurately report the time you spend on State business each day. The Ethics Act requires all State employees to:

- submit time reports
- ensure their time reports are accurate
- report the time spent on State business to the nearest quarter hour

Remember, you should accurately report the time you spend on State business, even if it falls outside of your regularly scheduled work hours.

Managing Working from Home and Secondary Employment

Some agencies permit certain employees to work from home. Typically, working from home is a privilege and it is imperative that this privilege not be abused. It is important to manage time outside of your agency's office environment in the same manner you would if you were in the office. If you work from home, you are still obligated to follow all applicable laws, rules, and policies.

Additionally, if you have any approved secondary employment, you should **not** perform tasks for that secondary job during your State job hours, even if you complete your State-employment related tasks in a timely manner. Secondary employment must be disclosed and approved through your agency processes.

Whether working from home or at the office, you must still accurately record the time you spend on State business. Examples of violations of secondary employment policies can be found in these published OEIG reports:

- **OEIG Case No. 23-02793** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/23-02793-parish-released-redacted-summary-report.pdf>): State employee violated agency policy by misusing time and resources to perform work for their outside businesses.
- **OEIG Case No. 21-02272** (<https://oeig.illinois.gov/content/dam/soi/en/web/oeig/investigations/documents/investigative-reports/21-02272-purchase-released-redacted-summary-report.pdf>): State employee violated agency policy and abused time by conducting secondary employment (by attending meetings and participating in phone calls for it) on State time.

Knowledge Check: Documentation of Time Worked

Emilio has a hybrid position with the State, working in the office three days per week and working from home two days per week. Emilio has certain work functions he is able to perform while working from home as long as he brings home the right equipment and materials, which is an expectation he agreed to when he started in his position. One day when he is supposed to be working from home, Emilio realizes he does not have what he needs to be able to conduct his work. Emilio knows he can complete the work during the rest of the week, so he doesn't notify anyone of his absence and takes the day off. However, he still reports having worked the full day on his timesheet and gets paid for the full day.

Did Emilio violate his timekeeping responsibilities?

- A. No, because Emilio could not perform his duties that day and should not be penalized.
 - Choice A is incorrect. According to the Ethics Act, State agencies must have policies requiring their employees to periodically submit timesheets documenting the time spent each day on official State business to the nearest quarter hour. In this case, Emilio could not perform his duties but still reported working a full day when he actually did not. Thus, Emilio violated his timekeeping responsibilities and falsified official records, which is also a violation of the State of Illinois Code of Personal Conduct.
- B. No, because Emilio will be able to complete all of his work during the same work week, so he should get paid for the work completed regardless of when he completed it.
 - Choice B is incorrect. According to the Ethics Act, State agencies must have policies requiring their employees to periodically submit timesheets documenting the time spent each day on official State business to the nearest quarter hour. Here, Emilio falsely claimed on timesheets that he worked on a day when he did not, thus violating his timekeeping responsibilities and falsifying official records, which is also a violation of the State of Illinois Code of Personal Conduct. The fact that Emilio will be able to complete the work missed during the rest of the week does not mean he can claim he worked for hours on a day he did not.
- C. Yes, because Emilio submitted a timesheet reporting that he worked on a day he did not.
 - **Correct!** According to the Ethics Act, State agencies must have policies requiring their employees to periodically submit timesheets documenting the time spent each day on official State business to the nearest quarter hour. In this case, Emilio falsely claimed on his timesheet that he worked on a day he did not, thus violating his timekeeping responsibilities and falsifying official records, which is also a violation of the State of Illinois Code of Personal Conduct.

Session 5: Highlights

Report political contact regarding an employment action within 48 hours.

Employees must provide truthful statements.

Report time worked accurately when in the office or remote.

Training Reminders

There are many specific ethics rules State employees and appointees should remember. But if you need to keep it simple, remember the three key actions we can take to ensure an ethical workforce. You should:

Be Truthful Act in the Best Interest of the State Ask for Guidance

- Be truthful in all aspects of your work, such as timekeeping, hiring, reporting your financial and personal interests, and communicating with the OEIG.
- As a public servant, your conduct should further the State's best interest. Thus, if your personal interests conflict with the interests of the State, or could appear to do so, the State's interests should prevail.
- Some ethics rules are specific and follow precise processes. You do not have to guess the process; there are resources, such as your Ethics Officer, who can assist you in understanding or obtaining the best information.

As highlighted throughout this training, State employees who violate ethics-related laws, rules, and policies may face significant penalties, depending upon the specific circumstances. Penalties may include administrative action up to and including termination of employment, and even criminal prosecution in certain instances. In addition, the EEC may levy **administrative fines** (<https://ilga.gov/legislation/ILCS/details?MajorTopic=&Chapter=&ActName=State%20Officials%20and%20Employees%20Ethics%20Act.&ActID=2529&ChapterID=2&ChapAct=5+ILCS+430%2F&SeqStart=8100000&SeqEnd=8400>) for certain violations of the Ethics Act.

Before you go, we want to hear your feedback!

Congratulations! You have reached the end of your annual 2026 Ethics Training - **please be sure to certify your participation on the next slide.** If you wish to view a printable version of this training, visit **OneNetTraining: 2026 Ethics Training Program for State Employees and Appointees** ([page.aspx?item=174258&media=print](https://one.nettraining.illinois.gov/one.nettraining/page.aspx?item=174258&media=print)). For a list of reference links included in this training, visit the OEIG's Ethics Training Resources web page at [oeig.illinois.gov](https://oeig.illinois.gov/ethics/ethics-training.html) (<https://oeig.illinois.gov/ethics/ethics-training.html>).

We encourage you to complete this **training survey** ([page.aspx?module=17&type=3&item=168799&surveyid=1676](https://one.nettraining.illinois.gov/one.nettraining/page.aspx?module=17&type=3&item=168799&surveyid=1676)) and leave any suggestions you may have about this training or topics for future training. **If you take the survey, be sure to return to this training to certify your participation on the next slide.** Your input is important to us in ensuring we deliver the most effective training, enabling all State employees to be informed and deliver exemplary public service.

Comments or questions about State policies, or reports of potential violations, should **NOT** be included in the survey. If you have a question concerning a work-related ethics issue, please contact your State agency's Ethics Officer. To report a non-emergency violation of the law, rule, regulation, or policy, please contact the OEIG via the [OEIG website \(https://oeig.illinois.gov/\)](https://oeig.illinois.gov/), hotline at (866) 814-1113, or via TTY at (888) 261-2734.

Certification**Acknowledgement of Participation in:****2026 Echthics Training Program for State Employees and Appointees**

**Please sign and return the Certificate of Completion to Warren Ribley,
Executive Director.**
