

1346166A	01/25/22	10.00	\$195.00	\$1,950.00	Worked
1346166A	01/26/22	10.00	\$292.50	\$2,925.00	Overtime after 20 hours worked
1346166A	01/28/22	10.25	\$292.50	\$2,998.13	Overtime after 30 hours worked
1348063A	01/29/22	10.00	\$195.00	\$1,950.00	Worked
1348063A	01/30/22	10.00	\$195.00	\$1,950.00	Worked
1348063A	01/31/22	10.00	\$195.00	\$1,950.00	Worked
1348063A	02/01/22	10.00	\$195.00	\$1,950.00	Worked
1348063A	02/02/22	10.00	\$292.50	\$2,925.00	Standby: No work yet paid overtime
1348063A	02/04/22	10.00	\$292.50	\$2,925.00	Worked
1349932A	02/05/22	10.00	\$195.00	\$1,950.00	Worked
1349932A	02/06/22	10.00	\$195.00	\$1,950.00	Worked
1349932A	02/07/22	10.00	\$195.00	\$1,950.00	Worked
1349932A	02/08/22	10.00	\$195.00	\$1,950.00	Worked
1349932A	02/09/22	10.00	\$292.50	\$2,925.00	Worked
1349932A	02/11/22	10.00	\$292.50	\$2,925.00	Worked
1351806A	02/12/22	10.00	\$195.00	\$1,950.00	Standby: No work yet paid
1351806A	02/14/22	10.00	\$195.00	\$1,950.00	Standby: No work yet paid
1351806A	02/15/22	10.00	\$195.00	\$1,950.00	Standby: No work yet paid
1351806A	02/16/22	10.00	\$195.00	\$1,950.00	Standby: No work yet paid
1351806A	02/17/22	10.00	\$292.50	\$2,925.00	Standby: No work yet paid overtime
1351806A	02/18/22	10.00	\$292.50	\$2,925.00	Standby: No work yet paid overtime
1353653A	02/19/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1353653A	02/21/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1353653A	02/22/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1353653A	02/23/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1353653A	02/24/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid overtime
1353653A	02/25/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid overtime
1355506A	02/26/22	10.00	\$195.00	\$1,950.00	Standby: No work yet paid
1355506A	02/28/22	10.00	\$195.00	\$1,950.00	Standby: No work yet paid
Total Cost			\$79,823.13		
Case #14					
1275695	04/05/21	12.00	\$95.00	\$1,140.00	Worked
1275695	04/06/21	12.00	\$95.00	\$1,140.00	Worked
1275695	04/08/21	12.00	\$95.00	\$1,140.00	Worked
1275695	04/09/21	4.00	\$95.00	\$380.00	Worked
1275695	04/09/21	8.00	\$142.50	\$1,140.00	Worked
1277274	04/10/21	12.00	\$95.00	\$1,140.00	Worked
1277274	04/11/21	12.00	\$95.00	\$1,140.00	Worked
1277274	04/12/21	12.00	\$95.00	\$1,140.00	Worked
1277274	04/13/21	4.00	\$95.00	\$380.00	Worked
1277274	04/13/21	8.00	\$142.50	\$1,140.00	Worked
1277274	04/15/21	12.00	\$142.50	\$1,710.00	Worked
1277274	04/16/21	12.00	\$142.50	\$1,710.00	Worked
1278902	04/17/21	12.00	\$95.00	\$1,140.00	Worked
1278902	04/18/21	12.00	\$95.00	\$1,140.00	Worked
1278902	04/19/21	12.00	\$95.00	\$1,140.00	Standby: No work yet paid
1278902	04/20/21	4.00	\$95.00	\$380.00	Worked
1278902	04/20/21	8.00	\$142.50	\$1,140.00	Overtime after 28 hours worked
1278902	04/22/21	12.00	\$142.50	\$1,710.00	Overtime after 36 hours worked
1278902	04/23/21	12.00	\$142.50	\$1,710.00	Worked
1280372	04/24/21	12.00	\$95.00	\$1,140.00	Worked
1280372	04/25/21	12.00	\$95.00	\$1,140.00	Worked
1280372	04/26/21	12.00	\$95.00	\$1,140.00	Worked
1280372	04/27/21	4.00	\$95.00	\$380.00	Worked
1280372	04/27/21	8.00	\$142.50	\$1,140.00	Worked
1280372	04/29/21	12.00	\$142.50	\$1,710.00	Worked
1280372	04/30/21	12.00	\$142.50	\$1,710.00	Worked
1281960	05/01/21	12.00	\$95.00	\$1,140.00	Worked
1281960	05/02/21	12.00	\$95.00	\$1,140.00	Worked
1281960	05/03/21	12.00	\$95.00	\$1,140.00	Worked
1281960	05/04/21	4.00	\$95.00	\$380.00	Worked
1281960	05/04/21	8.00	\$142.50	\$1,140.00	Worked

1281960	05/06/21	12.00	\$142.50	\$1,710.00		Worked
1281960	05/07/21	12.00	\$142.50	\$1,710.00		Worked
1283551	05/08/21	12.00	\$95.00	\$1,140.00	Standby: No work yet paid	
1283551	05/09/21	12.00	\$95.00	\$1,140.00		Worked
1283551	05/10/21	12.00	\$95.00	\$1,140.00		Worked
1283551	05/11/21	4.00	\$95.00	\$380.00		Worked
1283551	05/11/21	8.00	\$142.50	\$1,140.00		Worked
1283551	05/13/21	12.00	\$142.50	\$1,710.00		Worked
1283551	05/14/21	12.00	\$142.50	\$1,710.00		Worked
1285180	05/15/21	12.00	\$95.00	\$1,140.00		Worked
1285180	05/16/21	12.00	\$95.00	\$1,140.00		Worked
1285180	05/17/21	12.00	\$95.00	\$1,140.00		Worked
1285180	05/18/21	4.00	\$95.00	\$380.00		Worked
1285180	05/18/21	8.00	\$142.50	\$1,140.00		Worked
1285180	05/20/21	12.00	\$142.50	\$1,710.00		Worked
1285180	05/21/21	12.00	\$142.50	\$1,710.00		Worked
1286761	05/22/21	12.00	\$95.00	\$1,140.00	Standby: No work yet paid	
1286761	05/25/21	12.00	\$95.00	\$1,140.00		Worked
1312548	09/17/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1314199	09/18/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1314199	09/20/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1314199	09/21/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1314199	09/22/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1314199	09/23/21	10.00	\$165.00	\$1,650.00	Standby: No work yet paid	
1314199	09/24/21	10.00	\$165.00	\$1,650.00	Standby: No work yet paid	
1315893A	09/25/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1315893A	09/27/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1315893A	09/28/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1315893A	09/29/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1315893A	09/30/21	10.00	\$165.00	\$1,650.00	Standby: No work yet paid	
1315893A	10/01/21	10.00	\$165.00	\$1,650.00	Standby: No work yet paid	
1317647A1	10/02/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1317647A1	10/03/21	10.00	\$110.00	\$1,100.00	Standby: No work yet paid	
1317662	10/04/21	7.00	\$110.00	\$770.00		Worked
1317662	10/04/21	5.00	\$110.00	\$550.00		Worked
1317662	10/05/21	7.00	\$110.00	\$770.00		Worked
1317662	10/05/21	1.00	\$110.00	\$110.00		Worked
1317662	10/05/21	4.00	\$165.00	\$660.00	Overtime after 20 hours worked	
1317662	10/06/21	7.00	\$165.00	\$1,155.00	Overtime after 24 hours worked	
1317662	10/06/21	5.00	\$165.00	\$825.00	Overtime after 31 hours worked	
1317662	10/07/21	12.00	\$165.00	\$1,980.00	Overtime after 36 hours worked	
1317662	10/08/21	8.00	\$165.00	\$1,320.00	Standby: No work yet paid overtime	
1319399	10/09/21	8.00	\$110.00	\$880.00	Standby: No work yet paid	
1319399	10/11/21	8.00	\$165.00	\$1,320.00		Worked
1319399	10/12/21	12.00	\$110.00	\$1,320.00		Worked
1319399	10/13/21	12.00	\$110.00	\$1,320.00		Worked
1319399	10/14/21	8.00	\$110.00	\$880.00		Worked
1319399	10/14/21	4.00	\$165.00	\$660.00		Worked
1319399	10/15/21	8.00	\$165.00	\$1,320.00	Standby: No work yet paid overtime	
1321184	10/16/21	8.00	\$110.00	\$880.00	Standby: No work yet paid	
1321184	10/18/21	8.00	\$110.00	\$880.00	Standby: No work yet paid	
1321184	10/19/21	12.00	\$110.00	\$1,320.00		Worked
1321184	10/20/21	12.00	\$110.00	\$1,320.00		Worked
1321184	10/21/21	12.00	\$165.00	\$1,980.00	Overtime after 24 hours worked	
1321184	10/22/21	8.00	\$165.00	\$1,320.00	Standby: No work yet paid overtime	
1322953	10/23/21	8.00	\$110.00	\$880.00	Standby: No work yet paid	
1322953	10/25/21	8.00	\$110.00	\$880.00	Standby: No work yet paid	
1322953	10/26/21	12.00	\$110.00	\$1,320.00		Worked
1322953	10/27/21	12.00	\$110.00	\$1,320.00		Worked
1322953	10/28/21	12.00	\$165.00	\$1,980.00	Overtime after 24 hours worked	
1322953	10/29/21	8.00	\$165.00	\$1,320.00	Standby: No work yet paid overtime	
1324709	10/30/21	8.00	\$110.00	\$880.00	Standby: No work yet paid	

1324709	11/01/21	8.00	\$110.00	\$880.00	Standby: No work yet paid
1324709	11/02/21	12.00	\$110.00	\$1,320.00	Worked
1324709	11/03/21	12.00	\$110.00	\$1,320.00	Worked
1324709	11/04/21	12.00	\$165.00	\$1,980.00	Overtime after 24 hours worked
1324709	11/05/21	8.00	\$165.00	\$1,320.00	Standby: No work yet paid overtime
1326549A	11/06/21	8.00	\$110.00	\$880.00	Standby: No work yet paid
1326549A	11/08/21	8.00	\$110.00	\$880.00	Standby: No work yet paid
1326549A	11/09/21	12.00	\$110.00	\$1,320.00	Worked
1326549A	11/10/21	12.00	\$110.00	\$1,320.00	Worked
1326549A	11/11/21	12.00	\$165.00	\$1,980.00	Standby: No work yet paid overtime
1326549A	11/12/21	8.00	\$165.00	\$1,320.00	Standby: No work yet paid overtime
1340685A	01/05/22	10.00	\$110.00	\$1,100.00	Standby: No work yet paid
1340685A	01/06/22	10.00	\$110.00	\$1,100.00	Standby: No work yet paid
1340685A	01/07/22	10.00	\$110.00	\$1,100.00	Standby: No work yet paid
1342489A2-R	01/10/22	10.00	\$110.00	\$1,100.00	Worked
1342489A2-R	01/11/22	10.00	\$110.00	\$1,100.00	Standby: No work yet paid
1342489A2-R	01/13/22	10.00	\$110.00	\$1,100.00	Standby: No work yet paid
1342489A2-R	01/14/22	10.00	\$110.00	\$1,100.00	Standby: No work yet paid
Total Cost			\$130,420.00		
Case #15					
1312548	09/13/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1312548	09/14/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1331918A	12/02/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1331918A	12/03/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1333679A	12/04/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1333679A	12/06/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1333679A	12/07/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1333679A	12/08/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1333679A	12/09/21	10.00	\$322.50	\$3,225.00	Overtime after 0 hours worked
1333679A	12/10/21	10.00	\$322.50	\$3,225.00	Standby: No work yet paid
1335525A	12/11/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1335550	12/13/21	8.50	\$215.00	\$1,827.50	Worked
1335550	12/13/21	1.50	\$215.00	\$322.50	Standby: No work yet paid
1335550	12/14/21	10.00	\$215.00	\$2,150.00	Worked
1335550	12/15/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1335550	12/16/21	9.75	\$322.50	\$3,144.38	Overtime after 18.5 hours worked
1335550	12/16/21	0.25	\$322.50	\$80.63	Standby: No work yet paid overtime
1335550	12/17/21	10.00	\$322.50	\$3,225.00	Standby: No work yet paid overtime
1337261	12/18/21	10.00	\$215.00	\$2,150.00	Standby: No work yet paid
1337261	12/20/21	10.00	\$215.00	\$2,150.00	Worked
1337261	12/21/21	4.00	\$215.00	\$860.00	Worked
1337261	12/21/21	6.00	\$215.00	\$1,290.00	Standby: No work yet paid
1337261	12/22/21	10.00	\$215.00	\$2,150.00	Worked
1337261	12/23/21	10.00	\$322.50	\$3,225.00	Standby: No work yet paid overtime
1337261	12/24/21	10.00	\$322.50	\$3,225.00	Standby: No work yet paid overtime
1338943	12/25/21	10.00	\$292.50	\$2,925.00	Worked
1338943	12/27/21	10.00	\$195.00	\$1,950.00	Worked
1338943	12/28/21	10.00	\$195.00	\$1,950.00	Worked
1338943	12/29/21	10.00	\$195.00	\$1,950.00	Standby: No work yet paid
1338943	12/30/21	10.00	\$195.00	\$1,950.00	Worked
1338943	12/30/21	0.25	\$292.50	\$73.13	Worked
1338943	12/31/21	10.00	\$292.50	\$2,925.00	Standby: No work yet paid overtime
1340711	01/01/22	10.00	\$330.00	\$3,300.00	Worked
1340711	01/03/22	10.00	\$220.00	\$2,200.00	Worked
1340711	01/04/22	10.00	\$220.00	\$2,200.00	Worked
1340711	01/05/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1340711	01/06/22	10.00	\$220.00	\$2,200.00	Worked
1340711	01/07/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid overtime

1342513	01/08/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1342513	01/10/22	10.00	\$220.00	\$2,200.00	Worked
1342513	01/11/22	10.00	\$220.00	\$2,200.00	Worked
1342513	01/12/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1342513	01/13/22	10.00	\$330.00	\$3,300.00	Overtime after 20 hours worked
1342513	01/14/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid overtime
1344359	01/15/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1344359	01/17/22	10.00	\$330.00	\$3,300.00	Worked
1344359	01/18/22	10.00	\$220.00	\$2,200.00	Worked
1344359	01/19/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1346166A-R	01/24/22	10.00	\$220.00	\$2,200.00	Worked
1346166A-R	01/25/22	10.00	\$220.00	\$2,200.00	Worked
1346166A-R	01/26/22	12.00	\$220.00	\$2,640.00	Worked
1346166A-R	01/27/22	8.00	\$220.00	\$1,760.00	Worked
1346166A-R	01/27/22	4.00	\$330.00	\$1,320.00	Worked
1346166A-R	01/28/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1348063A-R	01/29/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1348063A-R	01/31/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1348063A-R	02/01/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1348063A-R	02/02/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1348063A-R	02/03/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1348063A-R	02/04/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1349932A	02/05/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1349932A	02/07/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1349932A	02/08/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1349932A	02/09/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1349932A	02/10/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1349932A	02/11/22	10.00	\$330.00	\$3,300.00	Worked
1351806A	02/12/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1351806A	02/14/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1351806A	02/15/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1351806A	02/16/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1351806A	02/17/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1351806A	02/18/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1353653A	02/19/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1353653A	02/21/22	10.00	\$330.00	\$3,300.00	Standby: No work yet holiday pay
1353653A	02/22/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1353653A	02/23/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1353653A	02/24/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1353653A	02/25/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1355506A-R	02/26/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1355506A-R	02/28/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1355506A-R	03/01/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1355506A-R	03/02/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1355506A-R	03/03/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1355506A-R	03/04/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1357328A	03/05/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1357328A	03/07/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1357328A	03/08/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1357328A	03/09/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1357328A	03/10/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1357328A	03/11/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1359153-R	03/12/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1359153-R	03/14/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1359153-R	03/15/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1359153-R	03/16/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1359153-R	03/17/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1359153-R	03/18/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1360965A-R	03/19/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1360965A-R	03/21/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1360965A-R	03/22/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid
1360965A-R	03/23/22	10.00	\$220.00	\$2,200.00	Standby: No work yet paid

1360965A-R	03/24/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
1360965A-R	03/25/22	10.00	\$330.00	\$3,300.00	Standby: No work yet paid
Total Cost				\$244,793.13	

Note: Cases #4 and #11 were Innovative Emergency Management staff.

Source: OAG prepared using IEMA-OHS invoices from Favorite Healthcare Staffing.

Appendix G

Agency Responses



IEMA-OHS

ILLINOIS EMERGENCY MANAGEMENT AGENCY
AND OFFICE OF HOMELAND SECURITY

JB Pritzker
Governor

Theodore (Ted) Berger
Director

May 19, 2026

Submitted via EMAIL to mmaziarz@auditor.illinois.gov

Dear Auditor General Christopher B. Meister:

The Illinois Emergency Management Agency and Office of Homeland Security (IEMA-OHS or Agency) appreciates the work performed by Senior Audit Manager Mike Maziarz and your team in conducting the performance audit pursuant to House Resolution 167 regarding contracts and staffing of IEMA-OHS through fiscal years 2022 and 2023. We also appreciate the opportunity for the Exit Conference to discuss the recommendations detailed in the audit report.

Enclosed with this letter are the Agency's detailed responses addressing the recommendations of your office. Broadly speaking, the Agency agrees with the recommendations of this audit. With recognition that there is much to learn from our experience during the global pandemic, we share critical background and context against which this report should be read.

Unprecedented Global Disaster Response

COVID-19 rapidly evolved from what was believed to be isolated cases of a novel coronavirus (SARS-CoV-2 causing the disease "COVID-19") into a broad global pandemic with statewide impacts across Illinois. A federal Major Disaster Declaration was in place for the period of January 20, 2020 through May 11, 2023, along with 43 Gubernatorial Proclamations issued. Between FEMA and direct Congressional aid to Illinois and Illinois families, the federal response included over \$15.4 billion in assistance to address this disaster alone. The pandemic's magnitude and duration created significant operational challenges that required unprecedented and sustained disaster response activities.

At the outset, scientific information regarding the transmission, morbidity, and mitigation strategies was incomplete. State actions often required rapid adjustments based on emerging federal and international guidance. Illinois, like all other states, experienced acute shortages in emergency equipment, personal protective equipment, COVID-19 testing materials, and healthcare personnel, necessitating emergency procurement strategies and cross-sector coordination. This context is a critical backdrop for understanding this report, as Illinois' contracts during this timeframe cannot be read in isolation. Instead, it is crucial to recognize that Illinois was

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competing with every other state, as well as foreign governments for these vital, life-saving and limited resources in an unprecedented and extraordinary disaster response.

Scarce Medical Resources and the Need for Billable Hour Contracts and Standby Time

Emergency response systems must maintain readiness before demand fully materializes during major disasters and public health emergencies. The COVID-19 pandemic created rapidly evolving and uncertain conditions regarding hospitalization trends, staffing demands, geographic surge patterns, and the duration of response operations. During this period:

- healthcare staffing demand increased significantly nationwide, limiting the availability of qualified personnel;
- future surge projections changed frequently; and
- delayed mobilization risked compromising continuity of care and emergency response capability.

Operational decisions were made based on contemporaneous public health information, staffing availability, and projected surge risks known at the time, and reflected good-faith operational judgments made during ever-evolving conditions. The duration and magnitude of the COVID-19 response increased the market-commanded premiums for scarce resources such as skilled nurses and medical professionals, personal protective equipment, and medical supplies.

Standby compensation during the COVID-19 response was consistent with longstanding practices utilized throughout emergency management, public safety, healthcare, utility restoration, and disaster response systems to preserve immediate response capability during periods of significant uncertainty. This process reduces mobilization delays and supports continuity of disaster response operations. Compensation in these circumstances is associated with maintaining deployment readiness and surge-response capability. In addition, federal disaster response frameworks recognize that emergency operations may require personnel and resources to be pre-positioned before impacts are fully realized. FEMA guidance has recognized certain standby and pre-positioning costs associated with emergency protective measures and continuity of operations under applicable emergency authorities.

Flexible Disaster Response

During a disaster response, the Agency's pressures are unique in that it must balance all contractual awards with the State's need to mitigate dangers and threats to the public health and safety of the residents and visitors of Illinois. This balance, and the ability through Section 7 of the Illinois Emergency Management Agency Act (IEMA Act) to suspend provisions of the Illinois Procurement Code that hinder or delay a response activity, is vital to ensuring the protection of lives and property and cannot be understated both in terms of the COVID-19 response and in planning for potential future disasters.

The COVID-19 pandemic presented a test of the State's capabilities. Every disaster response, and each exercise conducted, is an opportunity to learn so that future response efforts evolve and continuously improve. This disaster response pressed the Agency and the State further beyond what prior disaster responses imagined, presenting new challenges in the scramble for supplies, trained professionals, and access to life saving drugs and equipment. Due to the flexibilities provided through the IEMA Act, Illinois remained a national leader in keeping residents safe, protected and supported our communities while avoiding worse outcomes, and aggressively responded to other events as they arose amidst the complications of the pandemic. This audit is a learning opportunity, but we should not forget the unprecedented nature of the demands the pandemic placed on the State.

Hindsight after recovering from a disaster affords us the clarity to better assess our challenges and enhance our work. This audit has greatly assisted the Agency to learn lessons and identify opportunities within our Agency for growth and improvement. We are reviewing, establishing, and implementing policies and procedures to safeguard fiscal processes for future disasters. Against this backdrop, we accept the recommendations of this report, and the opportunity to improve our responses to disasters, large and small, and while best protecting the residents of Illinois.

If you require any additional information or have questions, please contact our Chief Internal Auditor, Candice Long, at (217)720-6242 or Candice.M.Long@illinois.gov.

Sincerely,


SIGNED ORIGINAL ON FILE

Theodore D. Berger
Director

Attachments

cc: IEMA-OHS Chief Internal Auditor

1. Contractors Paid for Time Not Worked

Recommendation

IEMA-OHS should, in terms of contractual relationships where staff are provided, conduct and document an analysis of the demand for those contractor staff. Additionally, if contractor staff are not needed, IEMA-OHS should consider developing contractual criteria that either lowers rates paid or limits paying for time not worked.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation, that prior to any procurement, a documented analysis will be conducted to determine the specific needs of the Agency. Historically, prior to the award of a contract, the Agency engages in an analysis which includes criteria such as the specific capabilities, skills, certifications, locations, dates and times, availability, deployment flexibility, and the overall capability of a potential vendor to provide and sustain required contractual services.

The Agency recognized the need to document contractual oversight procedures and implemented corrective action in November 2023 through a Standard Operating Procedure (SOP) entitled "IEMA-OHS Process and Procedure for Ordering from and Managing an Agency Service Contract." An additional component of the SOP requires the creation of an individualized service contract checklist containing key contractual elements and instructions related to contract management. This checklist assists IEMA-OHS contract management staff to prioritize contractual elements and manage contractual staff efficiently. As a result of this audit, the Agency is in the process of revising and refining this SOP accordingly to ensure appropriate documentation and address the concerns raised in this recommendation. The Agency is seeking additional opportunities to train and exercise staff on the application of the SOP and the Federal Emergency Management Agency (FEMA) guidance.

Although agreeing with this recommendation generally, the Agency notes that in major disaster responses, organizations routinely compensate personnel for maintaining readiness and rapid deployment availability even when personnel are not continuously engaged in active field operations. This is commonly known as standby time. Examples of standby time include firefighters assigned to station readiness, EMS personnel pre-positioned ahead of anticipated surge events, healthcare personnel maintained on-call during patient surges and disaster-response personnel housed in temporary lodging pending deployment assignments. Emergency response systems must maintain readiness before demand fully materializes during major disasters and public health emergencies. The COVID-19 pandemic created rapidly evolving and uncertain conditions regarding hospitalization trends, staffing demands, geographic surge patterns, and the duration of response operations. During this period, healthcare staffing demand increased significantly nationwide, limiting the availability of qualified personnel. Surge projections changed frequently and delayed mobilization risked compromising continuity of care and disaster response capability. Operational decisions were made based on contemporaneous public health information, staffing availability, projected surge risks

known at the time, and reflected good-faith operational judgments made under rapidly evolving conditions. Under these circumstances, standby staffing capacity was consistent with established emergency management practices emphasizing preparedness, continuity of operations, and surge readiness under conditions. Releasing personnel during temporary reductions in operational demand created substantial risk that critical medical staffing resources would not be available if conditions deteriorated or demand rapidly increased.

FEMA guidance has recognized certain standby time and pre-positioning costs associated with emergency protective measures and continuity of operations under applicable emergency authorities. IEMA-OHS follows FEMA's Public Assistance Program Policy Guide (PAPPG), which provides guidance regarding eligible reimbursement costs incurred by a State recipient under the Public Assistance Grant Program. Specifically, PAPPG references that Public Assistance funding for labor costs related to intermittent standby time for staff conducting eligible emergency medical care are allowable when standby time use and pay are consistent with a contract that requires payment for standby time. Two key criteria must be met in order for standby time costs to be eligible for reimbursement: (1) The standby time must have occurred when it was necessary to have resources available to conduct the respective life-saving action and the number of hours, and (2) individuals were reasonable and necessary based on the number of resources required, (PAPPG Version 4, effective June 1, 2020, pg. 71). FEMA manages the Public Assistance Grant Program and as such makes the final determination of reasonable cost eligibility for projects related to the Federal Public Assistance Grant Program including costs associated with standby time. All costs associated with the Agency staffing contracts that included standby time were submitted to FEMA, approved, and reimbursed to the Agency by FEMA. FEMA's approval reflects the Agency's compliance with this guidance.

2. **Evaluation of Vendor Proposals**

Recommendation

IEMA-OHS should ensure all vendor proposals are reviewed in an unbiased, fair, consistent, and thorough manner, including during State declared disasters.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation. In exercising the award of contracts during a disaster, IEMA-OHS is careful to only suspend provisions of the Illinois Procurement Code (30 ILCS 500) where Section 7(1) of the Illinois Emergency Management Agency Act (IEMA Act) is invoked, to the extent necessary to preserve life and property. For each contract awarded under the disaster proclamation, IEMA-OHS' legal and procurement staff closely review each such suspension to ensure that contracts are awarded in a fair, unbiased, and thorough manner, to the extent possible, and that such awards conform with federal standards pursuant to 2 CFR 200. This process conforms with the Agency's policy dated March 5, 2015, entitled "Procurement during a State Declared Disaster (Disaster Procurement Policy)." During the COVID-19 disaster,

IEMA-OHS Procurement Office completed over 1,200 resource requests for purchases and contracts for services. These resource requests were essential to the Agency's COVID-19 response efforts and mandate to protect public health and safety. As a result, time was a critical implementing factor. Despite this criticality, the Agency maintains that each of these contracts were reviewed in conjunction with the Disaster Procurement Policy, as well as applicable State and federal laws, and FEMA guidance. Based upon these recommendations, IEMA-OHS is in the process of updating this existing Disaster Procurement Policy to ensure adequate review and documentation of disaster procurement procedures. The Agency is seeking additional opportunities to train and exercise staff on the application of the SOP.

3. Contract Execution Signature Issues

Recommendation

IEMA-OHS should ensure all contracts, basic ordering agreements, and contract amendments are signed by both IEMA-OHS and the contractors on or before the effective date.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation and seeks to ensure that all contracts are signed prior to their effective date. In awarding contracts during a disaster, IEMA-OHS is careful to only suspend provisions of the Illinois Procurement Code, where Section 7(1) of the IEMA Act is invoked, to the extent necessary to preserve life and property. For each contract awarded under the disaster proclamation, legal and procurement staff closely review each such suspension to ensure compliance with the intent of the Procurement Code while recognizing the unique nature of timely emergency response. This process conforms with the Agency's policy dated March 5, 2015, entitled "Procurement during a State Declared Disaster." IEMA-OHS is presently in the process of updating this existing policy to ensure adequate review and documentation of disaster procurement procedures. The Agency is seeking additional opportunities to train and exercise staff on the application of the SOP.

4. Failure to Enforce Contract Requirement on Idle Contractors

Recommendation

IEMA-OHS should enforce contract provisions related to billable-hour contracts and document how compliance with the provisions was accomplished. Additionally, IEMA-OHS should maintain documentation to support how many contractual staff are needed to best utilize available funding.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation. The Agency recognized this weakness and implemented corrective action in November 2023 through the SOP entitled "IEMA-OHS Process and Procedure for Ordering from and Managing an Agency Service Contract." The Agency believes the SOP addresses this recommendation, as it

establishes more thorough contract management duties, including accountability for contract deliverables and compliance. An additional component of the SOP requires the creation of an individualized service contract checklist containing key contractual elements and instructions related to contract management. This checklist assists IEMA-OHS contract management staff to prioritize contractual elements and manage contractual staff efficiently. As a result of this audit, the Agency is in the process of reviewing this SOP, with the goal of revising and refining the procedure to better address the concerns raised in this recommendation. The Agency is seeking additional opportunities to train and exercise staff on the application of the SOP.

5. Adequate Support for Billings

Recommendation

IEMA-OHS should ensure vendors provide adequate timesheet documentation for billable-hour contracts. IEMA-OHS should verify that timesheets are provided with a standardized format, detailed descriptions of work completed, and contractor signatures or other documented mechanisms for certifying the accuracy of their timesheet. IEMA-OHS should ensure vendors provide adequate timesheet documentation for billable-hour contracts. IEMA-OHS should verify that timesheets are provided with a standardized format, detailed descriptions of work completed, and contractor signatures or other documented mechanisms for certifying the accuracy of their timesheet.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation. In conducting a review of documentation prior to this audit, the Agency independently recognized this issue and implemented corrective action by adopting in November 2023 the SOP entitled "IEMA-OHS Process and Procedure for Ordering from and Managing an Agency Service Contract." The SOP specifically requires the contract manager responsible for contractor oversight will ensure that all timesheets are reviewed for accuracy in accordance with the Basic Order Agreement (BOA) and contract in Section V.C. An additional component of the SOP requires the creation of an individualized service contract checklist containing key contractual elements and instructions related to contract management. This checklist assists IEMA-OHS contract management staff to prioritize contractual elements and manage contractual staff efficiently. As a result of this audit, the Agency is in the process of reviewing the SOP, with the goal of revising and refining the procedure to better address the concerns raised in this recommendation. The Agency is seeking additional opportunities to train and exercise staff on the application of the SOP.

6. Invoice Billing Oversight Deficiencies

Recommendation

IEMA-OHS should devote sufficient resources to the review of billable-hour contractors, prior to making payments to vendors, to ensure that taxpayer funds are protected from loss. Additionally, IEMA-OHS should require all billable-hour contractors to maintain signatures or other documented mechanisms, on time reports for time billed to the State

of Illinois for certifying the accuracy of the time reports. Finally, IEMA-OHS should have policies and procedures in place for invoice review prior to commencing work with the contractors.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation. In conducting a review of documentation prior to this audit, the Agency independently recognized this issue and implemented corrective action by adopting in November 2023 the SOP entitled "IEMA-OHS Process and Procedure for Ordering from and Managing an Agency Service Contract." The SOP addresses contract management and oversight by requiring contract managers to ensure that invoiced hours and costs are accurate and supported with documentation in Sections IV and V. The SOP requires individualized review of documentation to ensure accuracy and completeness.

7. Monitoring Contract Deliverables

Recommendation

IEMA-OHS should ensure all contract deliverables are completed by its contractors and amend deliverables as needed to reflect the agency's expectations from the vendor.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation. In hindsight, the Agency acknowledges best practice would have been to amend specific deliverables as needed to reflect evolving expectations. The Agency notes that the contracts addressed in these reviews are billable-hour service contracts. Deliverables under these contracts are the equivalent of a menu of general and specific services that the Agency could have ordered against as needed. In this instance, the Agency chose to dedicate contractor time to those efforts that the Agency could not perform. The Agency determined that it was in the best interest of the public to have contractors perform these tasks based upon the rapidly changing circumstances of the Agency's disaster response.

8. Overpayment of Premium Rate to Contractor

Recommendation

IEMA-OHS should develop policy whereby billable-hour contractors that charge an all-inclusive rate will have the rate reduced when not all the components of the rate are utilized.

IEMA-OHS Response

The Agency agrees with this recommendation and commits to awarding contracts and rates to ensure that all awards are competitive to the market and appropriate to the award. IEMA-OHS takes seriously its commitment to prevent waste, fraud, and abuse of

taxpayer dollars, and seeks to balance all awards with the Agency's mandate to mitigate dangers and threats to the public health and safety of Illinois residents.

IEMA-OHS acknowledges at the time these contracts were procured, the market for staffing contracts demanded an all-inclusive rate due to the shortage of skilled professionals and competitive demand across the country. Additionally, the Agency's medical staffing contracts were designed to ensure the vendor was primarily recruiting out-of-state medical staff in order to avoid competition with Illinois hospitals. The Agency attempted to keep these contracts competitive by limiting the term of each, allowing for both the reevaluation of the State's need and an opportunity to capture the current rate and inclusion at each short-term period. The Agency is in the process of updating the Agency's policy dated March 5, 2015, entitled "Procurement during a State Declared Disaster" with clarification that the Agency will perform a documented review of current contractual rates prior to each renewal period to ensure that competitive market pricing is taken into account prior to moving forward with a contract renewal.

9. Using Contractual Staff in Regular State Agency Positions

Recommendation

IEMA-OHS should develop procedures on when to utilize billable-hour contractors in lieu of regular State employees to perform work. The procedures should address the negotiation of rates and take into consideration rates paid to regular State employees for the same work.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation. In conducting a review of use of contractors prior to this audit, the Agency independently recognized this issue and implemented corrective action by adopting in November 2023, the SOP entitled "IEMA-OHS Process and Procedure for Ordering from and Managing an Agency Service Contract." In Section IV, "Ordering Process," the SOP outlines the process whereby Agency job titles and duties are reviewed against the ordered work to ensure that duplication is limited to only emergent needs and timely notification is sent to impacted bargaining units. The process requires review by the Chief Fiscal Officer, Chief Legal Counsel, Human Resources Director, and Labor Relations Administrator to ensure that the contract minimizes these risks.

10. Billable-Hour Contract Overtime

Recommendation

IEMA-OHS should implement and enforce an approval process for time worked by billable-hour contractors exceeding an appropriate number of hours.

IEMA-OHS Response

IEMA-OHS agrees with this recommendation. In conducting a review of contractor time prior to this audit, the Agency independently recognized an issue and implemented corrective action by adopting in November 2023 the SOP entitled “IEMA-OHS Process and Procedure for Ordering from and Managing an Agency Service Contract.” In Section IV, “Ordering Process,” the SOP outlines the process whereby Agency job titles and duties are reviewed against the ordered work to ensure that duplication is limited to only emergent needs and ensures timely notification to impacted bargaining units. The process requires review by the Chief Fiscal Officer, Chief Legal Counsel, Human Resources Director, and Labor Relations Administrator to ensure the minimization of the risk of contractors exceeding an appropriate number of hours. Section V of the SOP provides for additional oversight by designating a contract manager to track and review contractor hours to ensure all time utilized is in the best interests of the Agency and State of Illinois.

