



OFFICE OF THE INSPECTOR GENERAL
Illinois State Toll Highway Authority

NOTICE OF POSTING
OIG Case # IG-2017-001
Respondent: Zion N. Ross

Pursuant to 605 ILCS 10/8.5 (e)(3), the attached redacted summary report is being posted to the Illinois Toll Highway Authority's public website. As required by law, the Office of the Inspector General for the Illinois Toll Highway Authority sent a copy of this report to the Respondent and gave her fifteen days, until January 31, 2018, to provide suggested redactions or a written response. Respondent provided no response.

OIG issued a summary report on September 6, 2017 that described its investigation, which provided reasonable cause to find that Respondent failed to provide complete and truthful information about her prior criminal convictions, after she had been selected as a Toll Collector. Respondent admitted to OIG investigators that she was not truthful about her actions that lead to her conviction for Attempt Robbery/Party to a Crime. She further admitted that she had subsequently been convicted for Misappropriation of Identity resulting from her improper use of personal information of a client of her former employer. Respondent resigned after her interview; had she not resigned, the OIG would have recommended her discharge. The OIG recommended that Respondent be considered ineligible for re-hire, and also made recommendations to improve the background checks conducted as part of the hiring process.

The Tollway responded that it agreed with the OIG findings and recommendation to consider Respondent ineligible for re-hire. The Tollway further indicated that the background check process is being evaluated and revised to address OIG's concerns and that it will provide updates.



**OFFICE OF THE INSPECTOR GENERAL
SUMMARY REPORT OF INVESTIGATION
OIG Case # IG-2017-001
September 6, 2017**

This report provides a summary of evidence set out in the attached investigative materials, and the Office of the Inspector General's (OIG's) analysis of that evidence. An index of these investigative materials is attached.

I. INTRODUCTION

OIG received information from the Illinois State Police, District 15 (ISP) that Zion Ross, aka Nicole M. Ross, (Ross), Toll Collector, had an extensive criminal history that may not have been fully considered before she was hired as a Seasonal Toll Collector. Our investigation determined that the decision to approve Ross' hire was made without a complete understanding of relevant aspects of her criminal history. First, Ross failed to provide complete and truthful information to the Criminal Background Review Committee (CBRC) about her prior conviction for Attempt Robbery/Party to a Crime. Second, Ross' arrest and conviction for Misappropriation of Identity was apparently not available to the CBRC or the Administrative Review Board¹ (ARB). When interviewed by the OIG, Ross admitted that she had been untruthful with the CBRC about her actions that lead to her conviction for Attempt Robbery/Party to a Crime, and admitted she had also been convicted for Misappropriation of Identity resulting from her improper use of personal information of a client of her former employer. OIG would have recommended Ross' discharge for lying to the CBRC, but she resigned. This investigation identified limitations in Ross' background check, and OIG recommends that the Tollway review the candidate background check process to determine if it ensures a fair and complete assessment of selected candidates' suitability for employment.

II. APPLICABLE RULES

A. The Illinois State Toll Highway Authority Employee Policies and Procedures Manual, Chapter I: General Policies and Responsibilities, Section A: "Fundamental Principles", provides in relevant part:

The Tollway requires public trust and confidence in its employees. Integrity is essential. Employees must act according to the highest ethical principles and standards, in accordance with the Tollway's Code of Ethics, the State of Illinois Code of Personal Conduct, and all applicable local, state and federal laws imposing standards of ethical behavior. Employees should avoid all situations that could give the appearance of conflict of interest or impropriety. Violations will be grounds for discipline up to and including discharge.

¹ Under the current Tollway Policy Manual this body is now called the Criminal Background Review Board. This report will use the term Administrative Review Board, which is what it was called during the relevant time period.

B. The Illinois State Toll Highway Authority Employee Policies and Procedures Manual, Chapter II: Recruitment and Retention of Employees, Section A: “General Policy”, provides in relevant part:

The Tollway’s goal is to attract and retain competent personnel. The Tollway seeks to place employees in positions that best suit their aptitude, abilities, and skills.

C. The Illinois State Toll Highway Authority Employee Policies and Procedures Manual, Chapter II: Recruitment and Retention of Employees, Section B: “Position Qualifications”, provides in relevant part:

A candidate to whom a conditional offer of employment is extended will be subject to a criminal background check and the provisions contained in Section H below. Any conviction history discovered in that process will cause the Tollway to conduct an individualized assessment with the candidate before a final employment decision is made.

D. The Illinois State Toll Highway Authority Employee Policies and Procedures Manual, Chapter II: Recruitment and Retention of Employees, Section D; “Employment Reference Checks”, provides in relevant part:

To ensure that individuals who join the Tollway are well qualified and have a strong potential to be productive and successful employees, it is the policy of the Tollway to verify the employment and personal references of any candidate extended a conditional offer of employment or any other applicants.

E. The Illinois State Toll Highway Authority Employee Policies and Procedures Manual, Chapter II: Recruitment and Retention of Employees, Section H: “Criminal Background Policy”, provides in relevant part:

All Tollway employees, contract employees or consultants are required to undergo a criminal background search before employment commences or an access badge is issued. A criminal conviction is not an automatic prohibition to employment with or at the Tollway.

Pursuant to the Illinois Uniform Conviction Information Act the Tollway must provide the individual named in the request to Illinois State Police with a copy of the response furnished by the Illinois State Police. The individual will have an opportunity to verify the accuracy and completeness of the information within seven (7) working days after receiving a copy of the information furnished by the Illinois State Police. Additionally, the Tollway will conduct an individualized assessment which may consist of an in-person interview or review of the written response provided by the employee or candidate.

1. New Employees

Generally, commencement of employment is conditioned upon receipt of a satisfactory result from the criminal background check.

* * *

3. Criminal Background Review Committee

The purpose of the Criminal Background Review Committee is to conduct an individualized assessment of any candidate or employee with a criminal conviction² record. The Committee is generally comprised of three (3) Tollway employees: one (1) from Legal, one (1) from Administration and one (1) from the using department, chosen by the Chief of that department. Exceptions may be made based on the needs of the Tollway. During the individualized assessment, employees or candidates who have criminal conviction records disclosed through the fingerprinting process or who self-identify criminal convictions are entitled to submit documents and information to the Committee in support of their candidacy or continued employment. The Committee, with the input of the employee or applicant, will identify the accuracy of the criminal history disclosed. In addition, the Committee will have an opportunity to discuss with the employee or applicant the potential relevance of the conviction to the position, employment since the conviction, activities, rehabilitation or restitution since the conviction, truthfulness of the candidate, and business necessity. The employee or candidate has an obligation to provide information related to the conviction honestly and completely. The Tollway reserves the right to terminate employment based on falsification of information during the individualized assessment. The information gathered by the Committee will be provided to the Criminal Background Review Board for further consideration and action.

4. Criminal Background Review Board³

The Criminal Background Review Board consists of two designees appointed by the Executive Director. The Tollway's Legal department may provide legal counsel. The Criminal Background Review Board will consider the information provided by the Criminal Background Review Committee and make a recommendation to the Executive Director regarding the individual's suitability for employment or an identification badge, or recommendation for discipline for existing employees.

² The prior version of this provision, in effect in June 2016, referenced a candidate's "criminal history" rather than the more narrow "criminal conviction history."

³ This body was known as the Administrative Review Board in the prior Tollway Policy Manual.

F. The Illinois State Toll Highway Authority Employee Policies and Procedures Manual, Chapter VII: Employee Conduct and Discipline, Section A: “Employee Conduct”, provides in relevant part:

Violations of the rules of conduct may result in disciplinary action, up to and including discharge. The rules of conduct include, but are not limited to, the following:

- Falsification of any information contained on the employment application, or during any interview, claim form, or other document provided to the Tollway.
- Other conduct unbecoming a Tollway employee.

III. BACKGROUND

A. Complaint

On October 26, 2016, Illinois State Police, District 15 (ISP) contacted OIG to report that a recently hired Toll Collector, Ross, had an extensive history of criminal activity that may not have been fully considered prior to her hire. The report indicated that the Tollway asked ISP to conduct an additional pre-hire background check that confirmed Ross’ extensive criminal history, the most serious of which were felony charges for Armed Robbery/Party to a Crime and Misappropriation of Identity.

B. Subject

Zion Ross, aka Nicole M. Ross, Toll Collector

Ross was hired as a Seasonal Toll Collector on July 26, 2016, and she later transitioned into a permanent part-time Toll Collector. After she was given a conditional offer of employment, Ross completed an acknowledgement and release authorizing the Tollway to conduct a criminal conviction search. On January 26, 2017, following her OIG interview, Ross resigned from the Tollway.

IV. SUMMARY OF INVESTIGATION

A. Documents

1. Criminal Background Review Committee (CBRC) File, Zion Ross

The CBRC file was obtained from Tollway Administration and contains the following materials:

- a. Criminal Background Review Memo, Zion Ross (June 10, 2016)

This memo, from the CBRC to the ARB, documents the CBRC's interview of Ross and presents information about Ross' criminal history and prior employment. The memo provides in relevant part:

Ms. Ross was asked to tell us if the information [about her Attempted Robbery Threat/Force/Party to a Crime conviction] was accurate and [she] stated that the information was correct. Ms. Ross was asked to explain the circumstances surrounding the arrest, conviction, and sentence. Ms. Ross explained that her cousin had run away and had come to live with her in Wisconsin and was a part of a murder ring in Chicago. The police went to her home and requested permission to search it, which she did [sic]. Ms. Ross indicated that the police found a gun hidden in her attic used in connection with a robbery involving her cousin. When the case went to trial the [Milwaukee District] Attorney wanted Ms. Ross to testify in open court against her cousin but she did not want to, as she feared for her and her children's safety. Ms. Ross stated that she had no part in the crime but the gun was found in her house. *[emphasis added]* Ms. Ross plead guilty to a reduced charge of Attempt Robbery, threat/force. She was sentenced to 18 months' probation (withheld along with credit for 53 days, time served, if imposed).

* * *

Ms. Ross was hired at [REDACTED] shortly after this incident knowing of the incident. Ms. Ross worked for [REDACTED] [REDACTED] for 10 years, a mortgage company where she had access to confidential financial information of customers.

- b. Handwritten notes from the CBRC regarding the Ross interview (June 7, 2016)
- c. Illinois State Police Bureau of Identification (BoFI) Report re: Zion Ross.

The report documents the results of ISP's search of Illinois and FBI records. The Illinois search resulted in no criminal history, while the FBI search resulted in a four page criminal history report. Pages 2-4 of the FBI report are entirely redacted. The unredacted portions reflect:

An arrest by the Milwaukee Wisconsin Sheriff's Department for two felony charges:

- 1. Armed Robbery Party to Use Weapon
- 2. Armed Robbery Attempt Party to Use Weapon

Court disposition of those charges:

Charge 1.	Robbery Threat/Force/Party to a Crime	Dismissed
Charge 2.	Attempt Robbery Threat/Force/Party to a Crime	Guilty

- d. NEOGOV Application and Resume, Zion Ross.
- e. Illinois State Police District 15 Investigations Background Form, Zion Ross.

- f. Tollway Authorization and Release Form, Criminal Conviction Record Search, Zion Ross.

2. Administrative Review Board (ARB) Memorandum, Zion Ross (July 11, 2016)

Memorandum from the ARB, [REDACTED] and [REDACTED] to [REDACTED] recommending that Ross be deemed eligible for employment as a Seasonal Toll Collector. In the memorandum the ARB expressly found that that Ross' prior conviction for Attempted Armed Robbery/Threat/Force/Party to a Crime (Felony), although more than 16 years old, did have a nexus to the cash handling duties required of Toll Collectors. However, the ARB cited "mitigating factors" such as "limited role in the crime (gun found in her home), relative light sentence for crime (18 months' probation), and her work history since the crime (10 years of service with access to confidential information)" as the basis for its decision to recommend Ross as eligible for hire.

Section V of the memorandum is titled Decision, and the box for "concur with recommendation" is marked above [REDACTED] signature and the date July 18, 2016.

3. Personnel File, Zion Ross

OIG reviewed Ross' Tollway personnel file and obtained the following relevant records:

- a. December 17, 2015 NEOGOV Application, Zion Ross
Ross' application to the Tollway listing her reported employment history.
- b. May 11, 2016 Tollway Authorization and Release Form
Ross' signed release form authorizing the Tollway to conduct a criminal conviction search.
- c. October 4, 2016 Employment Verification Request
Faxed request to Paramount Staffing from the Tollway's HR Department. The second page indicates a 'yes' next to accuracy of the information implying the employment was verified by Paramount.
- d. October 28, 2016 Acknowledgement, Disclaimer and Receipt
Ross' acknowledgement/receipt of the Tollway's Policy and Procedure Manual.
- e. October 28, 2016 Acknowledgement, Receipt
Ross' acknowledgement/receipt of the Tollway's Policy and Procedure Manual and reading specified sections and agreeing to abide by its terms.

4. Criminal Complaint

OIG obtained a Criminal Complaint from the Milwaukee County District Attorney's Office.

- Criminal Complaint 99CF766 Armed Robbery Ross 08FEB99

A three-count criminal complaint against Ross and her co-defendant Anthony Smith including charges for Armed Robbery and Attempted Armed Robbery committed on February 8, 1999.

5. Law Enforcement Records - Milwaukee County Sheriff's Department

ISP obtained and provided OIG with a record entitled Milwaukee Co Sheriff's Report Y021209647C Identity Theft Ross 30NOV02. The report details circumstances underlying two counts of Misappropriation of Personal ID resulting in the November 30, 2002 arrest of Ross.

6. Milwaukee County Circuit Court Criminal Records

OIG obtained online public records from the Wisconsin Circuit Court Records website⁴ that reflect:

Case Number 1999CF000766 State v. Nicole M. Ross
Attempt Armed Robbery/Party to a Crime Felony B
Guilty/No Contest 4-28-1999

Case Number 2003CF000050 State v. Nicole M. Ross
2 Counts Misappropriate Personal ID Document/Info Felony D
Guilty/No Contest 7-28-2003

Case Number 2008 [REDACTED] State v. Nicole Michelle Ross
[REDACTED] Misd. A
Guilty Due to Guilty Plea 3-25-2008

Case Number 2008CM [REDACTED] State v. Nicole Michelle Ross
[REDACTED] Misd. A
Guilty Due to Guilty Plea 8-7- 2008

B. Interviews

1. [REDACTED]

An OIG Investigator spoke twice by telephone with [REDACTED], retired Support Services Manager, regarding his role in handling and delivering Illinois State Police criminal history background reports to Tollway Administration.

[REDACTED] stated that after the candidate was fingerprinted, he would request an Illinois criminal history report and an FBI criminal history report from the ISP Bureau of Identification in Springfield. [REDACTED] stated that sometimes the state report came back clear, but the FBI report would include reported arrests and convictions from other jurisdictions. After he received the BofI report, [REDACTED] said that, as directed by the Tollway Legal Department, he would redact everything except convictions. Then he would prepare a cover sheet with the report attached and

⁴ <https://wcca.wicourts.gov> (last accessed July 25, 2017).

give it to [REDACTED] her secretary, [REDACTED], or [REDACTED]. He did not specifically recall the Ross BofI report, and was unsure if he retained an unredacted copy of the report.

2. Zion Ross

On January 26, 2017, OIG Investigators interviewed Zion Ross (Ross), providing her union employee administrative advisements, orally and in writing, which she acknowledged understanding. Ross signed the waiver agreeing to proceed without union representation. Investigators asked Ross, orally and in writing, for consent to audio record the interview. Ross consented to have the interview audio-recorded.

In summary, Ross stated the following:

Ross attended a CBRC meeting where she answered questions and provided information concerning her past criminal history. Ross admitted to OIG Investigators that she had been convicted of Attempted Armed Robbery/Party to a Crime, Misappropriation of Identity and [REDACTED], but asserted that the CBRC only asked her about her conviction for Attempted Armed Robbery/Party to a Crime.

Ross explained to the CBRC that she pleaded guilty to that charge, but claimed she had no actual role in the crime and only witnessed the crime and harbored her cousin and boyfriend. Her cousin actually committed the armed robbery resulting in her arrest. However, after being read specific allegations contained in the criminal complaint, Ross eventually admitted to OIG Investigators that she lied to the CBRC when she described her role, and she provided detail about her more significant role in the armed robbery that was consistent with the facts alleged in the criminal complaint. She admitted that she called a local pizza restaurant and placed an order to allow her cousin and boyfriend to ambush and rob the pizza delivery driver. She admitted that the driver, who she described as a male black⁵, pushed his way into her home, begging Ross to call the police. She acknowledged that she initially lied to the police because she did not want herself, her cousin or her boyfriend to be caught committing the robbery, but later “owned up to it”. Ultimately, Ross admitted to OIG investigators that “I did all that” gesturing to the criminal complaint.

Ross told the OIG investigators that she did not tell the CBRC the whole truth about the Armed Robbery incident because she wanted to get the job, and that what she told the CBRC was the same untruthful version of the story she had been telling for so long that she could “tell it over and over again.”

When asked by Investigators about the two felony convictions for Misappropriation of Identity, Ross explained that in her then-employer’s⁶ parking lot she found one of her employer’s business files that contained confidential personal identifying information of a mortgage customer. Ross admitted that she kept the file and used the personal information to apply for an

⁵ A fact not contained in the criminal complaint.

⁶ In her OIG interview, Ross referred to the business as [REDACTED], but her NEOGOV application lists [REDACTED].

apartment lease and cellular service several months later. Ross admitted that, as a result of this activity, she was convicted of felony Misappropriation of Identity.

3. [REDACTED]

On January 30, 2017, OIG Investigators interviewed [REDACTED] [REDACTED] Manager providing her non-union employee administrative advisements, orally and in writing, which she acknowledged understanding. Investigators asked [REDACTED] orally and in writing, for consent to audio record the interview. [REDACTED] consented to have the interview audio-recorded.

In summary [REDACTED] stated the following:

[REDACTED] acknowledged that she has served on the CBRC as the representative from the Department of Administration for several years. She said that the materials she reviews include the candidate application, the Boffi report and sometimes other documentation if the candidate was asked to provide it. [REDACTED] understands that the criminal history reports are redacted except for convictions. [REDACTED] explained her role on the CBRC as that of fact-finder. The candidate is shown the Boffi report and asked if it is accurate; if so, the candidate is asked to explain the circumstances. While candidates are sometimes asked to provide further documentation, if the explanation does not trigger any questions, the CBRC takes the candidate at their word. [REDACTED] said that, because candidates are not asked for an affirmation and are not under oath at the CBRC meeting, she hopes that they tell the truth. Based on her experience, [REDACTED] has not known the CBRC to ever verify a candidate's employment history or confirm a candidate's explanation of their criminal activity.

After the meeting, if no additional documents are requested, [REDACTED] prepares a draft memorandum and sends it to the other members for review and comment. The memo includes such information as the nature and age of the conviction, the candidate's explanation, the position sought and the candidate's job history. Once final, [REDACTED] sends the memo to the Administrative Review Board (ARB) along with the materials from the CBRC, including the member's notes, and she is not told of the ultimate hiring decision.

After reviewing the CBRC materials for Ross, [REDACTED] remembered the meeting and said that she thought that Ross' Attempted Armed Robbery conviction would preclude her from a position as a Toll Collector. [REDACTED] opined that, maybe because Ross plead guilty to a reduced offense, the committee accepted her explanation, and did not ask clarifying questions or ask for supporting documentation.

4. [REDACTED]

On January 27⁷ and 30⁸, 2017, OIG Investigators spoke with [REDACTED], [REDACTED] of Toll Services, about the CBRC process in general and her involvement in the Ross CBRC meeting.

⁷ On January 27, 2017, an OIG investigator spoke with [REDACTED] by telephone.

In summary [REDACTED] stated the following:

[REDACTED] acknowledged that she has served on several CBRC meetings during her tenure. She said that while there are no written guidelines to follow when serving on the CBRC, she said she generally reviews a copy of a redacted BofI report and the candidate's application before the committee meeting. [REDACTED] said that she does not know who does the redactions or why, but if the report is redacted then the committee does not receive an un-redacted copy. [REDACTED] said that she is involved in the CBRC as a representative for Toll Operations for positions in that department, and she is especially interested in convictions for theft, dishonesty and violence. She described the role of the CBRC as gathering facts and conveying the information that the candidate provides. Following the meeting, [REDACTED] drafts a memorandum explaining what the CBRC learned from the candidate. The draft memo is sent via e-mail to the other committee members for review and corrections, and in the past the final memo was sent to [REDACTED].

[REDACTED] was shown the materials from the CBRC file and recalled that the initial meeting with [REDACTED] [REDACTED] and [REDACTED] [REDACTED] had been cancelled because Ross was a no-show. At the rescheduled meeting, the panel consisted of herself, [REDACTED] [REDACTED] [REDACTED] [REDACTED] and [REDACTED] [REDACTED] recalled that Ross told the committee that she had no part in the crime and that she was charged because a gun was found in her house, but was allowed to plead to a lesser charge because she feared testifying against her cousin. [REDACTED] said that the committee did not challenge Ross' version of events, and that she did not recall ever being in a meeting where anyone on the committee has told the candidate "We don't think you are being truthful."

5. [REDACTED]

On December 14, 2016, an OIG Investigator spoke by telephone with [REDACTED], former [REDACTED] [REDACTED] about his involvement in the ARB assessment and recommendation respecting Ross. [REDACTED] recalled that "The facts looked puzzling" based upon the statements Ross made during the CBRC interview. [REDACTED] believed he requested ISP to do a more thorough background check on Ross, but he did not remember if he received a report from ISP. He explained that there might not have been any additional information obtained.

V. ANALYSIS

Ross sought employment as a Seasonal Toll Collector with the Tollway. After she was given a conditional offer of employment, she consented to a background check. When her criminal records check revealed a conviction, Ross provided a false explanation to the CBRC of her involvement in the crime, and gave unchallenged, self-serving explanations of her subsequent

⁸ On January 30, 2017, OIG investigators met personally with [REDACTED] and provided her non-union employee administrative advisements, orally and in writing, which she acknowledged understanding. Investigators asked [REDACTED] orally and in writing, for consent to audio record the interview. [REDACTED] consented to have the interview audio-recorded.

⁹ [REDACTED] is currently serving as Tollway's [REDACTED].

employment history. Because the CBRC did not have and did not obtain records about the incident or her past employment, the panelists had no way of confirming her story. In addition, because the criminal history records had been redacted, Ross was not asked about her other criminal history including a conviction on two felony counts of Misappropriation of Identity. Also, while the assessment favorably referenced Ross' subsequent employment history, her hiring file contains no record of any employment or reference verification from [REDACTED] or [REDACTED] [REDACTED] [REDACTED] so her claims that [REDACTED] knew of her conviction and hired her or that she successfully handled confidential information were never corroborated. As a direct consequence of this lack of factual information, the individualized assessment prescribed by Tollway policy¹⁰ was fundamentally incomplete and unreliable.

Based on the information conveyed by the CBRC, the ARB determined that the Attempt Robbery conviction was significant enough to find a nexus between Ross' criminal conduct and the Toll Collector responsibilities, but highlighted "mitigating factors" - such as: Ross' minimal participation in the crime, and her subsequent positive employment history including handling confidential records - in support of finding Ross eligible for hire. And the Executive Director relied on the ARB's determination, concurred with its recommendation, and approved Ross for hire. Unfortunately, the CBRC, the ARB, and the Executive Director did not know Ross' true involvement in the Attempt Robbery crime, and did not know she used confidential personal information of a client of one of her former employers to commit Misappropriation of Identity.

All of these facts were available or obtainable with further inquiry. While there may be nothing mandating such further inquiry, there appears to be marginal benefit to the Tollway of a background check process that simply asks candidates to confirm information they provided in their applications and to recount their version of past relevant events, without verifying or corroborating those statements.

VI. RECOMMENDATIONS

This investigation established, and Ross admitted, that she misled the Tollway's Criminal Background Review Committee by lying about the circumstances of her involvement in a crime that led to her conviction for Attempt Robbery/Party to a Crime. Had Ross not resigned, the OIG would have recommended that she be discharged. OIG recommends that Ross be considered ineligible for re-hire.

Furthermore, as detailed above, this investigation also revealed that important information necessary for the full and fair assessment of Ross' suitability for employment was not obtained or elicited in the background review process. Consequently, neither the CBRC, nor the ARB, nor the Executive Director had all relevant information before Ross was hired.

¹⁰ See Tollway Policies and Procedure Manual Ch. 2, Sec H.3 (Rev 9/1/2016).

OIG recommends the Tollway review the candidate background check process to determine if it ensures a fair and complete assessment of selected candidates' suitability for employment.

Specific areas to consider:

- Ensure coordinated and timely background checks of selected candidates that examine past employment, education, and relevant criminal and credit history, as appropriate for the position.
- Develop and implement a more extensive Authorization to Conduct Background Check form that includes a disclosure section for past addresses, names used, and convictions, and which explains the criminal background check process to selected candidates.
- Determine specific types of criminal offenses that may demonstrate unfitness based on the essential job requirements and duties of each position or class of positions.
- Establish a consistent protocol with ISP to enable the Tollway to receive or obtain all relevant criminal history information necessary for a fair and effective candidate assessment.
- Develop a process that requires the CBRC and ARB to verify candidate background information.