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ADMINISTRATIVE LAW

The newsletter of the ISBA's Section on Administrative Law

Inside

This is a very special issue of the Newsletter. As you can see, the first two articles concern ALJ, and very active Section Council member, Ann Breen-Greco. It is Ann's photograph, of course, that appears as well. Both articles and the photograph originally were published in the Fall 2007 issue of Chicago-Kent Magazine. Thanks very much to Chicago-Kent College of Law Dean Harold Krent for permission to republish the articles and the photograph.

The following two articles are by extremely talented third year law students, Seth Ellis who is in his third year at Northern Illinois University College of Law, and Peter Horst who is a 3L at DePaul University College of Law. Seth chose to write about the constitutionality of random, suspicion-less drug testing of employees in the public sector. Peter enlightens us concerning seemingly conflicting Illinois Appellate Court rulings in cases relating to the personnel records exemption set forth in the Illinois Freedom of Information Act.

Our final article this month is a synopsis of a presentation Cook County Circuit Court Judge Sophia Hall made to the Chicago Bar Association's Administrative Law Judges Committee. Her topic was how ALJs can gain and keep the respect of lawyers and parties.

Ann Breen-Greco, Chicago Kent College of Law '84, Administrative Law Judge

After working in private practice for five years, Judge Ann Breen-Greco '84 made the decision to parlay her legal experience and strong commitment to child welfare into the role of administrative law judge (ALJ), initially presiding over child welfare hearings with the Illinois Department of Children and Family Services.

"Child welfare is a difficult area of law because these cases typically involve physical or sexual abuse," she explains. "Often young children are not able or find it difficult to reveal what has occurred, and it is an especially difficult situation where those who are charged with abuse, even if the allegation is unfounded, are family members."

Currently an independent contractor with the Illinois State Board of Education, Judge Breen-Greco now presides over special education hearings issuing from the Individuals with Disabilities Education Act, which governs how states and public agencies provide educational and related services to millions of eligible children nationwide.

"The process requires first that parents and schools work together to find a solution to an alleged violation," Judge Breen-Greco explains. "If they fail, they are entitled to a hearing. First there is a pre-hearing by phone in which the issues and requested remedy are discussed. Because the hearings must be heard in the school district in which the alleged violation has occurred, I then travel to the school district to receive the evidence and hear testimony. After that I have 10 days to render my decision."

Judge Breen-Greco also has extensive experience as a mediator and arbitrator. Currently she conducts labor/management arbitration for the Federal Mediation and Conciliation Service and chaired the doping-review hearing officers committee of USA Track & Field.

IN THIS ISSUE

As a past president of the Illinois Association of Administrative Law Judges, Judge Breen-Greco believes it's important for people to know more about the administrative law judiciary and the extent of its role—one she describes as "equivalent to that of a trial judge without juries, and part of the executive branch of government.

Like many of her ALI colleagues, Judge Breen-Greco urges that Illinois join the nearly 30 states plus the cities of Chicago and New York and the District of Columbia that have adopted state central panels. Under this system, ALJs no longer work for specific state agencies; rather, they are employed by a single state hearing panel that assigns them to hear cases for a variety of state agencies.

"I am absolutely convinced that creating a central hearing panel is the most efficient way for the public to get the fairest hearings possible," she says. "While there is reluctance on the part of some agencies that fear the loss of staff and budget, a central panel is in the best interest of the public because it ensures there will not be even the appearance of impropriety or bias."

Illinois Association of Administrative Law Judges

A shared interest in heightening awareness of the administrative law judiciary has long connected Judges Ann Breen-Greco and Berta Requena, who first met at a meeting of the Illinois Judicial Council.

Their collaboration continued via their stewardship of the Illinois Association of Administrative Law Judges (IAALJ), with Judge Requena as immediate past president and Judge Breen-Greco as past president and board member. The state affiliate of the National Association of the Administrative Law Judiciary, IAALJ is a "not-for-profit organization dedicated to the highest standards of justice and public service by those presiding over administrative tribunals in Illinois."

Judges Requena and Breen-Greco both work through IAALJ to raise the visibility of the administrative law judiciary. "Creating recognition of the ALJ among other bar associations and the legal community is important, which is one reason I successfully negotiated with the Chicago Bar Association to reinstate the ALJ Committee within the CBA," Judge Requena says.

"It's also important for the public to know more about the administrative law judiciary, and to see their close connection to other judges," Judge Breen-Greco adds. "Given the number and variety of administrative appeals, people are more likely to have contact with an administrative law judge or hearing officer than with the court system."

In addition to pursuing Illinois' adoption of a central hearing panel, IAALJ provides professional camaraderie. "As a lot of judges will tell you, being a judge can be isolating," Judge Requena notes. "You can't interact with the public or with other attorneys in the same way as many others do. IAALJ gives us a place to interact and network with one another on issues of common interest and concern."

The Fourth Amendment and drug testing in the public employment sector: A review of *Krieg v. Seybold,* 481 F.3D 512 (7TH CIR. 2007)

By Seth L. Ellis

I. Introduction

The Fourth Amendment to the United States Constitution protects individuals from unreasonable searches conducted by the Government, including when the Government acts as an employer. In 1989, the Supreme Court of the United States held that random, suspicionless drug testing of government employees constitutes a "search" within the purview of the Fourth Amendment. Yet, the Court also ruled that random drug testing in the public employment sector is constitutional when a "special government need" is served and when the government's interest outweighs the employee's privacy interest, making it "impractical to require a warrant or some level of individualized suspicion in the particular context." *Nat'l Treasury Employees Union v. Von Raab*, 489 U.S. 656 (1989). Recently, the United States Court of Appeals for the Seventh Circuit reviewed the pertinent case law on random drug testing of public employees. In *Krieg v. Seybold*, 481 F.3d 512 (7th Cir. 2007), the Court had to determine whether a truck driver's Fourth Amendment rights were violated when his employer, a municipality, tried to subject him to a random suspicionless drug test.

II. Facts of the Case

In 1985, the City of Marion, Indiana employed Robert Krieg to work in its Streets and Sanitation Department. Krieg regularly operated a one-ton dump truck, a dump truck with a plow, a front end loader, and a backhoe for the City. He was unable, however, to operate some of the City's heavier equipment because he did not have a Commercial Drivers License (CDL). In operating the vehicles, Krieg was responsible for plowing snow, directing traffic, and filling potholes.

On October 28, 2002, the City and the American Federation of State, County and Municipal Employees Local No. 3063 (AFSCME), of which Krieg was a member, executed a collective bargaining agreement. The agreement stated that workers in Marion's Streets and Sanitation Department would be subject to random drug and alcohol testing so long as they were "safety sensitive employees." The City's personnel policies handbook defined the term "safety sensitive employee" as including "all positions which require an employee to operate a commercial motor vehicle and/or hold a commercial driver's license."

On October 28, 2004, the superintendent of Marion's Streets and Public Works Department notified all Streets and Sanitation Department employees that they would be subject to a drug test later that day. Krieg refused to submit to the drug test. Immediately, Krieg was terminated and ordered to leave the premises. On November 15, 2004, the Board of Public Works confirmed his dismissal.

Subsequently, Krieg and AFSCME brought suit under 42 U.S.C. § 1983 against the City, the superintendent, and Marion's mayor. Krieg averred that the drug testing policy, as applied to him, violated the Fourth and Fourteenth Amendments. The district court granted summary judgment in favor of defendants, and Krieg appealed, contending that that the City's drug testing policy as applied to non-CDL employees violated his rights.

III. Analysis

The Seventh Circuit Court of Appeals utilized a two-part analysis for determining the constitutionality of random suspicionless drug testing on public employees. If a court finds that the random drug test serves a "special government need," it must then balance the intrusion on the individual's Fourth Amendment interests with the drug test's promotion of a legitimate governmental interest.

On a "special government need," the U.S. Supreme Court held in *Von Raab* there is a need when the employee sought to be tested works in a "safety sensitive" position. The Supreme Court defined a safety sensitive position as one which has duties "fraught with such risks of injury to others" that even "a momentary lapse of attention" could have disastrous consequences. The Seventh Circuit noted that "heavy equipment operators, such as forklift operators, tractor operators, engineering operators, and crane operators" have all been held to be in safety sensitive positions due to "the threat to other persons in the area." By contrast, it said that elevator operators, sign painters, plumbers, and drivers of vans, shuttle buses, and passenger cars have all been found to be in non-safety sensitive positions.

The Seventh Circuit concluded that Krieg held a safety sensitive position. In support, it urged that Krieg operated a one-ton dump truck, a dump truck with a plow, a front end loader, and a backhoe in public areas close to pedestrians and other vehicles. Furthermore, the court noted that such machines were larger and more complex than vans, shuttle buses, and passenger cars.

Upon finding that the City of Marion had a special government need to compel random drug tests, the court next balanced the intrusion on Krieg's Fourth Amendment privacy interest against Marion's legitimate interests. In this balancing test, the court considered four factors: (1) the nature of the privacy interest upon which the drug test intrudes; (2) the character of the intrusion on the individual's privacy interest; (3) the nature and immediacy of the governmental concern; and, (4) the efficacy of the particular means used to address the special need.

On balance, the court concluded that Marion's interest in testing Krieg for drugs outweighed Krieg's Fourth Amendment privacy interest. On the first factor, the court concluded Krieg had a "diminished expectation of privacy" due to the fact that he had previously allowed himself to be tested for drugs during the course of his employment with the Streets and Sanitation

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Department. On the second factor, the court asserted that Marion strictly complied with its employee drug testing procedures because Krieg was indiscriminately selected on a random day. Turning to the "nature" aspect of the third factor, Krieg conceded that Marion had a compelling interest in ensuring that its employees who regularly operated large machines were not impaired by drugs or alcohol. On the "immediacy" aspect of the third factor, the court stated the U.S. Supreme Court has never mandated that a "particularized or pervasive drug problem" exist before a governmental unit could conduct suspicionless drug testing. Finally, on the fourth factor, the Seventh Circuit proclaimed that in order to have the power to subject its employees to random drug testing in the workplace, the City was not limited to simply observing its employees for suspicious behavior.

IV. Conclusion

Because the City had a special need to subject its employed truck drivers to random drug tests, and because the City's interest outweighed the employee's Fourth Amendment privacy interest, the Seventh Circuit upheld Marion's random suspicionless drug testing.

For other governmental units considering policies involving random employee drug testing, the *Krieg* precedent suggests there is less likely to be Fourth Amendment problems where: (1) the policies are announced in advance; (2) the policies are subject to collective bargaining rather than unilateral government action; (3) the policies clearly describe what types of employees may be tested; (4) the policies assure randomness in the selection of those tested without suspicion about drug use; and, (5) the policies seek to protect not only employees but also the public from significant bodily harm.

When testing is based on dangers from the use of motor vehicle or heavy-duty equipment, seemingly the more specialized the equipment, the more likely it is that the public employees who operate the equipment are in safety sensitive positions. When a unit of government seeks to conduct random drug tests on its employees who drive vans, cars, or shuttle buses, there may be Fourth Amendment problems even where there is a written drug testing policy, as the governmental unit might not be able to overcome the greater privacy expectations of the employees. Similarly, the privacy expectations of government employees who carry out their duties on horses, motorcycles, or bicycles may outweigh the government's need to conduct random, suspicionless testing.

The author is a third year law student at Northern Illinois University College of Law

District conflict over interpretation of Illinois FOIA?

By Peter Horst[1]

The Illinois Freedom of Information Act requires public bodies to disclose public records upon request, unless the information requested falls within a limited number of statutory exemptions. The scope of one of those exemptions, for the "personnel files and personal information [of public] employees, appointees, or elected officials," was the subject of a recent decision of the Third District Appellate Court, in *Reppert v. Southern Ill. Univ*., 2007 WL 2377368 (Aug. 15, 2007).[2] *Reppert* is interesting in part because the court's analysis of the personnel-file exemption would seem to be in considerable tension, if not outright conflict, with a 2005 decision of the Fourth District, *Copley Press v. Board of Education for Peoria S.D. No. 150*, 359 Ill.App.3d 321 (2005).

In March of 2006, the Anna Gazette-Democrat newspaper and its publisher, Jerry Reppert, filed a FOIA request with Southern Illinois University seeking disclosure of the employment contracts of SIU's Chancellor, two other University officers, and a visiting Professor. The Chancellor, Walter V. Wendler, denied this request as well as Reppert's subsequent administrative-level appeal. Reppert and the Gazette-Democrat, joined by the Southern Illinoisian newspaper, then filed suit in August of 2006 in Sangamon County Circuit Court seeking to compel disclosure. The circuit court granted SIU's motion for summary judgment, finding that the sought-after employment contracts were exempt from disclosure under the FOIA's personnel-file exemption, and Reppert appealed. The Third District Appellate Court reversed and remanded, finding that "the statutory definition of 'public records' includes the information contained in the employment contracts at issue," and thus, that the personnel-file exemption did not apply, despite the fact that the employment contracts at issue physically resided within the employees' personnel files. *Reppert* at *4.

Copley concerned a different type of document than did *Reppert*. In *Copley*, the Peoria School District 150's superintendent, Dr. Kay Royster, had been placed on paid administrative leave for part of the 2004-05 school year by the Board of Education, with an eye towards a buy-out of her contract. The Copley Press made a FOIA request for two of Royster's performance evaluations and a letter sent by the Board to Royster explaining its decision, but the Board denied the request on the grounds that the documents were part of Royster's personnel file. Copley won in the circuit court, which reasoned that the Board's explanation of its negative performance evaluation was "neither a 'personnel matter' nor 'personal information.'" *Copley* at 323. The Fourth District Court, however, reversed, finding Royster's performance-related documents subject to a per se personnel-file exemption.

So, *Reppert* found that employment contracts were not per se exempt under the FOIA, while *Copley* found that performance evaluations were exempt. Why the apparently contra-

dictory results? Despite the factual distinction that can be made between contracts and evaluations, the real tension between *Reppert* and *Copley* stems from their divergent readings of Section 7(1)(b) of the FOIA, against the background of the FOIA's definition of "public record." Section 7(1)(b) exempts from disclosure "[i]nformation that, if disclosed, would constitute a clearly unwarranted invasion of personal privacy [...]." The very next sentence contains an important qualification of the privacy criterion: "The disclosure of information that bears on the public duties of public employees and officials shall not be considered an invasion of personal privacy." However, this is followed immediately by a non-exclusive enumeration of the types of files and records that are to be specifically exempted. Section 7(1)(b)(ii) exempts "personnel files and personal information maintained with respect to employees, appointees or elected officials of any public body [...]." The question raised by *Reppert* and *Copley*, then, is which is to control, the qualifying language of § 7(1) (the "exception-to-the-exemption"), as in *Reppert*, or the explicit exemption of (7)(1)(b)(ii) itself, as in *Copley*? One might say that in answering this question, the *Reppert* and *Copley* courts grasped different ends of the same stick.

The *Reppert* court reached the result it did because it read the FOIA's statutory definition of the term "public record" broadly while reading Section 7(1)(b)(ii)'s personnel-file exemption narrowly. The court cited *Southern Illinoisan v. Illinois Dep't of Public Health*, 218 Ill.2d 390 (2006) for both propositions (i.e., "the FOIA is to be accorded 'liberal construction,'" *Southern Illinoisian*, 218 Ill.2d 390, 416, and "the exceptions to disclosure set forth in the FOIA are to be read narrowly so as not to defeat the FOIA's intended purpose," id).. The court announced two mutually-reinforcing holdings: first, that the employment contracts at issue are to be considered "public records" in the relevant sense; and, second, that "the individual contracts constitute 'information that bears on the public duties of public employees and officials' [that] as a matter of law, are not exempt from disclosure under section 7."

The court did not explicitly connect up the FOIA's definition of "public record" with the types of records at issue here (Section 2(c) reads: "[...] 'Public records' includes, but is expressly not limited to: [...] (vii) all information in any account, voucher, or contract dealing with the receipt or expenditure of public or other funds of public bodies; (viii) the names, salaries, titles, and dates of employment of all employees and officers of public bodies [...]."). The court in *Reppert* appears to support its position not so much by syllogism as by the accretion of suggestive detail: the court starts with the need to read the FOIA broadly and the exemptions narrowly in accordance with the Statute's purpose; continues by drawing attention to Section 7(1)'s qualifying language (italicizing this section of the statute in its decision); and ends by emphasizing the public body's burden to establish at the trial level that the information it seeks to withhold is exempt. *Reppert* at *3.

The *Reppert* court mentioned *Copley* only to dismiss it. "[T]he *Copley* court also stated as follows: 'Given its plain and ordinary meaning, a "personnel file" can reasonably be expected to include documents such as [...] an employment contract [and] disciplinary records.' We view the above-quoted language as broad dicta." *Reppert* at *4 (citation removed). Strictly speaking, Copley's inclusion of "employment contracts" in its roster of typical personnel-file contents would indeed seem to be dictum—it was not necessary to the decision of that case for the court to rule on whether or not employment contracts as a class are always properly included in a public employee's personnel file. ("*In this case*, however, the requested documents are precisely what one would expect to find in a personnel file and are thus per se exempt from disclosure." *Copley* at 325. emphasis added). However, this does not change the larger point that *Copley* stands for a very different reading of FOIA Section 7(1)(b) than does *Reppert*.

While the *Reppert* court started from a broad, inclusive definition of "public record" and worked downwards towards a narrow, qualified reading of the personnel-file exemption, the *Copley* court started from the other end, with a categorical, per se view of the personnel exemption. When it found that the evaluations in question fit within that category, its inquiry was at an end: "Here, since the requested documents fit within the personnel file exemption under section 7(b)(ii), they are per se exempt, whether or not they constitute an invasion of Royster's personal privacy." *Copley* at 324. This is where *Copley* is most incompatible with *Reppert*: the *Copley* court made quite plain that it did not consider the qualifying language of Section 7 (relied upon so heavily by the *Reppert* court) to be a free-floating, open-ended qualifier capable of trumping Section 7's explicit exemptions; rather, the exemption will always win under *Copley*. Because its starting point was different, it took an entirely different analytical route than *Reppert*. *Copley* was concerned only with demonstrating that Royster's evaluations were the sort that belong in a personnel file. In support of this point, the court cited a broad range of Illinois statutes dealing with subjects similar to the FOIA (e.g., the Personnel Records Review Act, 820 ILCS 40), an issue the *Reppert* court never addressed.

This distinction of analytical methods could potentially make all the difference in future appellate decisions concerning the FOIA's statutory exemptions. It's easy to imagine two courts using the differing approaches of *Reppert* and *Copley* to reach directly contradictory outcomes, rather than the indirectly contradictory results of these two cases. One appellate court could follow *Copley* and find as a matter of law that a given class of records is the sort that naturally belongs in public employee's personnel file, and thus find it categorically exempt from disclosure, while another appellate court could follow *Reppert* and find that that same class of records constitutes "information that bears on the public duties of public employees and officials" (FOIA Section 7(b)), and thus find it categorically non-exempt.

Should the tension between the *Reppert* and *Copley* approaches to the FOIA's personnel-file exemption persist in subsequent appellate case law, it would not be surprising to find the Illinois Supreme Court stepping in to provide explicit guidance.

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1. The author is a third-year student at DePaul University College of Law.

2. The Illinois FOIA is found at 5 ILCS § 140/1 et seq., and the personnel-file exemption at § 140/7(1)(b)(ii). Some facts recounted here were drawn from an August 23, 2006 *Southern Illinoisan* newspaper article, "Newspapers Sue SIUC, Hope To Obtain Contracts," available at <http://www.southernillinoisan.com/articles/2006/08/23/local/17318096.txt> (last accessed Nov. 14, 2007).

Judge Sophia Hall speaks to ALJs on how to gain and keep respect

By Paul E. Freehling

On November 5, 2007, Cook County Circuit Court Judge Sophia H. Hall spoke to the Chicago Bar Association Administrative Law Judges Committee on the important and challenging subject of ALJs gaining and keeping the respect of litigants and attorneys appearing before ALJs in administrative law proceedings. She divided her remarks into three parts: Whether ALJs are "real" judges, what litigants expect of ALJs, and advice to ALJs regarding being respectful as a prerequisite of being respected.

Judge Hall began by noting the similarities between court judges and ALJs. They all hear and decide motions, schedule and preside over adjudicatory and adversarial proceedings, and issue judgments. In addition, they share a common interest in judicial independence which means both making and being perceived as making fair and impartial decisions. However, court judges and ALJs have some dissimilarities. ALJs usually do not wear robes and often do not have courtrooms with a bench. Of course, ALJs never preside over jury trials. She observed that there are separate ABA conferences for court judges and for ALJs, and that some organizations of judges have not invited ALJs to join.

Judge Hall distributed a document entitled "Justice Through the Eyes of the Litigant" drawn in part from Judge Susan Snow's article in 69 Denver Univ. L. Rev. 713 (1992) entitled "The Judge as Healer: A Humanistic Perspective," and also drawn in part from an article by Professor Tom Tyler entitled "The Psychology of Disputant Concerns in Mediation" which appeared in Oct. 1987 Negotiation Journal. The document Judge Hall distributed states:

1. Litigants want to feel that they have an opportunity to participate.
2. Litigants want to be treated with dignity and respect.
3. Litigants expect the courts and court personnel to be neutral.
4. Litigants want to trust that the judge will be fair. Their trust is easily eroded.

Many litigants do not believe or assume that the judge will treat them in the manner above. The judge must earn their trust from the moment the judge appears in the courtroom. The litigants 'judge the judge' based on how the judge treats others in the courtroom.

If the litigant is a minority, and the judge fails to treat them in the manner [described above, the litigant may conclude that] the judge is biased.

So do not opine about your feelings and assumptions. Only talk about facts and the law.

Judge Hall offered some advice in order to maximize the likelihood that litigants and lawyers will respect the person and the decisions of ALJs:

1. Dress professionally so that the litigants' and lawyers' first perceptions are favorable.
2. Behave professionally, which means to adopt an air of formality. Even if a lawyer or litigant is someone whom the ALJ might call by a first name outside of the adjudicatory setting, use the last name during the administrative proceedings. Otherwise, litigants and attorneys who are not as familiar to the ALJ may perceive that the adverse party has an edge, and may wonder whether familiarity equates with partiality.
3. Never berate or denigrate. Once you say it, you can't take it back. Comment on behavior rather than the person. For instance, comment on the way people are being rude rather than telling them simply that they are rude. Examples of improper behavior that should not be tolerated are interrupting, shouting, and directing remarks to the adverse attorney or party rather than to the ALJ.
4. Be prepared for hearings. That way, there will be fewer instances of surprises. Moreover, if the ALJ has demonstrated well-preparedness but an unexpected event does arise, the ALJ will not sacrifice credibility when admitting that s/he does not know the answer to an unanticipated question.
5. Exercise patience. If the ALJ feels blood pressure rising or a sense of losing control, take a break and "reboot." Come back after the break and do not be reluctant to apologize for something improper that had been said by the ALJ in haste.

Judge Hall's final remarks were in response to questions from the audience. One point she made was an attorney's nastiness, in the form of pejorative adjectives, that appears in briefs or arguments not only is unpersuasive but actually may reflect a lack of substance in the attorney's case. An ALJ should not be reluctant, in an extreme instance, to ask that the attorney re-write an offensive brief and leave out the adjectives.

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