

Office of Inspector General
Chicago Park District
Will Fletcher, Inspector General

2016 FIRST QUARTER REPORT

Greetings,

I am pleased to present the Park District OIG's first quarterly report of 2016. Attached are summaries of the quarter's significant investigations and hiring compliance activities.

In the first quarter of 2016, the OIG hired an Assistant Compliance Officer to coordinate our employment monitoring duties under the Park District's Employment Plan. We also adopted an internal policy for more efficient deployment of Park District vehicles assigned to the OIG.

The OIG's goals for the second quarter of 2016 include the addition of a full-time investigator. We will also seek to acquire separate office space to further promote the OIG's mission of independence, bring our office into structural alignment with its peer agencies in Chicago, and strengthen the efficiency and quality of our operations.

Please contact our office at 312-742-3333 with any information relating to fraud, waste, abuse or inefficiency within the Chicago Park District.

Sincerely,

Will Fletcher
Inspector General

I. INVESTIGATIONS

A. REVIEW OF ALLEGATIONS MADE BY A PARK ADVISORY COUNCIL

In January 2016, a Chicago newspaper published an article in which members of a park advisory council made various claims against the Park District and the management at one of its parks. The council has donated funds to the park to pay for program fees for youth patrons who could not otherwise afford to pay. In the article, members of the council claimed that the Park District was “missing” a number of registration receipts that would account for the park’s expenditure of the donations. The members asserted that the Park District had pledged to give copies of the receipts to the council but had yet to do so. The article also reported that youth patrons had been turned away from the park for their inability to pay for program fees even though donated funds were available.

The investigation found no evidence that the Park District handled the council’s donations in a manner that was less than transparent, against the Park District’s rules and procedures, or inconsistent with the goal of the council’s donations. Further, there was no evidence that young patrons were denied from participating in the park’s programs because they could not afford the fees.

Contrary to claims made in the newspaper article, there was no evidence that the Park District stated that it would provide or that it had ever provided the council with copies of patron registration receipts as proof of how donations were spent. Instead, the Park District had historically given the council only summaries of its expenditures of donated funds. Therefore, the investigation showed that any implication that the Park District was “missing” certain receipts, simply because copies had not been provided to the council, was inaccurate.

The investigation also reflected that, with respect to the individual park advisory council at issue, the Park District has not enforced the provisions of the Park Advisory Council Guidelines despite indications that the council was not in full compliance with the Guidelines.

The OIG recommended that the Park District:

- Review of the council’s compliance with the Park Advisory Guidelines. Such a review would include an accounting of the council’s fundraising and fiscal management history; and
- Consider the appropriateness of providing the council with more detailed information about the expenditure of its donations (short of giving the council copies of individual patron receipts). In 2013, the Park District discontinued

the practice of giving the council the names of the participants who enrolled in the programs with the assistance of the council's donations, citing privacy concerns. The council has argued that, since that time, it has received insufficient information about how its donations were used. The council's point was arguable as the Park District always continued to provide the council with some enrollment data connected to the donations. However, the OIG recommended that management review the feasibility of providing more detailed information without compromising the personal information of youth patrons.

The Park District's responses to the recommendations are pending.

B. INAPPROPRIATE CONDUCT BY A PARK DISTRICT EMPLOYEE

An OIG investigation found that an off-duty Park District employee demonstrated inappropriate conduct when addressing a Park District lifeguard at a beach during the summer of 2015. The lifeguard immediately reported the incident to his/her supervisor and the Park District reviewed the allegations.

While the investigation was ongoing, the off-duty employee left Park District employment for other reasons. The OIG recommended that a copy of its report be placed in the employee's file in the event the employee applied for a position with the Park District in the future. The Park District followed the OIG's recommendation.

C. PREFERENTIAL TREATMENT AT WINTER PROGRAM REGISTRATION BY TWO EMPLOYEES OF A THIRD-PARTY OPERATOR

An OIG investigation found that two employees of a third-party operator of the Park District gave preferential treatment to a friend of one of the employees during open registration for the Winter 2016 season. While other patrons had waited several hours for class registration to open, the two employees arranged to have the friend arrive and be escorted to the front of the line just minutes before registration began. In doing so, the friend was one of the first patrons served although he/she had not waited in line like the others had done.

The two employees admitted to giving the friend preferential treatment. One of the employees stated that, had he/she known that escorting the friend to the front of the line would cause complaints, he/she would have removed a class seat from open registration altogether and given it to the friend. The other employee stated that he/she couldn't believe that anyone complained about what had happened, either.

The OIG recommended that the third-party operator take appropriate actions to ensure that employees who play direct or indirect roles in the administration of class

registrations do so fairly, in accordance with its rules, and without regard to personal relationships. In response, the third-party operator apologized for the incident and pledged to continue to educate and train its staff on the applicable policies and procedures. The operator also indicated that it would move more class offerings to online registration. Finally, the employee whose friend received preferential treatment apologized for the incident.

D. EMPLOYEE'S INDEBTEDNESS TO THE CITY

An OIG investigation discovered that a Chicago Park District Attendant had 18 unpaid tickets for parking and moving violations totaling approximately \$1,800. The earliest of the 18 tickets was issued on December 20, 2015 and the most recent was dated February 26, 2016.

The OIG recommended that the Park District:

- Take whatever disciplinary and/or remedial measures it found appropriate for the employee; and
- Monitor the employee's payment of the indebtedness to the City.

The Park District has indicated that it will follow the recommendations.

E. EMPLOYEE'S UNDISCLOSED FELONY CONVICTIONS

An OIG investigation into an unrelated matter discovered that a Park District employee had two undisclosed felony convictions while he/she was working for the Park District. The OIG reported the employee's convictions to management in April 2016 and recommended that it take whatever disciplinary measures the Park District considered appropriate.

The Park District's response to the recommendation is pending.

F. INVENTORY CHECKS OF GAME CONSOLES AT TWO PLAYGROUND PARKS

The OIG conducted inventory checks at two Park District playground parks. Specifically, the OIG sought to confirm that Sony PlayStation 4 gaming consoles were on site at each location. Park District purchasing records indicated that one console was bought for each of the parks.

The inventory checks confirmed that the gaming consoles were at the parks and kept in secure locations. Neither of the consoles, however, had been asset-tagged as Park District property. The supervisors at each of the playgrounds told the OIG that they were relatively new in their roles and were not familiar with the process of having Park District property asset-tagged.

After the OIG’s checks at the playgrounds, the supervisors promptly made arrangements with Facility Management to have the consoles as well as other property asset-tagged.

The OIG recommended that the Park District review its training of park supervisors to ensure that they are instructed to have valuable Park District property asset-tagged by the Facility Management team. The Park District has indicated that it will follow the recommendation.

II. 2016 INVESTIGATIONS INFORMATION

Investigations Caseload by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Cases Initiated	73				
Investigations Completed	66				
Cases Pending	33♦				

♦ Includes carry-over from previous quarter.

Nature of Allegations

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Abuse of Position	1				
Criminal Misconduct or Theft	3				
Discourteous Treatment	1				
Fraud	4				
Improper Political Activity	1				
Misuse of Park District Property	1				
Preferential Treatment	1				
Rule or Ordinance Violation	52				
Waste or Inefficiency	1				
Other (reviews, assists, verifications)	8				

Method of Contact for Investigations Initiated

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Hotline telephone	5				
Hotline email	4				
OIG-initiated	58				
Walk-in	6				

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Agents/Contractors	2				
Employees	68				
Officers/Managers	0				
Patrons	1				
Reviews/Inventory Checks	2				
Unknown Parties	0				
Other	0				

Cases Pending Over Six Months

Four

Reason

Complex investigation. Generally involve difficult issues or multiple subjects: 3

On Hold. Case held not to interfere with another ongoing investigation: 1

III. COMPLIANCE MONITORING ACTIVITY — FIRST QUARTER 2016

Under the Chicago Park District Employment Plan, the OIG reviews and monitors various aspects of the Park District’s hiring and assignment activities. The OIG reports on its compliance monitoring activities in each its quarterly reports.

A. HIRING OVERSIGHT INVESTIGATIONS

The OIG initiated and completed one hiring oversight investigation during the first quarter of 2016:

- The OIG investigated an allegation that a February 2015 job posting for a year-round engineer position was rigged to favor the applicant who was eventually awarded the job. The investigation concluded that there was no evidence of favoritism or that the hiring process for the position was flawed.

The candidate who was hired received “priority consideration” during the hiring process because of prior service as a seasonal employee for a certain number of months. The “priority consideration” criteria were expressly provided for in the applicable collective bargaining agreement. Therefore, what the complainant alleged was unfair preferential treatment was, in fact, a contractual provision that gave candidates with certain experience priority consideration when full-time employment opportunities became available.

Had the candidate with “priority consideration” not been offered the position, it would have been opened to the general candidate pool, which included the complainant.

B. MONITORING CONTACTS BY HIRING DEPARTMENTS

The OIG reviews all reported or discovered instances where hiring departments contacted Human Resources to lobby for or advocate on behalf of actual or potential applicants or bidders for positions that are covered by the Employment Plan or to

request that specific individuals be added to any referral or eligibility list for upcoming jobs at the Park District.

Human Resources did not report any contacts by hiring departments for the first quarter of 2016.

1. Review of Exempt List Modifications

The OIG reviews the Park District's adherence to exemption requirements and modifications to the list of positions that are Exempt from the Employment Plan procedures:

The following positions were **added** to the Exempt list in the first quarter of 2016:

- Director of Revenue
- Deputy Director of Revenue
- Assistant Director of Revenue

The following position was **removed** from the Exempt list in the first quarter of 2016:

- Director of Park Services

2. Review of Exempt Management Hires

The Park District placed employees in the following Exempt positions during the first quarter of 2016:

1. An employee was promoted to Chief Program Officer
2. An employee was promoted to Chief Administrative Officer
3. An employee was promoted to Director of Purchases
4. An employee was promoted to Director of Revenue
5. An employee was promoted to Deputy Director of Human Resources
6. An employee was promoted to Treasurer
7. An employee was promoted to Region Manager – South Region
8. Two employees were promoted to Area Manager – South Region
9. Two employees were promoted to Area Manager – Central Region
10. One employee was promoted to Area Manager – North Region

3. Review of Written Rationales

The OIG reviews written rationales when no consensus selection (no one from the approved candidate pool was selected) was reached during a consensus meeting.

The OIG did not receive any “no consensus” letters during the first quarter of 2016.

4. Review of Emergency Appointments

The OIG reviews circumstances and written justifications for any emergency hires made pursuant to the Personnel Rules of the Park District Code.

There were no emergency appointments in the first quarter of 2016.

5. Review of “Acting Up” Activity

The OIG reviews all circumstances where employees are “acting up” (performing all or substantially all of the duties of an employee in a higher-paid classification).

The Park District reported the following instances of employees “acting up” through the end of the first quarter of 2016:

- 25 employees “acting up” from Laborer to Labor Foreman.

C. COMPLIANCE MONITORING — AUDITS

1. Review of Notices of Job Opportunities

The OIG audits modifications to minimum requirements and screening and hiring criteria and modifications of class specifications, minimum requirements, or screening and hiring criteria.

During the first quarter of 2016, the OIG noted no compliance issues with the minimum requirements and other criteria related to posting of Notices and Job Opportunities.

2. Review of Qualified Applicants/Bidders Lists

The OIG audits the lists of applicants/bidders who meet the predetermined minimum qualifications for the position (as generated by Human Resources). For the first quarter of 2016, the OIG’s review of the lists of applicants/bidders for positions revealed no significant issues.

3. Review of Candidate Testing

No activity in the first quarter of 2016.

4. Review and Monitoring of Hiring Sequences

The OIG randomly monitored several hiring sequences in the first quarter of 2016 for the following positions:

- Arts Instructor
- Attendant
- Boxing Instructor
- Early Childhood Instructor
- Junior Tree Surgeon
- Laborer
- Labor Foreman
- Park Supervisor (3x)
- Physical Instructor
- Playground Supervisor
- Program Event Facilitator
- Program Specialist
- Project Manager
- Recreational Leader (2x)

The OIG's monitoring revealed no significant issues in the candidate selection and interview processes.

5. Arbitrations and Grievances

The OIG audits all arbitration and grievances involving hiring, promotions, transfers or involving allegations of unlawful political discrimination.

The Park District did not report any arbitrations or grievances in the first quarter of 2016.

2016 SECOND QUARTER REPORT

I. INVESTIGATIONS

A. PARK DISTRICT EMPLOYEE CONVICTED OF NUMEROUS OUT-OF-STATE CRIMES

An OIG investigation discovered that an Attendant, who was hired in April 2016 was convicted of multiple felonies and misdemeanors in another state. A criminal background check on the employee, conducted on behalf of the Park District by its third-party provider, appeared to search only for criminal history in the State of Illinois. Therefore, the results of the check found that the employee had no criminal history in the State of Illinois but did not discover that the employee had numerous convictions for offenses such as armed robbery, battery, bail jumping as well as other felonies and misdemeanors.

The OIG recommended that the Park District take whatever disciplinary measures it deemed necessary up to and including termination. The Park District terminated the employee.

B. RESIDENCY VIOLATIONS

1. *Security Guard Living in Highland Park*

An OIG investigation found that a Park District Security Guard lived in Highland Park, Illinois, in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The Security Guard resigned after the OIG attempted to interview him/her related to this investigation. Had the Security Guard not resigned, the OIG would have recommended the employee's termination.

2. *Special Recreation Employee Living in Bensenville*

An OIG investigation found that a Park District Special Recreation employee violated the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The Park District terminated the employee per the OIG's recommendation.

C. PARK’S PARTNERSHIP CREATED CONFLICT OF INTEREST CONCERNS

The OIG recommended that the Park District suspend a partnership agreement between one of its parks and a private, for-profit sports program owned by the park’s supervisor and coached by one of the park’s employees.

The investigation established that the Park District had approved of a partnership agreement with the sports program to run youth basketball and football programs at the northwest side park. As part of the agreement, the Park District pledged to contribute resources to the program in the form of facilities use at a discount and Park District staff time to coach and train the youth participants (each of whom paid the program hundreds of dollars to join). The program was 100% owned by the park’s supervisor. The owner/supervisor also hired one of the park’s recreational employees as a coach for the program’s fee-based basketball programs.

As a result of the partnership, patrons of the affected park complained that regular Park District activities (open gym time, etc.) were being squeezed out to accommodate the supervisor’s privately-owned sports program.

Based on the evidence revealed in the investigation, it appeared that the Park District personnel who approved the partnership overlooked the conflict of interest inherent in creating a scenario where a park supervisor was granted the authority and resources to operate his privately-owned sports program at the same park where he was responsible for the administration of Park District programs.

The OIG recommended that the Park District immediately suspend the partnership with the private sports program. The Park District followed the recommendation.

II. 2016 INVESTIGATIONS INFORMATION

Investigations Caseload by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Cases Initiated	73	75			
Investigations Completed	66	26			
Cases Pending	33♦	82♦			

♦ Includes carry-over from previous quarter.

Nature of Allegations

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Abuse of Position	1	-			
Criminal Misconduct or Theft	3	14			
Discourteous Treatment	1	1			
Fraud	4	18			
Improper Political Activity	1	-			
Misuse of Park District Property	1	4			
Preferential Treatment	1	-			
Rule or Ordinance Violation	52	32			
Waste or Inefficiency	1	1			
Other (reviews, assists, verifications)	8	5			

Method of Contact for Investigations Initiated

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Hotline telephone	5	6			
Hotline email	4	2			
OIG-initiated	58	66			
Walk-in	6	1			

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Agents/Contractors	2	2			
Employees	68	67			
Officers/Managers	0	1			
Patrons	1	-			
Reviews/Inventory Checks	2	1			
Unknown Parties	0	-			
Other	0	4			

Cases Pending Over Six Months

Four

Reason

Complex investigation. Generally involve difficult issues or multiple subjects: 3

On Hold. Case held not to interfere with another ongoing investigation: 1

III. COMPLIANCE MONITORING ACTIVITY — SECOND QUARTER 2016

Under the Chicago Park District Employment Plan, the OIG reviews and monitors various aspects of the Park District’s hiring and assignment activities. The OIG reports on its compliance monitoring activities in each its quarterly reports.

A. MONITORING CONTACTS BY HIRING DEPARTMENTS

The OIG reviews all reported or discovered instances where hiring departments contacted Human Resources to lobby for or advocate on behalf of actual or potential applicants or bidders for positions that are covered by the Employment Plan or to request that specific individuals be added to any referral or eligibility list for upcoming jobs at the Park District.

Human Resources did not report any contacts by hiring departments for the second quarter of 2016.

1. Review of Exempt List Modifications

The OIG reviews the Park District's adherence to exemption requirements and modifications to the list of positions that are Exempt from the Employment Plan procedures. There were no such modifications made during the second quarter of 2016.

2. Review of Exempt Management Hires

The Park District placed employees in the following Exempt positions during the second quarter of 2016:

1. Staff Assistant to the Chief Administrative Officer
2. Project Manager, Department of Natural Resources
3. Special Projects Facilitator, North Region Administration
4. Deputy Director of Purchases, Department of Purchasing
5. Legal Secretary, Department of Law

3. Review of Written Rationales

The OIG reviews written rationales when no consensus selection (no one from the approved candidate pool was selected) was reached during a consensus meeting.

The OIG did not receive any "no consensus" letters during the second quarter of 2016.

4. Review of Emergency Appointments

The OIG reviews circumstances and written justifications for any emergency hires made pursuant to the Personnel Rules of the Park District Code.

There were no emergency appointments in the second quarter of 2016.

5. Review of "Acting Up" Activity

The OIG reviews all circumstances where employees are "acting up" (performing all or substantially all of the duties of an employee in a higher-paid classification).

The Park District reported the following instances of employees "acting up" through the end of the second quarter of 2016:

- Three Gardeners were acting up
- 17 Laborers were acting up
- One Floricultural Worker acted up

- 107 Lifeguards were acting up as Senior Lifeguards for the summer

B. COMPLIANCE MONITORING — AUDITS

1. Review of Notices of Job Opportunities

The OIG audits modifications to minimum requirements and screening and hiring criteria and modifications of class specifications, minimum requirements, or screening and hiring criteria.

During the second quarter of 2016, the OIG noted no compliance issues with the minimum requirements and other criteria related to posting of Notices and Job Opportunities.

2. Review of Qualified Applicants/Bidders Lists

The OIG audits the lists of applicants/bidders who meet the predetermined minimum qualifications for the position (as generated by Human Resources). For the second quarter of 2016, the OIG's review of the lists of applicants/bidders for positions revealed no significant issues.

3. Review of Candidate Testing

No activity in the second quarter of 2016.

4. Arbitrations and Grievances

The OIG audits all arbitration and grievances involving hiring, promotions, transfers or involving allegations of unlawful political discrimination.

The Park District did not report any arbitrations or grievances in the second quarter of 2016.

2016 THIRD QUARTER REPORT

I. INVESTIGATIONS

A. CRIMINAL BACKGROUND CHECKS OF FIVE PARK DISTRICT EMPLOYEES

The OIG recommended that the Park District review the felony convictions of five employees who were apparently hired without the Park District's knowledge of their criminal backgrounds. The cases were not referred because of any complaints of misconduct against the employees. However, the Park District Code requires that management determine whether an employee's criminal conviction would negatively impact his/her ability to work at the Park District and it was not apparent from a review of personnel files that either the convictions of the five employees were known about or that such a determination had been made for any of them.

The OIG also recommended that the Park District review its policies and procedures regarding criminal background checks to determine whether they are adequate and to evaluate the performance and services of its third-party provider of criminal background checks and fingerprinting services.

Four of the five cases involved seasonal employees who had successfully passed a background screen when they were originally hired at the Park District but who later (sometimes years later) committed felonies. The fifth case was that of an employee who was hired from the start as a year-round employee.

Under the Park District's policy, a returning seasonal employee will not be the subject of another criminal background check unless there's been a break in the employee's service. For example, the Park District will order a criminal background check for a seasonal Lifeguard before the first summer he/she works. The Park District will not run another background check if the Lifeguard returns the next summer and for each consecutive summer he/she works thereafter. If the seasonal Lifeguard reapplies for employment after missing a summer, however, the Park District will order a new criminal background check.

Otherwise, the Park District relies on a system of continuous alerts from its third-party vendor for criminal background checks when an employee (seasonal or full-time) is convicted of a crime. The OIG's review, however, indicated that the Park District does not always have updated criminal histories, prompting the

recommendation to examine whether the method of continuous alerts is reliable and/or sufficient.

All seasonal employees must submit to a drug screen before starting work regardless of whether they were employed by the Park District in the previous summer.

The Chicago Park District Act (70 ILCS 1505/), an Illinois statute, requires the Park District to perform criminal background checks on all of its job applicants. Certain felonies enumerated in the statute automatically disqualify an applicant from employment. For convictions of other crimes, it's within the Park District's discretion to hire the applicant.

In cases where an employee or prospective employee has been convicted of a crime, the Park District Code of Conduct requires the Park District to assess whether the specific criminal conviction "would have a negative impact on the employee's qualification to serve in the employee's current job title."

A brief description of the cases:

1. A seasonal Laborer, was convicted in December 2015 of a class 3 felony charge for retail theft. Under the Park District's policy as described above, the Laborer, who was a returning seasonal employee, had last been the subject of a criminal background screen in March 2012 when initially hired by the Park District. At the time of the OIG's finding, the employee was serving probation for the conviction.
2. An Aquatics employee was hired as a seasonal employee in 2009 after a successful criminal background check. Two years later, in July 2011, he/she was convicted of class 2 felony robbery. The employee successfully completed a three-year probation term. The Park District hired the employee full-time in the spring of 2016 but without knowledge of the 2011 conviction.
3. A seasonal Laborer pled guilty to class 3 felony forgery in September 2015 and sentenced to a probation terms of 18 months. The employee returned to a seasonal position at the Park District in each consecutive year since 2009, which is when the Park District ran its most recent criminal background check.

For the three employees above, the OIG recommended that the Park District review the cases and determine whether, in each case, the conviction would have a negative impact on the employee's qualification to serve in their position. After the Park District's determination, each of the three employees continued their employment.

4. A seasonal Laborer pled guilty to misdemeanor DUI in March 2015 and sentenced to two years' probation. The employee had in 2008 been convicted of felony narcotics possession, one of the enumerated crimes in the Chicago Park District Act that automatically barred employment. The Park District pursued termination against the employee.
5. A full-time tradesperson pled guilty to a felony charge of manufacture or possession of cannabis in 2010 and satisfactorily completed probation in 2012. The Park District pursued termination against the employee.

B. RESIDENCY VIOLATIONS

1. Security Guard Living in Matteson, Illinois

An OIG investigation found that a Park District Security Guard lived in Matteson, Illinois, in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The Security Guard gave notification of his/her retirement after the OIG attempted to schedule an interview related to this investigation. Had the Security Guard not resigned, the OIG would have recommended the employee's termination.

2. Security Guard Living in Park Ridge, Illinois

An OIG investigation found that a Park District Security Guard lived in Park Ridge, Illinois, in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The Security Guard resigned the day after the OIG notified the employee to appear for an interview related to this investigation. Had the Security Guard not resigned, the OIG would have recommended the employee's termination.

3. Administrative Employee Living in Schaumburg, Illinois

An OIG investigation found that a Park District Administrative employee was living in Naperville, Illinois, in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence, interviews and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The employee was terminated based on the OIG's findings.

4. *Security Guard Living in Calumet Park, Illinois*

An OIG investigation found that a Park District Security Guard lived in Calumet Park, Illinois, in violation of the personnel rule that requires Park District employees to live within Chicago’s city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The Security Guard resigned after the OIG requested to schedule an interview related to this investigation. Had the Security Guard not resigned, the OIG would have recommended the employee’s termination.

II. 2016 INVESTIGATIONS INFORMATION

Investigations Caseload by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Cases Initiated	73	65	20		
Investigations Completed	66	26	40		
Cases Pending	33♦	72♦	52		

♦ Includes carry-over from previous quarter.

Nature of Allegations

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Abuse of Position	1	-	1		
Criminal Misconduct or Theft	3	14	1		
Discourteous Treatment	1	1	1		
Fraud	4	18	5		
Improper Political Activity	1	-	-		
Misuse of Park District Property	1	4	-		
Preferential Treatment	1	-	1		
Rule or Ordinance Violation	52	22	8		
Waste or Inefficiency	1	1	1		

Nature of Allegations

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Other (reviews, assists, verifications)	8	5	2		

Method of Contact for Investigations Initiated

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Hotline telephone	5	6	4		
Hotline email	4	2	3		
OIG-initiated	58	56	10		
Walk-in	6	1	3		

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Agents/Contractors	2	2	2		
Employees	68	57	15		
Officers/Managers	0	1	-		
Patrons	1	-	1		
Reviews/Inventory Checks	2	1	-		
Unknown Parties	0	-	2		
Other	0	4	-		

Cases Pending Over Six Months

Three

Reason

Complex investigation. Generally involve difficult issues or multiple subjects: 3

III. COMPLIANCE MONITORING ACTIVITY — THIRD QUARTER 2016

Under the Chicago Park District Employment Plan, the OIG reviews and monitors various aspects of the Park District's hiring and assignment activities. The OIG reports on its compliance monitoring activities in each its quarterly reports.

A. MONITORING CONTACTS BY HIRING DEPARTMENTS

The OIG reviews all reported or discovered instances where hiring departments contacted Human Resources to lobby for or advocate on behalf of actual or potential applicants or bidders for positions that are covered by the Employment Plan or to request that specific individuals be added to any referral or eligibility list for upcoming jobs at the Park District.

Human Resources did not report any contacts by hiring departments for the third quarter of 2016.

1. *Review of Exempt List Modifications*

The OIG reviews the Park District's adherence to exemption requirements and modifications to the list of positions that are Exempt from the Employment Plan procedures. There were no such modifications made during the third quarter of 2016.

2. *Review of Exempt Management Hires*

The Park District placed employees in the following Exempt positions during the third quarter of 2016:

1. Regional Security Manager
2. Area Manager – Department of Intergovernmental Affairs

3. *Review of Written Rationales*

The OIG reviews written rationales when no consensus selection (no one from the approved candidate pool was selected) was reached during a consensus meeting.

The OIG did not receive any “no consensus” letters during the third quarter of 2016.

4. Review of Emergency Appointments

The OIG reviews circumstances and written justifications for any emergency hires made pursuant to the Personnel Rules of the Park District Code.

There were no emergency appointments in the third quarter of 2016.

5. Review of “Acting Up” Activity

The OIG reviews all circumstances where employees are “acting up” (performing all or substantially all of the duties of an employee in a higher-paid classification).

The Park District reported the following instances of employees “acting up” through the end of the third quarter of 2016:

- Physical Instructor acting up as Park Supervisor

B. COMPLIANCE MONITORING — AUDITS

1. Review of Notices of Job Opportunities

The OIG audits modifications to minimum requirements and screening and hiring criteria and modifications of class specifications, minimum requirements, or screening and hiring criteria.

During the third quarter of 2016, the OIG noted no compliance issues with the minimum requirements and other criteria related to posting of Notices and Job Opportunities.

2. Review of Qualified Applicants/Bidders Lists

The OIG audits the lists of applicants/bidders who meet the predetermined minimum qualifications for the position (as generated by Human Resources). For the third quarter of 2016, the OIG’s review of the lists of applicants/bidders for positions revealed no significant issues.

3. Review of Candidate Testing

No activity in the third quarter of 2016.

4. Arbitrations and Grievances

The OIG audits all arbitration and grievances involving hiring, promotions, transfers or involving allegations of unlawful political discrimination.

The Park District did not report any arbitrations or grievances in the third quarter of 2016.

2016 FOURTH QUARTER REPORT

I. INVESTIGATIONS

A. EMPLOYEE INDEBTEDNESS TO THE CITY OF CHICAGO

In the fourth quarter of 2016, the OIG initiated a review of Park District employee indebtedness to the City of Chicago. It is a violation of the Park District employee Code of Conduct to have outstanding debts to the City (water bills, speeding tickets, parking violations, etc.). The review targeted final adjudicated debts (as distinct from newer fines or tickets that were still contestable).

According to City of Chicago records, Park District employees collectively owed \$263,000 in outstanding debts to the City. Of that amount, \$116,000 was attributable to approximately 135 former and seasonal employees, leaving \$147,000 owed by nearly 250 current employees. Some employees owed the City as much as \$10,000 and had had their debts for several years.

Working with the Office of the Chief Administrative Officer and the Department of Human Resources, the OIG notified the current employees (in mid-December 2016) by certified mail or in-person delivery with directions to resolve their indebtedness (through payment in total, enrollment in a payment plan, etc.) by mid-January 2017 or be subject to disciplinary action.

By the end of 2016, 26 employees had come into compliance by paying or paying down their debts to the City.

B. RESIDENCY VIOLATIONS

1. *Activities Instructor Living in Palos Park, Illinois*

An OIG investigation found that a Park District Activities Instructor lived in Palos Park, Illinois in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

During the investigation, the Activities Instructor was terminated from Park for being absent from work without permission.

2. Security Guard Living in Naperville, Illinois

An OIG investigation found that a Park District Security Guard lived in Naperville, Illinois in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The Security Guard resigned two days after the OIG notified the employee to appear for an interview related to this investigation. Had the Security Guard not resigned, the OIG would have recommended the employee's termination.

3. Activities Instructor Living in South Holland, Illinois

An OIG investigation found that a Park District Activities Instructor lived in South Holland, Illinois in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The Activities Instructor resigned two weeks after the OIG first attempted to schedule an interview with the employee related to this investigation. Had the Activities Instructor not resigned, the OIG would have recommended the employee's termination.

4. Security Guard Living in Elmwood Park, Illinois

An OIG investigation found that a Park District Security Guard lived in Elmwood Park, Illinois in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances during the investigation established that the employee lived outside of Chicago.

The Security Guard resigned on the day that the OIG notified the employee to appear for an interview related to this investigation. Had the Security Guard not resigned, the OIG would have recommended the employee's termination.

II. 2016 INVESTIGATIONS INFORMATION

Investigations Caseload by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Cases Initiated	73	65	20	264	422
Investigations Completed	66	26	40	47	179
Cases Pending	33♦	72♦	52♦	269♦	269

♦ Includes carry-over from previous quarter.

Nature of Allegations

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Abuse of Position	1	-	1	-	2
Criminal Misconduct or Theft	3	14	1	1	19
Discourteous Treatment	1	1	1	-	3
Fraud	4	18	5	2	29
Improper Political Activity	1	-	-	-	1
Misuse of Park District Property	1	4	-	1	6
Preferential Treatment	1	-	1	1	3
Rule or Ordinance Violation	52	22	8	252	334
Waste or Inefficiency	1	1	1	-	3
Other (reviews, assists, verifications)	8	5	2	7	22

Method of Contact for Investigations Initiated

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Hotline telephone	5	6	4	1	16
Hotline email	4	2	3	5	14

Method of Contact for Investigations Initiated

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
OIG-initiated	58	56	10	256	380
Walk-in	6	1	3	2	12

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Agents/Contractors	2	2	2	3	9
Employees	68	57	15	258	398
Officers/Managers	0	1	-	-	1
Patrons	1	-	1	1	3
Reviews/Inventory Checks	2	1	-	-	3
Unknown Parties	0	-	2	1	3
Other	0	4	-	1	5

Cases Pending Over Six Months

Four

Reason

Complex investigation. Generally involve difficult issues or multiple subjects: 2

Available Time and Resources: 1

Pending a Criminal Investigation by Law Enforcement: 1

III. COMPLIANCE MONITORING ACTIVITY — FOURTH QUARTER 2016

Under the Chicago Park District Employment Plan, the OIG reviews and monitors various aspects of the Park District’s hiring and assignment activities. The OIG reports on its compliance monitoring activities in each its quarterly reports.

A. MONITORING CONTACTS BY HIRING DEPARTMENTS

The OIG reviews all reported or discovered instances where hiring departments contacted Human Resources to lobby for or advocate on behalf of actual or potential applicants or bidders for positions that are covered by the Employment Plan or to request that specific individuals be added to any referral or eligibility list for upcoming jobs at the Park District.

Human Resources did not report any contacts by hiring departments for the fourth quarter of 2016.

1. Review of Exempt List Modifications

The OIG reviews the Park District's adherence to exemption requirements and modifications to the list of positions that are Exempt from the Employment Plan procedures. There were no such modifications made during the fourth quarter of 2016.

2. Review of Exempt Management Hires

The Park District placed employees in the following Exempt positions during the fourth quarter of 2016:

- Information Technology Manager

Further, the OIG noted that a recently-hired Park District Area Manager did not submit all of the background materials required for the position. Although the Area Manager position is Exempt from the Employment Plan, the Plan still requires employees placed in Exempt positions to submit certain materials and documents.

The employee promptly submitted the materials for his/her personnel file.

3. Review of Written Rationales

The OIG reviews written rationales when no consensus selection (no one from the approved candidate pool was selected) was reached during a consensus meeting.

The OIG did not receive any "no consensus" letters during the fourth quarter of 2016.

4. Review of Emergency Appointments

The OIG reviews circumstances and written justifications for any emergency hires made pursuant to the Personnel Rules of the Park District Code.

There were no emergency appointments in the fourth quarter of 2016.

5. Review of “Acting Up” Activity

The OIG reviews all circumstances where employees are “acting up” (performing all or substantially all of the duties of an employee in a higher-paid classification).

The Park District reported the following instances of employees “acting up” through the end of the fourth quarter of 2016:

- Physical Instructor acting up as Park Supervisor

B. COMPLIANCE MONITORING — AUDITS

1. Review of Notices of Job Opportunities

The OIG audits modifications to minimum requirements and screening and hiring criteria and modifications of class specifications, minimum requirements, or screening and hiring criteria.

During the fourth quarter of 2016, the OIG noted no compliance issues with the minimum requirements and other criteria related to posting of Notices and Job Opportunities.

2. Review of Qualified Applicants/Bidders Lists

The OIG audits the lists of applicants/bidders who meet the predetermined minimum qualifications for the position (as generated by Human Resources). For the fourth quarter of 2016, the OIG’s review of the lists of applicants/bidders for positions revealed no significant issues.

3. Review of Candidate Testing

No activity in the fourth quarter of 2016.

4. Arbitrations and Grievances

The OIG audits all arbitration and grievances involving hiring, promotions, transfers or involving allegations of unlawful political discrimination.

The Park District did not report any arbitrations or grievances in the fourth quarter of 2016.