

2017 FIRST QUARTER REPORT

I. INVESTIGATIONS

A. EMPLOYEE ARRESTED FOR VIOLATING TERMS OF DUI ARREST DRIVING FOR WORK ON SUSPENDED LICENSE

An OIG investigation established that an inspector was driving for work every day for more than a year on a suspended driver's license. The suspension of the employee's driver's license was the result of two separate arrests: the first for DUI and the second arrest for operating a motor vehicle that was not equipped with a breathalyzer unit as required by court order.

The employee received mileage reimbursement totaling \$5,000 during the period when the employee's driver's license was suspended. The employee also made false statements by attesting that he/she "held a valid Illinois driver's license" on each of the mileage reimbursement forms submitted for payment.

The OIG recommended that the Park District take disciplinary action up to and including the termination of the inspector's employment. The employee was terminated.

B. ONGOING: PARK DISTRICT EMPLOYEE INDEBTEDNESS TO THE CITY OF CHICAGO

The OIG's 2016 Fourth Quarter Report highlighted an ongoing review of Park District employee indebtedness to the City of Chicago. It is a violation of the Park District employee rules to have unresolved final debts to the City. The Report noted that, collectively, Park District employees owed the City \$263,000 in outstanding debts. Of that amount, \$116,000 was attributable to approximately 135 former and seasonal employees and \$147,000 was owed by nearly 250 current employees. The employees were notified of the indebtedness and provided directions on how to come into compliance. By the end of the 2016, 26 employees had paid their debts in full, entered into a payment plan, or demonstrated proof that the debts had been discharged.

In the first quarter of 2017, an additional 113 employees showed proof of compliance. The OIG recommended that the Park District initiate disciplinary proceedings or

monitor the compliance of 29 employees who had not paid the debts and who provided no indication that they were addressing them.

The OIG was in the process of confirming the status of the debts of the remaining employees.

C. REVIEW OF PARK DISTRICT VOLUNTEERS

As part of its screening of volunteer applications, the Park District checks the applicants' names against the Illinois Sex Offender Registry. In the first quarter of 2017, the OIG conducted a review of all current Park District volunteers against the Registry and found no matches.

D. RESIDENCY VIOLATION: PARK DISTRICT SECURITY EMPLOYEE LIVING IN ELMWOOD PARK

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

The Security employee resigned under investigation. Had the employee not resigned, the OIG would have recommended termination.

II. 2017 CASELOAD INFORMATION

Investigations by Quarter					
	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	22				
Closed	140				
Pending	151♦				

♦ Includes carry-over from previous quarter.

Reviews by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	4				
Closed	1				
Pending	4♦				

♦ Includes carry-over from previous quarter.

Nature of Investigations and Reviews Initiated by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Criminal Misconduct or Fraud	4				
Waste and Inefficiency	4				
Other Rule, Code, Ordinance Violations	18				

Audits by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	3				
Closed	2				
Pending	3♦				

♦ Includes carry-over from previous quarter.

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Officers	0				
Employees	3				
Other (Agents, concessionaires contractors, other parties)	19				

Cases Pending Over Six Months

[9]

Reasons

Complex investigation that generally involve difficult issues or multiple subjects: [5]

On hold pending a criminal investigation: [1]

Available time & resources: [3]

III. COMPLIANCE MONITORING ACTIVITY — FIRST QUARTER 2017

In 2015, the Park District was released from a federal court consent decree that covered its hiring policies and procedures because of historical political patronage hiring practices. As one of the conditions of release from the consent decree, the Park District created an Employment Plan that introduced new rules and procedures related to hiring and employment decisions. As Hiring Monitor, the OIG reviews and monitors the Park District’s compliance with the Employment Plan on a regular basis. 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 in the first quarter of 2017.

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 Exempt List Modifications made during the first quarter of 2017.

2. Review of Exempt Management Hires

The Park District placed employees in the following Exempt positions during the first quarter of 2017:

1. Director of IT
2. IT Manager
3. 2 Area Managers
4. Deputy Director of Budget

3. Review of Written Rationales

The OIG reviews written "no consensus" rationales when no one from the approved candidate pool was selected during a hiring round.

The OIG reviewed one no consensus rationale during the first quarter of 2017 for the Senior Budget Analyst position.

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 2017.

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 2017:

- Physical Instructor acting up as Park Supervisor
- IT Manager acting up as Director of IT

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 first quarter of 2017, 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 2017, 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 2017.

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 first quarter of 2017.

2017 SECOND QUARTER REPORT

I. INVESTIGATIONS

A. EMPLOYEE CLAIMED SICK TIME WHILE IN JAIL AND ON ELECTRONIC MONITORING; VIOLATED RESIDENCY REQUIREMENT; HAD NO JOB DUTIES

An OIG investigation established that an employee lived outside of Chicago in violation of the requirement that all employees must reside within the City limits. Multiple surveillances and documentary evidence showed that the employee lived in a house in McHenry County.

Separately, the investigation established that the employee falsely claimed sick leave following an arrest for retail theft. On the dates that the employee claimed sick leave, criminal court records indicated that he/she was either in jail, wearing an electronic monitoring device, or in court as a defendant in the criminal case resulting from the arrest.

The investigation also determined that the employee had no real job duties to speak of, much less anything that would benefit the \$90,000 salary that the employee was paid. The employee was given some research assignments when first hired, but soon fell out of favor with his/her supervisors. Eventually, the employee had no supervisor and sat at a desk at the rear entrance of a Park District building, occasionally serving as a greeter.

The OIG recommended termination of the employee. The Park District followed the recommendation.

B. POTENTIAL CONFLICTS OF INTEREST NOTED IN PARK DISTRICT AGREEMENTS INVOLVING A NONPROFIT ENTITY

The OIG reviewed agreements involving the Park District and a nonprofit entity led by a senior Park District official. While the review concluded that there was no evidence that the senior official intentionally misused his/her position for unfair benefit, the senior official and the Park District demonstrated a lack of due diligence to address or acknowledge apparent conflict of interest issues that were manifest from the start of the senior official's tenure with the Park District. The OIG's investigation included the following findings:

- A use and occupancy agreement between the Park District and the official contains a clause that appears to apply to the official and which prohibits a person in that title from having “any financial or ownership interest, direct or indirect” in the agreement. The official, who draws a salary from the nonprofit, told the OIG that he/she signed the contract without even reading it because the nonprofit previously had an identical agreement in place before he/she held a position with the Park District. When the agreement was up for renewal, the Park District failed to recognize the significance of the clause;
- The Park District had not been reviewing or approving fees that the nonprofit was charging the public as required under the use and occupancy agreement;
- The senior official supported the Park District awarding new business to a contractor worth up to \$2 million. The winning contractor firm, however, also uses the nonprofit as a subcontractor for work on another Park District contract and pays it more than \$50,000 annually;
- The Park District contracts prohibit a person holding the official’s title from having “any financial or economic interest, direct or indirect, in ... any subcontract.” This called into question whether the nonprofit can legitimately subcontract work on a Park District contract given that the nonprofit pays the official a salary. Also, the Park District Code appears to require a person in the official’s title to publicly disclose the nonprofit’s relationship with the prime contractor firm;
- The senior official’s nonprofit has operated another project in Park District space since 2006. However, the use and occupancy agreement for that space expired in 2012, meaning that the nonprofit operates without a current agreement in place; and
- The occupancy agreements require the nonprofit to provide the Park District with the names and addresses of its staff members who participate in youth programming. However, the investigation showed that the Park District had not enforced the provision and apparently did not have the nonprofit’s personnel information.

The OIG recommended that the Park District seek the Ethics Officer’s opinion on the findings outlined above. Further, the OIG recommended that the Park District: retain the “no conflicts” language in any upcoming agreements between the nonprofit and the Park District, start to review and give written approval to any fees that the nonprofit charges the public, execute a new occupancy agreement to replace the expired contract at the nonprofit’s second site, expand the occupancy agreements to

permit the Park District to inspect the nonprofit's financial records as it relates to the agreement, to review the prime contractor firm's own compliance with the terms of its contract and the Park District Code, administer ethics training on a regular basis to ensure that senior officials are aware of their responsibilities related to conflicts of interest, and to evaluate the senior official's continued service in light of the findings.

The OIG's findings and recommendations are under consideration.

C. THE HIRING OF FIVE EMPLOYEES WITH SUBURBAN HOME ADDRESSES IN THEIR APPLICATION MATERIALS

As part of its screening of recent hires, the OIG found that five part-time employees were hired even though documents in their application and new employee materials revealed that they lived outside of the City. The employees were hired during a joint initiative between the Park District and the Chicago Public Schools.

The review found that, because of the joint initiative, the Park District processed a large number of new hires in a short amount of time and adopted ad hoc processes to bring the employees on board. Therefore, the residency issues with each of the five employees were not flagged as they would have been under normal hiring procedures.

The OIG recommended that the employees be terminated and that the Park District adopt procedures to maintain the integrity of applicant screening during hiring for joint initiatives in the future. The Park District terminated the employees and will enact sufficient measures for screening applications.

D. SOCIAL MEDIA POST DEPICTED LIFEGUARD WITH ALCOHOL AT WORK

An OIG investigation found that a Park District Lifeguard was in possession of alcohol at an indoor Park District pool. An Instagram post depicted the lifeguard pouring from a bottle of sparkling wine into a plastic cup. Park District employee rules prohibit the possession of alcohol at work.

The OIG recommended discipline up to and including the Lifeguard's termination. The Park District terminated the employee.

II. 2017 CASELOAD INFORMATION

Investigations by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	22	93			
Closed	140	63			
Pending	151♦	181			

♦ Includes carry-over from previous quarter.

Reviews by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	4	0			
Closed	1	3			
Pending	4♦	1			

♦ Includes carry-over from previous quarter.

Nature of Investigations and Reviews Initiated by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Criminal Misconduct or Fraud	4	4			
Waste and Inefficiency	2	3			
Other Rule, Code, Ordinance Violations	18	86			

Audits by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	3	6			
Closed	2	6			
Pending	3♦	3			

♦ Includes carry-over from previous quarter.

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Officers	0	0			
Employees	3	7			
Other (Agents, concessionaires contractors, other parties)	19	86			

Cases Pending Over Six Months

[3]

Reason

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

On hold pending a criminal investigation: [0]

Available time & resources: [1]

III. COMPLIANCE MONITORING ACTIVITY — SECOND QUARTER 2017

In 2015, the Park District was released from a federal court consent decree that covered its hiring policies and procedures because of historical political patronage hiring practices. As one of the conditions of release from the consent decree, the Park District created an Employment Plan that introduced new rules and procedures related to hiring and employment decisions. As Hiring Monitor, the OIG reviews and

monitors the Park District's compliance with the Employment Plan on a regular basis. 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 2017.

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 2017.

2. Review of Exempt Management Hires

The Park District placed employees in the following Exempt positions during the second quarter of 2017:

1. Human Resources Manager
2. Deputy Director of IT

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 2017.

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 2017.

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 2017:

- Physical Instructor acting up as Park Supervisor
- Security Guard acting up as Security Supervisor
- Labor Foreman acting up as Park Operations Supervisor
- 2 Floriculturists acting up as Floriculture Foremen
- Natural Areas Worker acting up as Natural Areas Technician
- 5 Natatorium Instructors acting up as Area Managers

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 2017, 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).

The OIG verified the educational and work backgrounds of three employees hired during the second quarter of 2017.

3. Interview Monitoring and Candidate Testing

During the second quarter of 2017, the OIG monitored job interviews for the Project Manager of Capital Construction position.

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 2017.

2017 THIRD QUARTER REPORT

I. OIG AND PURCHASING COORDINATE TO ENHANCE REVIEW OF POTENTIAL VENDORS

Before each monthly Park District Board of Commissioners meeting, OIG reviews prospective vendors, contractors and their principals to ensure that the firms comply with municipal laws and are in good standing with the City of Chicago and its sister agencies. OIG also attempts to determine that the firms are in good financial health and capable of performing the work for which they have bid.

In the past, OIG has learned of issues with the bidding firms (e.g., tax liens, levies, past due fines and other indebtedness) within just a few days of the Board meetings, which has prompted last-minute changes to the meeting agendas and delays for the purchase approvals of goods and services needed by user departments.

OIG and the Department of Purchasing have worked together to spot potential problems with prospective firms earlier in the procurement process. Specifically, OIG now has better access to what procurement matters are in the pipeline for Board approval. In addition, OIG has conducted training sessions of Purchasing staff on how to review potential red flag issues with the companies that seek Park District business. As a result, Purchasing and OIG have real-time discussions about issues as they are detected and determinations about whether to recommend certain firms for Board approval are made more deliberately and in a timelier manner.

II. INVESTIGATIONS

A. PARK DISTRICT EMPLOYEE INVOLVED IN PUBLIC HOUSING FRAUD IN IOWA

An OIG investigation established that a Special Recreation Leader committed federal fraud to obtain public housing assistance in the state of Iowa. The individual received federal housing assistance for an apartment in northwest Iowa at the same time that she was a Park District employee. The employee under-stated her income to the Iowa housing authority by not disclosing her Park District income.

The employee was also subject to two opposing residency requirements: the individual was required to live in the Iowa apartment to qualify for the housing subsidy but also required to live in Chicago to work for the Park District. Not

surprisingly, the employee gave OIG inconsistent and incoherent statements that tried to explain how he/she lived in both places at the same time.

The Iowa housing authority determined that the employee fraudulently obtained federal housing benefits by making false statements and moved to terminate the subsidy. Based on that finding, OIG recommended the employee's termination. The Park District followed the recommendation.

B. CRIMINAL MISCONDUCT: ATTENDANT CONVICTED OF MAIL FRAUD

A Park District Attendant pled guilty to one count of federal mail fraud (18 U.S.C. 1341) and sentenced to 68 months in federal prison. OIG determined that the employee's criminal misconduct did not involve the Park District. The Park District formally terminated the employee.

C. CRIMINAL MISCONDUCT: PATRON'S INAPPROPRIATE CONTACT WITH CHILDREN PROMPTED ARREST

A parent of a child in a Park District summer program was arrested after he was seen tickling other children and dousing water on them. The parent was immediately arrested and is prohibited from coming to the park.

D. NON-CITY BOAT OWNERS PAYING CITY RESIDENT HARBOR FEES

An OIG investigation at two Chicago harbors revealed the widespread practice of non-City residents submitting false, deceptive or out-of-date paperwork and identification to obtain the Chicago resident discount for mooring fees. OIG forwarded the names to its third-party harbor manager for collection of the non-resident fee. OIG learned that the manager collected non-resident payments in just a handful of cases.

II. 2017 CASELOAD INFORMATION

Investigations by Quarter					
	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	22	93	85		
Closed	140	63	60		
Pending	151♦	181	206		

♦ Includes carry-over from previous quarter.

Reviews by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	4	0	5		
Closed	1	3	6		
Pending	4♦	1	0		

♦ Includes carry-over from previous quarter.

Nature of Investigations and Reviews Initiated by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Criminal Misconduct or Fraud	4	4	3		
Waste and Inefficiency	2	3	5		
Other Rule, Code, Ordinance Violations	18	86	82		

Audits by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	3	6	2		
Closed	2	6	3		
Pending	3♦	3	2		

♦ Includes carry-over from previous quarter.

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Officers	0	0	0		
Employees	3	7	3		

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Other (Agents, concessionaires, contractors, other parties, unknown)	19	86	82		

Cases Pending Over Six Months

[5]

Reason

Complex investigation. Generally involve difficult issues or multiple subjects: [5]

III. COMPLIANCE MONITORING ACTIVITY — THIRD QUARTER 2017

Under the Chicago Park District Employment Plan, OIG reviews and monitors the Park District’s hiring and assignment determinations to ensure that impermissible political factors have not played a role. OIG reports on its compliance monitoring activities in each its quarterly reports.

A. MONITORING CONTACTS BY HIRING DEPARTMENTS

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 2017.

1. Review of Exempt List Modifications

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 2017.

2. Review of Exempt Management Hires

The Park District reported no Exempt hires made during the third quarter of 2017.

1. Review of Written Rationales

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

Human Resources did not submit any “no consensus” letters during the third quarter of 2017.

2. Review of Emergency Appointments

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

Human Resources reported no emergency appointments in the third quarter of 2017.

3. Review of “Acting Up” Activity

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).

Human Resources reported that a Physical Instructor was acting up as Park Supervisor during the third quarter of 2017.

B. COMPLIANCE HIRING MONITORING AND AUDITS OF PREVIOUS QTR. (2Q 2017)

OIG conducts audit sampling of the Park District’s hiring activity from the previous quarter.

1. Review of Notices of Job Opportunities

OIG audits modifications to minimum requirements and screening and hiring criteria and modifications of class specifications, minimum requirements, or screening and hiring criteria. OIG found no compliance issues with the minimum requirements and other criteria related to posting of Notices and Job Opportunities during 2Q ‘17.

2. Review of Qualified Applicants/Bidders Lists

OIG audits the lists of applicants/bidders who meet the predetermined minimum qualifications for the position (as generated by Human Resources). For 2Q ‘17, OIG’s review of the lists of applicants/bidders for positions revealed no significant issues.

3. Review of Candidate Testing

OIG found no issues related to testing of Park District job candidates in 2Q ‘17.

C. ARBITRATIONS AND GRIEVANCES

OIG audits all arbitration and grievances involving hiring, promotions, transfers or involving allegations of unlawful political discrimination. Human Resources did not report any arbitrations or grievances in the third quarter of 2017.

D. EMPLOYMENT AND EDUCATIONAL VERIFICATIONS REVEALED NO ISSUES

As an extension of its compliance audits, OIG confirms the previous employment and educational backgrounds of selected new employees. During the third quarter of 2017, OIG confirmed the employment and educational backgrounds for three new hires.

2017 FOURTH QUARTER REPORT

I. COMPLETED INVESTIGATIONS

A. RECREATION LEADER'S USE OF SOCIAL MEDIA PROMPTED A RECOMMENDATION FOR DEPARTMENT-WIDE POLICY AND TRAINING

OIG received a complaint from the parents of children enrolled in a class taught by a Recreation Leader. The parents complained that the Recreation Leader took video of the children in the class with his/her smartphone and then posted the video on social media. The Park Supervisor had been notified about the incident and had already admonished the employee and submitted an incident report.

The investigation exposed that the Park District trained some but not all employees not to take pictures or video of patrons at all and specifically prohibits posting any images on social media. OIG recommended that the Park District apply the training to all employees and make it formal policy.

The Park District responded that it would follow the recommendation. OIG will follow-up to confirm that the training and policy are in place.

B. RESIDENCY VIOLATION: EMPLOYEE LIVED IN BENSENVILLE

A Park District employee lived in Bensenville in violation of the personnel rule that requires Park District employees to live within Chicago's city limits. Documentary evidence and multiple surveillances established that the employee lived outside of Chicago.

The investigation also revealed (among other things) that the employee's spouse held elected office in Bensenville before and during the investigation. Surveillances showed that the employee lived in Bensenville. The employee admitted to living at the Bensenville residence with his/her spouse and their children for (according to the employee) the prior six months while performing renovations on the property. The employee also claimed to live in a Chicago rental property that he/she owned with a roommate whose name the employee could not recall.

OIG recommended the employee's termination. The Park District followed the recommendation.

C. RESIDENCY VIOLATION: EMPLOYEE LIVED IN UNIVERSITY PARK

A Park District employee lived in University Park 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 investigation revealed that the employee had a driver’s license, car registration and utilities in his/her name at the University Park residence. The employee was seen on multiple surveillances leaving the suburban residence and boarding the Metra train from University Park. The employee gave shifting and conflicting testimony during an OIG interview.

OIG recommended the employee’s termination. The Park District followed the recommendation.

II. 2017 CASELOAD INFORMATION

Investigations by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	22	93	85	9	209
Closed	140	63	60	151*	414
Pending	151♦	181	206	64	64

♦ Includes carry-over from previous quarter.

* Includes 132 closely related investigations closed together.

Reviews by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	4	0	5	11	20
Closed	1	3	6	11	21
Pending	4♦	1	0	0	0

♦ Includes carry-over from previous quarter.

Nature of Investigations and Reviews Initiated by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Criminal Misconduct or Fraud	4	4	3	4	15
Waste and Inefficiency	2	3	5	10	20
Other Rule, Code, Ordinance Violations	18	86	82	6	192

Audits by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Opened	3	6	2	9	21
Closed	2	6	3	7	18
Pending	3♦	3	2	4	4

♦ Includes carry-over from previous quarter.

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2017 Total
Officers	0	0	0	1	1
Employees	3	7	3	8	21
Other (Agents, concessionaires contractors, other parties, unknown)	19	86	82	0	187

Cases Pending Over Six Months

[4]

Reason

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

Available Resources [2]

III. COMPLIANCE MONITORING ACTIVITY — FOURTH QUARTER 2017

Under the Chicago Park District Employment Plan, OIG reviews and monitors the Park District's hiring and assignment determinations to ensure that impermissible political factors have not played a role. OIG reports on its compliance monitoring activities in each its quarterly reports.

A. MONITORING CONTACTS BY HIRING DEPARTMENTS

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 2017.

1. *Review of Exempt List Modifications*

OIG reviews the Park District's adherence to exemption requirements and modifications to the list of job titles and number of positions that are Exempt from the Employment Plan procedures. The following modifications were made to the Employment Plan in the fourth quarter of 2017:

- The Finance Manager title was removed from the Exempt List. There were five positions on the Exempt List

The following job titles were added to the Exempt List:

- Deputy Director of Budget and Management
- Deputy Comptroller
- Deputy Treasurer

The following new job titles will be added to the Exempt List pending approval by the Personnel Board:

- Deputy Chief Operating Officer
- Director of Environmental Services

2. Review of Exempt Management Hires

The Park District reported no Exempt hires made during the fourth quarter of 2017.

3. Review of Written Rationales

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

Human Resources did not submit any “no consensus” letters during the fourth quarter of 2017.

4. Review of Emergency Appointments

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

Human Resources reported no emergency appointments in the fourth quarter of 2017.

5. Review of “Acting Up” Activity

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).

Human Resources reported no instances of employees “acting up” through the end of the fourth quarter of 2017.

Based on OIG’s review, one Physical Instructor has been in acting up status as a Park Supervisor since late 2016 – well past the 120 days allowed for acting up assignments.

B. COMPLIANCE HIRING MONITORING AND AUDITS OF PREVIOUS QTR. (3Q 2017)

OIG conducts audit sampling of the Park District’s hiring activity from the previous quarter.

1. Review of Notices of Job Opportunities

OIG audits modifications to minimum requirements and screening and hiring criteria and modifications of class specifications, minimum requirements, or screening and hiring criteria. OIG found no compliance issues with the posted minimum

requirements and other criteria in the corresponding Notices and Job Opportunities during 3Q '17.

2. Review of Qualified Applicants/Bidders Lists

OIG audits the lists of applicants/bidders who meet the predetermined minimum qualifications for the position (as generated by Human Resources).

OIG's review of the lists of applicants/bidders in the 3Q '17 sequences revealed one hiring round in which apparently qualified internal Park District candidates were not included in the Minimally Qualified List. The sequence is under review.

3. Review of Candidate Testing

OIG found no issues related to testing of Park District job candidates in 3Q '17.

C. NO ARBITRATIONS OR GRIEVANCES REPORTED

OIG audits all arbitration and grievances involving hiring, promotions, transfers or involving allegations of unlawful political discrimination. Human Resources did not report any arbitrations or grievances in the fourth quarter of 2017.

D. EMPLOYMENT AND EDUCATIONAL VERIFICATION DISCOVERED A QUESTIONABLE HIRE

As an extension of its compliance audits, OIG confirms the previous employment and educational backgrounds of selected new employees. During the fourth quarter of 2017, OIG discovered that an Artcraft Instructor had been hired and onboarded without having submitted proof of the educational history required for the position or proof of Chicago residency. OIG sought the required materials directly from the Artcraft Instructor, but the employee was terminated shortly after OIG's request was made – apparently for performance reasons.