

**CHICAGO PARK DISTRICT  
OFFICE OF INSPECTOR GENERAL  
PETER NEUMER, INSPECTOR GENERAL**



**2024 OIG ANNUAL REPORT**

## Message from the Inspector General:

To the Chicago Park District Board of Commissioners, Park District employees, and Park District patrons:

In the 2024 fiscal year (FY24), each of the OIG's divisions—Investigations, Audit, and Hiring Compliance—had notable accomplishments. More specifically:

- The OIG's Investigations division issued more than 60 reports containing substantiated findings of employee misconduct and reduced its active caseload from over 100 cases to 42.
- The OIG's Audit Department launched its inaugural community feedback survey to formally gather, for the first time ever, public comments and suggestions for its annual Audit Plan.
- The OIG's Hiring Compliance division (1) worked with the Park District's Human Resources Department (HR) to update the Park District's Employment Plan for the first time in 10 years and (2) created Employment Plan trainings for Park District interviewers and supervisors—over 500 Park District employees have now taken the interviewer training.

From a personnel standpoint, the OIG was also active as it hired a Deputy Inspector General, a Director of Audit and two Investigators during FY24. These hires have allowed the OIG to attain a greater level of stability in its operational procedures.

Looking forward to 2025, the OIG will seek to finalize directives and manuals for all divisions of the office with the goal of being ready for a first-ever peer review by the Association of Inspectors General in 2026. The Audit Department will also seek to complete an update of the Audit Charter and the Park District Code to better reflect current practices and best practices for performance audits. Finally, the Hiring Compliance division will, in addition to its investigative and monitoring efforts, work with HR on another update of the Employment Plan.

Thank you for your interest in the OIG and its important mission.

Sincerely,

Peter Neumer  
Inspector General  
Chicago Park District Office of Inspector General

# Table of Contents

**Office Overview, p. 1**

**Quarterly and FY24 Investigative Metrics and Summaries, p. 2**

**Quarterly and FY24 Audit and Review Metrics, p. 9**

**Quarterly and FY24 Hiring Compliance Activity, p. 13**

**Matters Pending Over Six Months, p. 18**

## Office Overview

### Mission

Pursuant to the Chicago Park District Code, the OIG is responsible for:

- Investigating allegations of fraud, waste, and misconduct by Chicago Park District employees, members of the Board of Commissioners, contractors, agents, and volunteers;
- Conducting District-wide internal audits to assess the integrity of financial reporting systems, the effectiveness of internal controls, and the efficiency of established procedures; and
- Monitoring the Park District's compliance with the Employment Plan's rules governing hiring and other employment actions.

### Budget

For the 2024 fiscal year (FY24), the OIG's budget was \$1,008,565. For the upcoming 2025 fiscal year, the OIG's budget is \$1,148,162.

### Personnel

At the end of the fourth quarter of FY24, the OIG was staffed as follows: an Inspector General, Deputy Inspector General, Director of Audit, two full-time Auditors, two full-time Investigators, one part-time Investigator, one part-time Hiring Compliance contractor, and an Administrative Assistant. The OIG also receives regular support from law enforcement personnel.

### Reporting Fraud, Waste, and Abuse

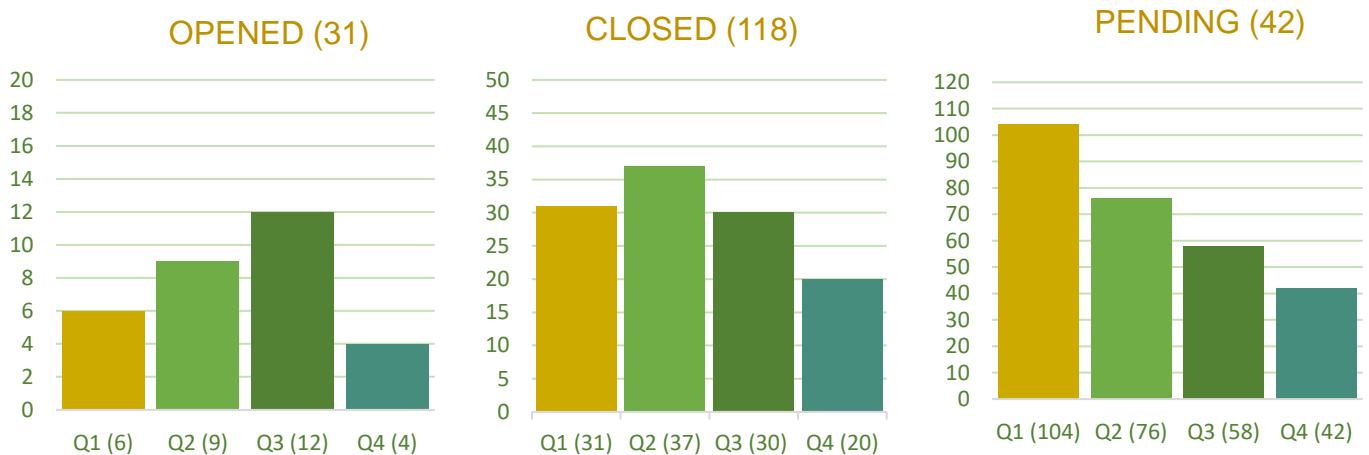
Reports of fraud, waste and abuse can be made to the OIG in multiple ways:

- Online: [Click here to submit online complaint](https://chicagoparkdistrict.i-sight.com/external/case/new) or visit: <https://chicagoparkdistrict.i-sight.com/external/case/new>
- By telephone: (312) 742-3333 (Confidential Hotline)
- In writing:  
Chicago Park District Office of Inspector General  
740 North Sedgwick Street Suite #300  
Chicago, IL 60654
- By fax: (312) 742-9505

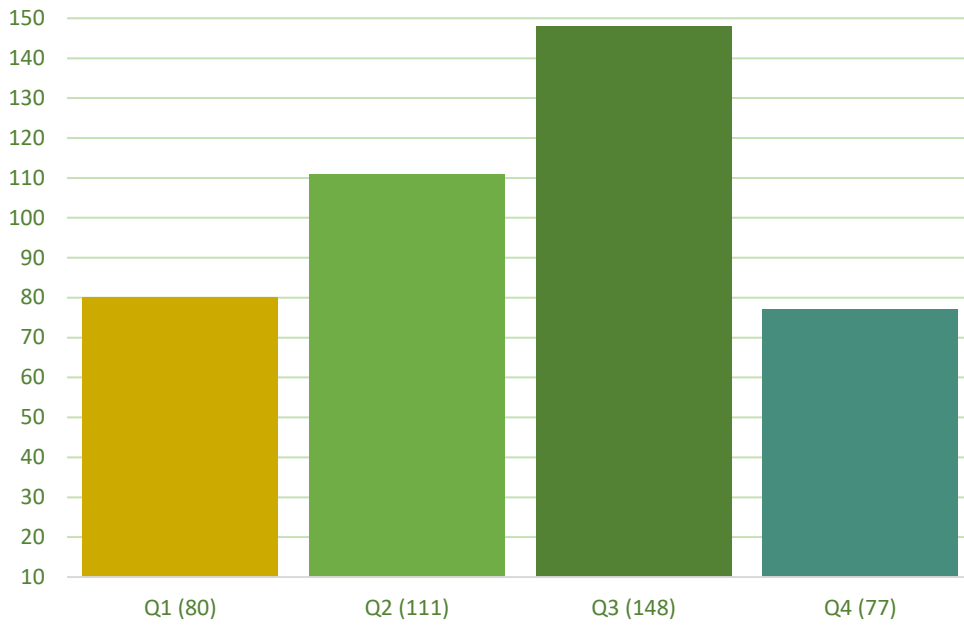
## FY24 INVESTIGATIVE METRICS

In the 2024 fiscal year (FY24), as the below charts reflect, the OIG received 416 complaints, opened 31 investigations, and closed 118 investigations. Of the 31 investigations the OIG opened in FY24, 10 involved potential criminal misconduct or fraud, 14 involved other rule, code or ordinance violations, and 7 involved waste, inefficiency or compliance. With respect to the focus of OIG’s investigations, 25 concerned the conduct of an employee or employees, 1 concerned the conduct of an officer or officers, and 5 concerned “other” parties (i.e., patrons, agents, concessionaires, contractors, partners or unknown parties). The OIG has 42 pending investigations, down from 129 at the end of FY23.

### INVESTIGATIONS



## COMPLAINTS RECEIVED\* (416)

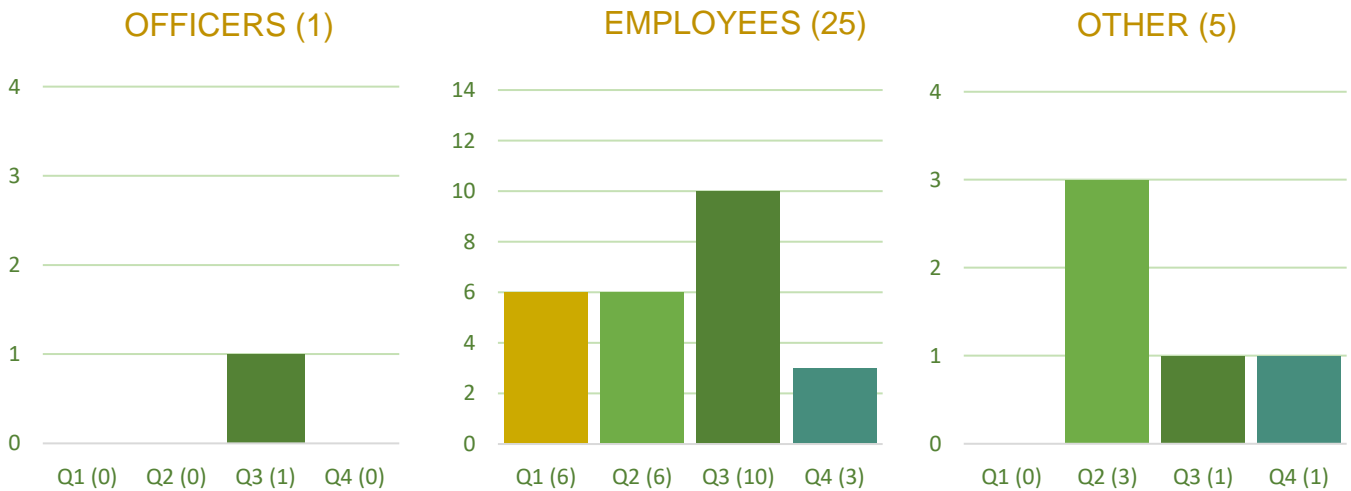


\* "Complaints received" reflect the number of contacts received during the quarter and includes OIG-initiated complaints. Matters not within the scope of the OIG's mission are referred to other Park District departments or to external agencies.

## TYPES OF INVESTIGATIONS



## INVESTIGATED AND REVIEWED PARTIES<sup>1</sup>



<sup>1</sup> The term "other" in the below chart includes patrons, agents, concessionaires, contractors, partners and unknown parties.

## FY24 Fourth Quarter Investigative Information

As the above charts reflect, OIG opened 4 investigations in the fourth quarter of 2024 and closed 20 investigations.

Of the 4 investigations the OIG opened in the fourth quarter, 3 of them involved potential criminal misconduct or fraud, 1 involved other rule, code or ordinance violations, and zero of them involved waste, inefficiency or compliance. With respect to those 4 investigations, 3 concerned the conduct of employees, zero concerned the conduct of officers, and 1 concerned “other” parties (i.e., patrons, agents, concessionaires, contractors, partners or unknown parties).

The OIG had 42 pending investigations at the end of the fourth quarter of FY24. The OIG received 77 complaints in the fourth quarter.

## FY24 Fourth Quarter Investigative Summaries<sup>2</sup>

### PPP Investigations

In the fourth quarter of 2024, the OIG completed 11 investigations that resulted in sustained findings of PPP fraud. More specifically:

- In 23-0202, the OIG would have recommended discharge for a seasonal Activities Instructor for fraudulently obtaining a PPP loan, but the employee’s Park District employment ended prior to the conclusion of the OIG’s investigation. Accordingly, the OIG recommended that Management include a copy of the OIG’s report in the employee’s personnel file, so that if they applied for re-employment with the Park District, the report could be considered before any decisions were made with respect to their application. In response, HR stated that the employee had been marked as do not rehire and that HR would refer to the OIG’s report if the employee applied for Park District re-employment.
- In 23-0409, the OIG recommended that a Rigger be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan and then lying to the OIG about their purported business. Management’s response to the OIG’s report is due on January 17, 2025.
- In 23-0520, the OIG recommended that a Laborer be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan. Management’s response to the OIG’s report is due on January 27, 2025.
- In 23-0528, the OIG recommended that a Labor Foreman be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan. Following the issuance of the OIG’s report, the employee resigned and was placed on the ineligible for rehire list.

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<sup>2</sup> Summaries of OIG’s FY24 Q1, Q2 and Q3 investigative reports are available here: [Office of the Inspector General | Chicago Park District](#).

- In 23-0545, OIG recommended that a Security Guard be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan. Following the issuance of the OIG’s report, the employee was discharged and placed on the ineligible for rehire list.
- In 23-0550, OIG recommended that an Attendant be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan. Following the issuance of the OIG’s report, the employee resigned and was placed on the ineligible for rehire list.
- In 23-0551, the OIG recommended that an Attendant be discharged and placed on the ineligible for rehire list for fraudulently obtaining two PPP loans. Following the issuance of the OIG’s report, the employee was discharged and placed on the ineligible for rehire list.
- In 23-0553, the OIG would have recommended discharge for a Recreation Leader for fraudulently obtaining a PPP loan, but the employee resigned prior to the conclusion of the OIG’s investigation. Accordingly, the OIG recommended that Management (1) designate the employee as Resigned under Inquiry; and (2) include a copy of the OIG’s report in the employee’s personnel file, so that if the employee applied for re-employment with the Park District, the report could be considered before any decisions were made with respect to employee’s application. In response, HR stated that the employee had been marked as having Resigned Under Inquiry and further stated that if the employee reapplied for Park District employment, the OIG’s report would be considered.
- In 23-0557, the OIG recommended that an Attendant be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan and then lying to the OIG about their receipt of those loan proceeds. Following the issuance of the OIG’s report, the employee resigned and was placed on the ineligible for rehire list.
- In 23-0558, the OIG would have recommended discharge for a Physical Instructor for fraudulently obtaining a PPP loan and then lying to the OIG about their receipt of those loan proceeds, but the employee resigned prior to the conclusion of the OIG’s investigation. Accordingly, the OIG recommended that Management (1) designate the employee as Resigned under Inquiry; and (2) include a copy of the OIG’s report in the employee’s personnel file, so that if the employee applied for re-employment with the Park District, the report could be considered before any decisions were made with respect to employee’s application. In response, HR stated that the employee had been marked as “Resigned Pending Investigation” and further stated that if the employee reapplied for Park District employment, HR would refer to the OIG’s report.

In addition, in 23-0518, an Activities Instructor alleged to have engaged in PPP loan fraud repeatedly failed to provide the OIG with requested tax records and then resigned their Park District employment prior to the conclusion of the OIG’s investigation. Accordingly, although the OIG, due in part to the Activities Instructor’s failure to fully cooperate with the OIG’s investigation, was unable to definitively determine whether the Activities Instructor was eligible to receive a PPP loan, the OIG recommended that Management: (1) designate the Activities Instructor as Resigned under Inquiry; and (2) include a copy of the OIG’s report in the Activities Instructor’s personnel file, so that if the Activities Instructor applied for re-employment with

the Park District, the report could be considered before any decisions were made with respect to their application. In response, HR stated that the employee had already been placed on the ineligible for rehire list for reasons unrelated to the OIG's report, and further stated that in the event the employee reapplied for Park District employment, HR would refer to the OIG's report.

In 23-0549, the OIG investigated an allegation that an Attendant engaged in PPP loan fraud. The OIG ultimately determined that the Attendant was eligible to receive a PPP loan based on their work as an independent contractor. The OIG therefore found that the allegation against the Attendant of PPP loan fraud was unsubstantiated. However, the evidence did establish that the employee violated the Park District's secondary employment policy by failing to make the required notifications and obtain the necessary approvals regarding their secondary employment. Accordingly, the OIG recommended that the Park District (1) take appropriate disciplinary action with respect to the employee's violation of the Park District's secondary employment rules; and (2) ensure that the employee takes the necessary steps to fully comply with those rules. In response, HR stated that they issued the employee a verbal reprimand and that the employee subsequently submitted a dual employment form.

## Other Investigations

The OIG also made a sustained finding in the following non-PPP related investigation that it closed in the fourth quarter:

### **24-0109 – Theft and Threats of Retaliatory Violence**

In 24-0109, the OIG established that a Park District Attendant violated the Park District's Code of Conduct by taking, without authorization, a mop bucket, purchased by the Park District for \$160.67, for use at the Attendant's private business. The evidence further reflects that during the course of the OIG's investigation the Attendant violated the Park District's Human Rights Ordinance by making retaliatory threats of violence while at the workplace.<sup>3</sup> Finally, the OIG's investigation established that the Attendant failed to complete a secondary employment form prior to working at and then owning a private business in violation of the Park District's secondary employment policy. The OIG therefore recommended that the Park District discharge the Attendant and place them on the Park District's ineligible for rehire list.

Following the issuance of the OIG's report, the employee was discharged and placed on the ineligible for rehire list.

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<sup>3</sup> The OIG reported the initial threat to the Park District's Office of Prevention and Accountability (OPA) and, after discussion with OPA, OPA and the OIG agreed that, although such a threat was within OPA's jurisdiction, given the circumstances, it was appropriate for the OIG to investigate the threat as part of its overall investigation of the Attendant's conduct.

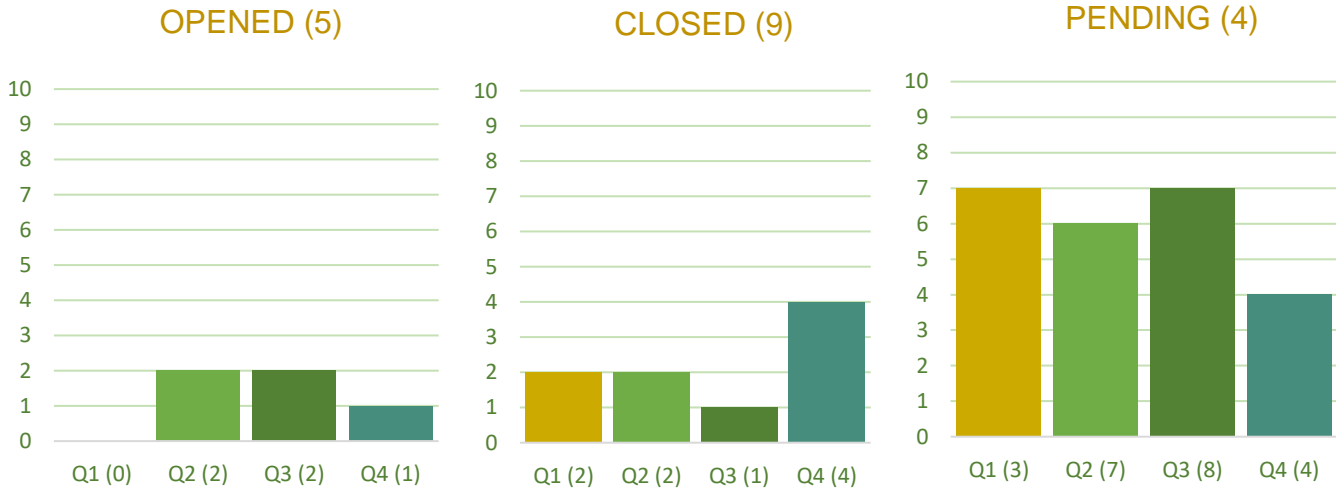
## Park District Responses to Previously Issued Investigative Reports

In the fourth quarter of FY24, the Park District responded to four investigative reports that the OIG issued in the third quarter of FY24: 23-0193, 23-0359, 23-0467, 23-0525.

- In 23-0193, the OIG recommended that a seasonal Camp Counselor be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan and then lying to the OIG about their application for and receipt of those loan proceeds. In response, HR stated that the employee's seasonal employment had ended in August of 2023, that the employee had been marked as do not rehire, and that HR would refer to the OIG's report if the employee applied for re-employment with the Park District.
- In 23-0359, the OIG recommended that an Attendant be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan and then lying to the OIG about their application for and receipt of those loan proceeds. Following the issuance of the OIG's report, the employee was discharged and placed on the ineligible for rehire list.
- In 23-0467, the OIG recommended that a Physical Instructor be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan and then lying to the OIG about their purported business. Following the issuance of the OIG's report, the employee was discharged and placed on the ineligible for rehire list.
- In 23-0525, the OIG recommended that a Natatorium Instructor be discharged and placed on the ineligible for rehire list for fraudulently obtaining two PPP loans. Following the issuance of the OIG's report, the employee was discharged and placed on the ineligible for rehire list.

## Audit and Review Summaries

In FY24, the OIG’s Department of Audit opened 5 audits, closed 9 audits, and concluded the year with 4 pending, i.e., in-progress, audits (see below charts).<sup>4</sup>



In the fourth quarter of FY24, the OIG opened 1 audit (24-0431) and closed 4 audits 23-0216, 23-0218, 23-0276, and 23-0584.

### 23-0584 - The Park District’s Vendor Contract Extension Procedures

In 23-0584, which concerned the Park District’s contract extension approval process, the OIG determined that the Purchasing Department did not have a written policy regarding contract extensions, did not document extensions in a consistent manner, and did not require a justification for the extension of a contract. Accordingly, the OIG made two recommendations for the Purchasing Department: (1) implement a written policy detailing the approval process for vendor contract extensions; and (2) take action sufficient to ensure the more consistent use of the “Extension Option Review Form”—which a user department completes by inputting information about the proposed extension, including vendor performance, fund availability, and details specific to contract purchase orders and bidding—and modify the Form to include a field for the user department to provide a justification explaining the necessity of an extension.

<sup>4</sup> Summaries of the audits closed in the first three quarters of FY24 can be found in OIG’s FY24 quarterly reports: <https://www.chicagoparkdistrict.com/about-us/departments/office-inspector-general>. The OIG did not open or close any reviews in FY24 and does not have any pending reviews.

## *Summary of Audit Report 23-0584*

Chapter 11 of the Park District Code states as follows with respect to the approval of contract extensions:

The [Park District] Board shall have the duty, responsibility and power to enter into contracts for goods, services, and construction for use by the Park District, where the contract value or change order exceeds \$200,000. With regard to contracts approved by the Board under this section, the Board shall separately approve the exercise of an extension option provided for in the original contract.

Although Chapter 11, Section C of the Park District Code specifies: (1) that the Director of Purchasing “shall have the duty, responsibility and power to enter into contracts and approve all change orders and contract modifications, for goods, services, and construction for use by the Park District, where the contract value or change order does not exceed \$20,000” and (2) that the General Superintendent, upon the recommendation of the Director of Purchasing, “shall have the duty, responsibility and power to enter into contracts and approve all change orders and contract modifications for goods, services, and construction for use by the Park District, where the contract value or change order does not exceed \$200,000,” neither provision explicitly addresses the approval process for contract extensions.

While the Park District Code does not specifically address the extension of vendor contracts valued at \$200,000 or less, interviews conducted by the OIG indicate that the Purchasing Department is responsible for facilitating the approval process for these extensions upon a contract’s expiration. However, the Purchasing Department informed the OIG that it lacked written policies on contract extensions and that its “Policy and Procedure Manual” did not address this process.

The Purchasing Department stated that, in practice, it operates collaboratively with user departments and vendors to identify contracts approaching their end date. The Department uses its contract management software, Bonfire, to assist in this process. Bonfire alerts the Advanced Buyer, a Purchasing Department employee responsible for contract management and coordination with user departments, when a contract is nearing expiration. The Advanced Buyer then notifies the relevant user department, which must decide whether to extend the contract.

According to the Purchasing Department, the final decision on whether to extend a contract typically rests with the user department, which is expected to be the subject matter expert. However, the Purchasing Department may recommend against an extension when appropriate.

The Purchasing Department provided the OIG with a copy of the “Extension Option Review Form,” which, according to the Department, is occasionally distributed to user departments that wish to extend their contracts. This form solicits information on vendor performance, fund availability, and details specific to contract purchase orders and bidding. It also includes a check

box option for either exercising or declining the extension and requires the head of the department's signature for approval.

However, according to the Purchasing Department, if a user department did not use the "Extension Option Review Form," extensions could also be approved based on an email request from the department. These email requests do not need to contain a justification for the extension.

Based on its assessment of the Park District's contract extension process, the OIG identified two areas for possible improvement:

1. Implement a written policy for contract extensions which could establish greater consistency in the contract extension process and ensure that all contract extensions have a documented justification prior to their approval.
2. Facilitate the more consistent use of the "Extension Option Review Form."

The Department of Purchasing provided the following responses to the OIG's recommendations:

"Resolution to Recommendation [1]: The 'Purchasing Policy' manual will be updated by Purchasing with a written policy, for contract extensions, and with a template for the new Extension document by December 12, 2024. The Code, chapter 11, reflects the new extension policy, as of March 31, 2023."

"Resolution to Recommendation [2]: The 'Extension Option Review' forms, both the 180 Day Extension form and the usual 'Extension Option Review' form, have been edited to include a section for the User Department to add a narrative as to why this one-year extension is warranted (examples attached). This Extension Option Review form will be developed to be signed by the "User Department" head. The 'User Department' will explicitly state why at this time the contract must be extended. The Purchasing Code allows for one (1), one-hundred-eighty (180) day extension. This time extension of 180 days allows for both Purchasing and the User Department to conduct a formal RFP for the next contract period. If the current contract has allowable extensions, the 'Extension Review Form' and noted as first extension, second extension, etc. Additionally, the 'Extension Option Review Form' is used consistently. It is an internal document that is stored on the shared drive and not on Bonfire."

Following the OIG's issuance of its draft report to the Department of Purchasing, the Department provided the OIG with two examples of the form completed by user departments which now include a new field instructing the user department to "[p]lease provide below an attached narrative (2-3 paragraphs) as to why this extension is warranted."

In addition to 23-0584, the OIG closed three audits without issuing a final report:

- In 23-0216, which sought to assess the District's compliance with rules regarding District purchases under \$20,000, the OIG closed the audit because the audit was in its early stages and the fieldwork already conducted was not fully in accordance with the audit's objectives. Accordingly, the OIG determined it would be more efficient to utilize its limited resources on other pending projects.
- In 23-0218, which concerned whether certain Park District permittees appropriately received a fee discount, the OIG closed the audit after the OIG's Director of Audit determined the audit, as structured, effectively called on the Department of Audit to perform an investigative function: identifying potential misfeasance on the part of District permittees.
- In 23-0276, which concerned the District's prequalified vendor pools, the OIG determined that the fieldwork already conducted was not directly aligned with the audit's objectives. Accordingly, as changes had been made to the prequalified vendor pools since the opening of the audit, the OIG determined that the most efficient use of the OIG's resources would be to close 23-0276 and open a new audit (24-0431), in which the OIG will evaluate the District's processes for establishing a vendor pool, approving vendors for inclusion in a pool, and selecting a vendor from a pool.

## Hiring Compliance Activity

Pursuant to the Park District Employment Plan, the OIG is responsible for reviewing and monitoring the Park District's hiring and assignment actions to ensure that they comply with the Plan. The OIG reports on its compliance-monitoring activities in each of its quarterly reports.

In addition to the investigative and audit activities described below, the OIG notes that pursuant to Section V(C)(2) of the Employment Plan, which states that "HR and the [OIG] will conduct comprehensive mandatory training of all Supervisors and any other individuals with the authority to make decisions affecting an Employment Action to assure they are aware of and knowledgeable about the Employment Plan," the OIG drafted and finalized an Employment Plan training for Park District supervisors in the fourth quarter of FY24. The OIG, in coordination with HR, plans to roll that training out to appropriate Park District staff in 2025.

In addition, as an update to previous FY24 quarterly reports, 583 Park District employees have completed the Employment Plan training for interviewers that the OIG finalized in FY24.

### FY24 Fourth Quarter Hiring Compliance Report Summaries<sup>5</sup>

In the fourth quarter of FY24, the OIG issued two hiring compliance reports (23-0503 and 23-0562):

- In 23-0503, the OIG conducted an investigation regarding an allegation that the Park District repeatedly and improperly failed to select an applicant for Park District employment. The OIG reviewed the relevant hiring sequences but did not identify any material violations of the Employment Plan or the applicable collective bargaining agreement with respect to the Park District's selection of candidates. Accordingly, the OIG found that the allegation was not sustained. Because the OIG's report did not contain a finding of a violation of the Employment Plan or a recommendation of corrective action, pursuant to Section V(G)(5)(b) of the Employment Plan, the General Superintendent did not need to prepare a General Superintendent's Report in response to the report.
- In 23-0562, the OIG conducted an investigation regarding an allegation that the Park District unfairly promoted two Park District employees. The OIG reviewed the relevant hiring sequences but did not identify any material violations of the Employment Plan with respect to the Park District's selection of candidates. Accordingly, the OIG found that the allegation was not sustained. Because the OIG's report did not contain a finding of a violation of the Employment Plan or a recommendation of corrective action,

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<sup>5</sup> Summaries of OIG's FY24 Q1, Q2 and Q3 hiring compliance reports are available here: [Office of the Inspector General | Chicago Park District](#).

pursuant to Section V(G)(5)(b) of the Employment Plan, the General Superintendent did not need to prepare a General Superintendent's Report in response to the report.

## Park District Responses to Previously Issued Hiring Compliance Reports

In the fourth quarter of FY24, the Park District responded to one hiring compliance report that the OIG issued in the third quarter of FY24: 23-0249.

- In 23-0249, the OIG investigated a seasonal Park District employee's allegation that they were unfairly denied a year-round position by the Park District. Although the OIG's investigation established that the Park District did not fully comply with the procedural and recordkeeping requirements of the Park District Employment Plan in filling several vacancies for which the former employee was a candidate, based on the evidence the OIG was able to review, the OIG did not find any indication that these violations of the Employment Plan materially affected the fairness of any hiring decision pertaining to the complainant. However, the OIG noted that because certain hiring records were missing, OIG was not able to conduct a complete review of each of the hiring sequences for which the complainant was a candidate. Based on the evidence the OIG was able to obtain, though, the OIG concluded that the complainant's allegation was not sustained.

With respect to HR's failure to retain certain vacancy-related hiring records, which failure constituted a violation of the Employment Plan and likely the Local Records Act as well, the OIG recommended that HR (1) consult with the Park District's Law Department to ensure that HR has an appropriate record retention policy in place; and (2) take action sufficient to ensure that HR staff is fully and completely complying with all applicable record retention rules and procedures.

With respect to the procedural violations of the Employment Plan, which included the failure to use the same interviewers for all of the interviews for one of the positions, as required by Section VI(K)(3) of the Plan, the OIG noted that since the conclusion of the hiring sequences detailed in the report, in conjunction with HR, the OIG created and conducted an Employment Plan training for HR staff and developed an Employment Plan training for Park District interviewers, which is now available for potential interviewers. As the OIG expected that these trainings will help prevent the recurrence of such Employment Plan violations going forward, the OIG did not have further recommendations in this area.

In summary, the Park District responded as follows:

"One aspect of Case No. 23-0249 concerned interview processes and failure to adhere to Section VI(K)(3) of the Plan which requires the same interviewers for all of the interviews for one of the positions, as required by of the Plan. The OIG report in this case contains the following:

... the OIG notes that since the conclusion of the hiring sequences detailed in the report below, it has, in conjunction with HR, created and conducted an Employment Plan training for HR staff and developed an Employment Plan training for Park District interviewers, which is now available for potential interviewers. It is the OIG's expectation that these trainings will help prevent the recurrence of such Employment Plan violations going forward and the OIG therefore does not have further recommendations in this area at this time.

This being the case, the Superintendent appreciates the work done by both HR and OIG to address future compliance with this Plan requirement and has no further comment on Case No. 23-0249."

Management, in an additional response, further stated:

"In the course of conducting the investigation in Case No. 23-0249 the OIG noted in its September 9, 2024 report that records were missing for two of the relevant hiring sequences being reviewed and that the Human Resources Department's failure to retain rating forms violated Section V(I) of the Plan. Further, the OIG noted, this failure likely violated the State of Illinois Local Records Act as well, since the records were less than two years old at the time of the OIG's request. As a result, the following recommendation was made by the OIG:

Accordingly, the OIG recommends that HR (1) consult with the Park District's Law Department to ensure that HR has an appropriate record retention policy in place; and (2) take action sufficient to ensure that HR staff is fully and completely complying with all applicable record retention rules and procedures. Such steps should help prevent the recurrence of record retention related Employment Plan violations.

On October 9, 2024 the Human Resources department made the following response to the OIG recommendation, and provided information relative to the move of materials in connection with the relocation of District headquarters that took place in June of 2023:

Human Resources has conferred with Law, Sarah Gelder and personnel from the Illinois Secretary of State regarding the Park District's standing Local Retention policy and best practices. At the time of the move, HR was aware of the requirements regarding rating sheets (see summary sheet created in 2023); any purge of the subject documents was inadvertent and does not reflect the current practices of the department. Human Resources will continue to work with Law and the Illinois Secretary of State for any necessary changes to the Act and/or compliance.

The Superintendent appreciates the work done in 2023 by HR, the Law Department and the Board Secretary's office to comply with the Local Records Act and the Plan as preparations were made to purge, retain and store records as appropriate for the move of administration

headquarters. The OIG’s investigation in this case draws attention to the continued importance of handling records as required by State law as well as the Plan, and HR’s response reflects its commitment to do so.”

The Park District’s full responses to the OIG’s 23-0249 report can be found here:

[Gen Supt response to OIG Case 23-249.pdf](#)

[Additional Supt response case 23-249.pdf](#)

## FY24 Fourth Quarter Hiring Sequence Audit Reports

In the fourth quarter of FY24, the OIG issued two hiring sequence audit reports (24-0379 and 24-0380):

- In 24-0379, the OIG conducted an audit of the hiring sequence for a Physical Instructor position. The OIG determined that the District materially complied with the requirements of the Employment Plan with respect to this hiring sequence.
- In 24-0380, the OIG conducted an audit of the hiring sequence for a Playground Supervisor position. The OIG determined that the District materially complied with the requirements of the Employment Plan with respect to this hiring sequence.

## Review of Exempt List Modifications

The OIG is responsible for reviewing the Park District’s adherence to the rules set forth in the Employment Plan pertaining to the job titles that are exempt from the Employment Plan procedures.

There were no additions to the Exempt List in the fourth quarter of 2024.

A copy of the most recently updated Exempt List can be found at:

[CPD Shakman-Exempt List 23.10.12 -2-.pdf \(chicagoparkdistrict.com\)](#)

## 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. HR reported no emergency appointments during the fourth quarter of 2024.

## Review of Exempt Management Hires

Human Resources reported three exempt hires during the fourth quarter of 2024:

- Chief Financial Officer, Financial Services
- Director of Budget and Management, Office of Budget and Management
- First Deputy General Counsel, Law

## Monitoring Contacts by Hiring Departments

Pursuant to the Employment Plan, the OIG is to review all reported or discovered instances where hiring departments contacted HR 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. HR reported one allegedly improper contact by a hiring department in the fourth quarter of 2024, which the OIG is currently investigating.

## Review of “Acting Up” Activity

The OIG is responsible for reviewing the circumstances when an employee “acts up” (performing all or substantially all of the duties of an employee in a higher-paid classification). Activity in the fourth quarter of 2024 reflected 12 instances of employees “acting up” and 33 instances where an employee who had been in “acting up” status was placed back in their position.

## Review of Written Rationales

The OIG is responsible for reviewing 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 2024.

## Arbitrations and Grievances

Pursuant to the Employment Plan, the OIG is to audit arbitrations and grievances involving hiring, promotions, transfers, or allegations of unlawful political discrimination. The OIG received notification from Human Resources that 4 grievances were filed during the fourth quarter of 2024. The OIG reviewed those grievances and determined that none of those grievances involved Employment Plan-related issues. Human Resources did not report any arbitrations during this quarter.

## Hiring Compliance Advisories

Under the Park District’s Employment Plan, the OIG, in its role as the Compliance Monitor, is to participate in “the development, recommendation and implementation of necessary policy and operating changes.” See Section XI(A) of the Employment Plan. In the fourth quarter, the OIG was consulted on two matters and rendered advisory opinions on issues that arose pertaining to implementation or interpretation of the Employment Plan.

## OIG Matters Pending Over Six Months

Chapter 2(D)(9) of the Chicago Park District Code provides that the OIG’s quarterly reports “shall identify any investigation, audit or review which has not been completed within six months, and shall state the reasons for failure to complete the investigation, audit or review within six months.” The OIG’s pending matters, as well as the reasons for their continuing pending status, are set forth in the below chart.

The OIG reduced the number of matters on this list in the fourth quarter of FY24 from 41 to 29.

Case Number	Matter Type	Nature of Allegation	Reason
23-0174	Investigation	Criminal Conduct	Complex investigation – involves multiple allegations of theft.
23-0251	Investigation	Residency	Resource intensive investigation.
23-0252	Investigation	Residency	Resource intensive investigation.
23-0253	Investigation	Residency	Resource intensive investigation.
23-0275	Investigation	Residency	Resource intensive investigation.
23-0355	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0360	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0416	Investigation	Time Falsification	Resource intensive investigation.
23-0468	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0522	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0534	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0546	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.

23-0547	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0552	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0559	Investigation	Hiring compliance	Complex investigation – multiple allegations.
24-0001	Investigation	Time Falsification	Complex investigation – requires the analysis of significant records and documents and multiple interviews.
24-0006	Investigation	Unauthorized Use of Park District Resources	Complex investigation – requires the analysis of significant records and documents and multiple interviews.
24-0064	Investigation	Time Falsification	Resource intensive investigation.
24-0066	Investigation	Unauthorized Use of Park District Resources	Complex investigation – requires the analysis of significant records and documents and multiple interviews.
24-0071	Investigation	Preferential Treatment	High caseload.
24-0079	Investigation	Criminal Conduct	Complex investigation – requires the analysis of significant records and documents and multiple interviews.
24-0086	Investigation	Time Falsification	Resource intensive investigation.
24-0132	Investigation	Inappropriate use of Park District resources	Complex investigation – requires the analysis of significant records and documents
24-0140	Investigation	Hiring Compliance	Complex investigation – multiple allegations of Employment Plan violations.
24-0148	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.

24-0170	Investigation	Contract Performance	Complex investigation – requires the analysis of significant records and documents.
24-0172	Investigation	Criminal Conduct	High caseload.
24-0178	Investigation	Inappropriate use of Park District resources	High caseload.
24-0202	Investigation	Criminal Conduct	High caseload.

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All calls and emails are confidential.

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