

**CHICAGO PARK DISTRICT  
OFFICE OF INSPECTOR GENERAL**

**ALISON R. PERONA, INTERIM INSPECTOR GENERAL**



**OIG THIRD QUARTER  
2022 REPORT**

# Table of Contents

**Office Overview, p. 1**

**Investigations, p. 3**

**Audits and Reviews, p. 7**

**Hiring Compliance Monitoring Activity, p. 8**

**Quarterly Information, p. 12**

# Office Overview

## Mission

Pursuant to Chapter 2, Section D of the Chicago Park District Code, the OIG is charged with:

- Investigating allegations of fraud, waste, and abuse or misconduct by Chicago Park District employees, members of the Board of Commissioners, contractors, agents, and volunteers; and
- Monitoring the Park District's compliance with the Employment Plan's rules governing hiring and other employment actions.

Also in accordance with the Park District Code, the OIG conducts District-wide internal audits to assess integrity of financial reporting systems, the effectiveness of internal controls, and the efficiency of established procedures. While working to fulfill its legal mandate, the OIG partners with law-enforcement agencies, when appropriate, to ensure that serious criminal misconduct that is uncovered during the OIG's administrative investigations is investigated and prosecuted.

## Budget

In FY 2022, the OIG's adopted budget is \$899,421.

## Personnel

In the Third Quarter, the OIG was staffed as follows: an Interim Inspector General, Director of Audit, Assistant Compliance Officer, two full-time auditors, one part-time investigator, and two part-time contractual investigators. The OIG also receives regular support from law enforcement personnel.

## Training and Investigation Standards

Each employee of the OIG is a member of the Association of Inspectors General, a national organization of state, local, and federal Inspectors General and their staffs. Participation in the AIG offers employees continuing training in best practices related to the performance of the Inspector General Mission. The AIG collaborates with Inspector General offices from other state and local agencies to train all staff in a variety of areas related to investigations and audits. The OIG conducts its investigations in accordance with the AIG's Principles and Standards for Offices of Inspector General.

The OIG also abides by generally accepted principles, quality standards, and best practices applicable to federal, state, and local offices of Inspectors General. In addition, the OIG, at all times, exercises due professional care and independent, impartial judgment when conducting its investigations and issuing its reports and recommendations.

## Report Abuse, Fraud, and Waste

Submit a report to the OIG through one of the following options:

- 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 Avenue  
Suite #300  
Chicago, IL 60654

# Investigations

## HOSTILE WORK ENVIRONMENT/FAILURE TO INVESTIGATE

The OIG investigated a complaint that an employee reported sexual harassment to the Park District and that the allegation had not been investigated.

In July 2021, a supervisor notified Human Resources (HR) that an employee had reported a claim of sexual harassment. The employee indicated that a co-worker was making sexual comments and innuendos to her and co-workers. The OIG determined that the complaint had been sent to the Park District manager responsible for investigating harassment claims, but that the complaint had not been investigated. The manager left the employ of the Park District in late 2021.

The complainant was interviewed by OIG investigators and provided details about conversations where the co-worker made comments and references to sexual activity. She stated that she felt uncomfortable around him because of the nature of his conversations. Several employees provided accounts to the OIG which corroborated the allegations and provided information about other occurrences.

The subject employee was interviewed and denied the allegations.

The OIG recommended that Management take appropriate disciplinary action against the subject employee. The OIG also recommended that this report be placed in the former manager's personnel file. The former manager has already been designated as "Do Not Rehire."

Management has instituted disciplinary proceedings against the subject employee, and a hearing pursuant to the terms of the Collective Bargaining Agreement is pending. Regarding the former manager, the Park District has agreed to incorporate the OIG's findings into the former manager's personnel file.

## COMMUNICATIONS AND CONCESSION PERMITTING

The OIG determined that the Park District had issued a permit to the owner of mobile concession to operate “at various locations.” The permit did not list or name any specific parks. The business began operating at a park without prior notice to (or input from) the Park Supervisor or the advisory council, as required by Park District Code.

Upon receiving the complaints, the Park District immediately informed the concessionaire to cease operating at the park.

The OIG found that staff responded immediately and appropriately to the complaints about this concession by removing the business from the park. Park District managers acknowledged that protocols were not followed in issuing this permit (vagueness) and in failing to communicate with the stakeholders prior to the arrival of the vendor. Management had already implemented new controls pertaining to permit specificity.

The OIG recommended that Management update the Park District’s policy for coordinating possible concession opportunities with stakeholders, and to continue to engage with stakeholders regarding their concerns.

Management agreed to the OIG’s recommendations and has finalized an updated policy for coordinating possible concession opportunities with stakeholders. Management also committed to engage with the various individuals and groups in advance regarding any new proposed concessions.

## DOCUMENTATION OF TRANSFER REQUEST DENIALS

An employee reported to the OIG that he made several transfer requests between 2018-2021 but never received a transfer. The OIG confirmed that the employee made seven transfer requests during this period.

Under the Collective Bargaining Agreement (CBA), transfer requests are effective for one calendar year. The OIG confirmed that three of the employee's transfer requests were for positions that did not have vacancies within a year of his requests. In another instance, the employee was offered an interview for a position but declined. The Park District denied his request for a transfer for the fifth position, based on operational needs. HR could not locate Park District records for the other two transfer requests. The OIG determined that, in situations where interviews were conducted pursuant to the CBA, the Park District did not document reasons why transfer requests were denied.

Due to the lack of evidence that the employee was unfairly denied a transfer, the complaint was deemed not sustained.

The OIG recommended that HR begin keeping records pertaining to denials for transfer requests covered by the CBA.

The Park District has agreed to this recommendation.

## FAILURE TO MAINTAIN POSITION REQUIREMENT

The OIG received a complaint that an employee was suspected of violating Park District policy. During the course of the investigation, the OIG determined that the employee's driver's license had been revoked. The employee's position required a valid driver's license.

The OIG reported the violation. The employee resigned.

## ALLEGATION OF HOSTILE WORK ENVIRONMENT

The OIG received a complaint that a supervisor had created a hostile work environment. The complainant provided the OIG with examples of the supervisor's conversations and conduct that the complainant perceived as discriminatory and culturally inappropriate. The complainant indicated that the supervisor's tone was often sarcastic and dismissive.

While other employees related that the supervisor's behavior could be rude and abrasive, the OIG did not locate any witnesses to corroborate the complainant's statement that the supervisor made statements or engaged in behaviors that were discriminatory.

The OIG interviewed the supervisor. The supervisor denied making culturally inappropriate statements or engaging in discriminatory behavior.

While the complainant perceived that she was the victim of discrimination, the OIG found no evidence to corroborate the complainant's claim that the supervisor discriminated against her.

However, based on the reports of staff, there is evidence that the supervisor's communication style has created a negative work environment in her department. The OIG recommended that Management take whatever action deemed appropriate.

Management agreed with the OIG's recommendation. The supervisor has received counseling and is scheduled for retraining. The OIG's findings have been incorporated into the supervisor's personnel file.

# Audits

## ALLEGATION OF PARK ADVISORY COUNCIL FINANCIAL IMPROPRIETY

A Park Advisory Council (PAC) member alleged that the prior board had improperly paid a former PAC board member for services. Park Advisory Council Guidelines state that “any funds raised by the PAC may not be used to pay the salary of any PAC member, CPD staff or other organization for their efforts.”

The PAC was suspended in early 2022. One of the bases of the suspension was that the PAC had violated the PAC Code and the PAC Guidelines by removing membership and financial information from the park.

The OIG, with the assistance of the Park District, recreated a partial set of PAC membership and financial records. Based on recovered records, there was documentation that, between 2015-2018, the subject of the investigation had been paid approximately \$1,900.00 by the PAC “for bookkeeping services.” The last check to the subject for \$192.00 was cashed in March 2018.

The OIG was able to create a list of Board members dating back to 2008. The records indicate that the subject of the investigation was first elected to the PAC Board on February 28, 2018. The OIG was unable to determine if the subject was a PAC member prior to February 28, 2018.

The OIG confirmed that the PAC had written one check for \$192.00 to the PAC Board member in 2018. However, because PAC membership records are missing or incomplete, the OIG was unable to determine if checks written to this subject between 2015-2017 violated PAC Guidelines or if the 2018 was compensation for services after the subject was elected to the PAC Board.

Therefore, this allegation was deemed not sustained.

# Hiring Compliance Monitoring Activity

The OIG reviews and monitors the Park District's hiring and assignment determinations from the quarter to ensure that the actions comply with the Employment Plan. The OIG reports on its compliance-monitoring activities in each of its quarterly reports.

## Review of Exempt List Modifications

The 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 to the Exempt List were approved in the Third Quarter of 2022:

- Positions added to the Exempt List (3)
  - Chief of Staff, General Superintendent
  - Chief of Staff, Board of Commissioners
  - Director of the Office of Protection and Accountability
  
- Positions removed from the Exempt List (5)\*
  - Director of Human Resources
  - General Counsel
  - General Superintendent and CEO
  - Secretary to the Board of Commissioners
  - Treasurer

\*The hiring procedures for these five positions are provided by Park District Code or by state statute, rather than by the Park District's Employment Plan.

## Review of Exempt Manager Hires

- HR reported three internal promotions to exempt positions during the Third Quarter of 2022:
  - Deputy Chief Program Officer
  - Director of Information Technology
  - First Deputy General Counsel

## 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.

HR did not submit any “no consensus” letters during the Third Quarter of 2022.

## 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 Third Quarter of 2022.

## Arbitrations and Grievances

The OIG audits arbitrations and grievances involving hiring, promotions, transfers, or allegations of unlawful political discrimination. The OIG did not receive any notifications from HR of any arbitrations during the Third Quarter of 2022. The OIG learned that there had been eight grievances.

## Review of “Acting Up” Activity

The OIG reviews each circumstance when an employee “acts up” (performing all or substantially all of the duties of an employee in a higher-paid classification). Activity in the Third Quarter of 2022 showed that, on ninety (90) instances, employees had “acted up,” and eighty-seven (87) instances where an employee who had been in “acting up” status was placed back in his/her position or promoted.

## Monitoring Contacts by Hiring Departments

The OIG reviews all reported or discovered instances where hiring departments contacted HR to improperly 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 did not report any improper contacts by hiring departments for the Third Quarter of 2022.

## Hiring Sequence Audits

Each quarter, the OIG audits a sample of recent hires to ensure compliance with the Park District's Employment Plan.

The Hiring Compliance Officer (HCO) completed one hiring sequence audit in the Third Quarter. Four audits are pending.

### #2200418 Security Guard

- Applicants: 228
- Qualified candidates: 203
- Candidates interviewed: 169

Note: The HCO found that that the Park District's hiring activities for this position were in compliance with the Employment Plan.

## Hiring Compliance Advisories

As part of the duties and responsibilities under the Park District's Employment Plan, the Hiring Compliance Officer (HCO) is required to perform oversight activities of the hiring process and to participate in "the development, recommendation and implementation of necessary policy and operating changes." (See Section XI, A of the Employment Plan) The OIG issued six hiring compliance advisories in the Third Quarter of 2022.

### RECLASSIFICATION OF POSITION

A department requested that the HCO provide an opinion as to whether or not an employee's position could be reclassified to another job title without posting the position for other applicants. The HCO reviewed the job descriptions and Employment Plan and determined that the Plan required that the job be posted in order to fill the vacancy.

### TIE-BREAKER PROCEDURE

HR proposed amending the procedure for tie-breakers (in the event two or more applicants received the top rating). Rather than using different methods for internal and external applicants, HR proposed using the applicants' job application number, rather than personal information, for the tie-breaker randomized selection process. The HCO agreed to the change.

### JOB DESCRIPTION CHANGES

Pursuant to the Park District's Employment Plan, significant changes to an existing job description (minimal qualifications, job responsibilities, etc.) must be approved by the HCO.

An existing position in the Finance Department had been vacant for years. In order to update the job description to ensure that it was relevant to current needs, the proposed changes were submitted to the HCO. The HCO reviewed and approved the proposed changes.

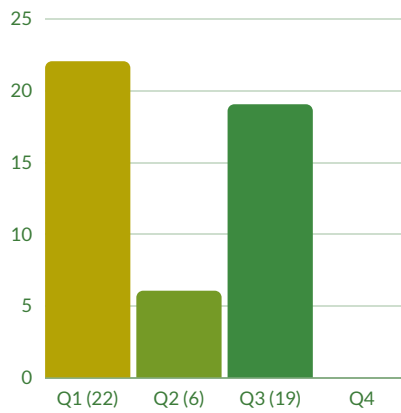
The HCO reviewed two proposed job description changes for positions in other departments. The suggested changes related to the specific duties in those departments and did not alter the minimum qualifications. The HCO approved the customized job descriptions.

The HCO also reviewed the Employment Plan to determine if the Plan requires that the HCO approve changes to the job descriptions for appointed or exempt employees. The HCO found that the Employment Plan does not provide procedures for revising job descriptions for these employee classifications. The OIG, the HCO, and Park District administrators are reviewing possible amendments to the Employment Plan to ensure that changes to these job descriptions are subjected to review and oversight.

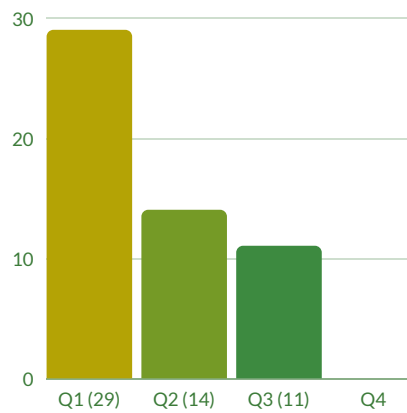
# Quarterly Information

## INVESTIGATIONS

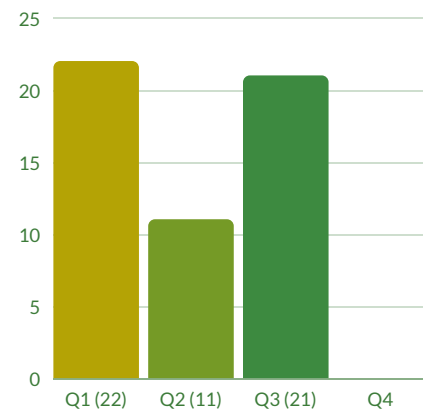
OPENED (19)



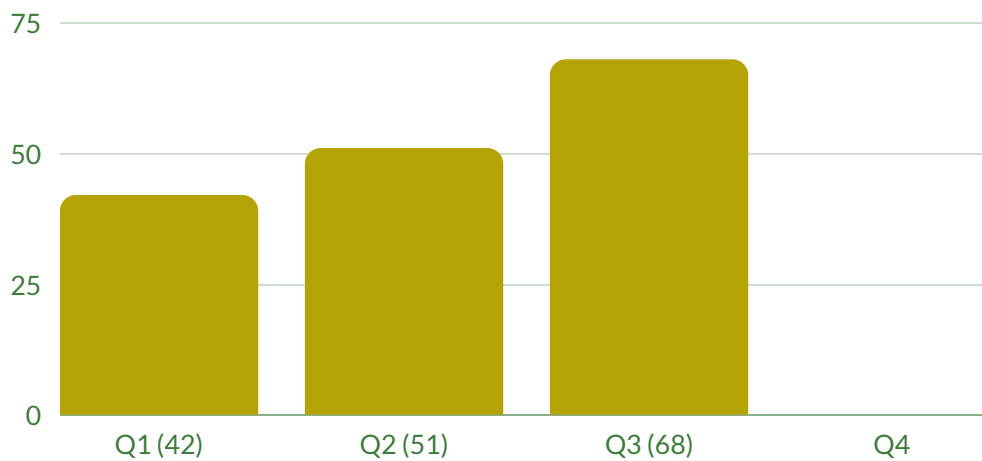
CLOSED (11)



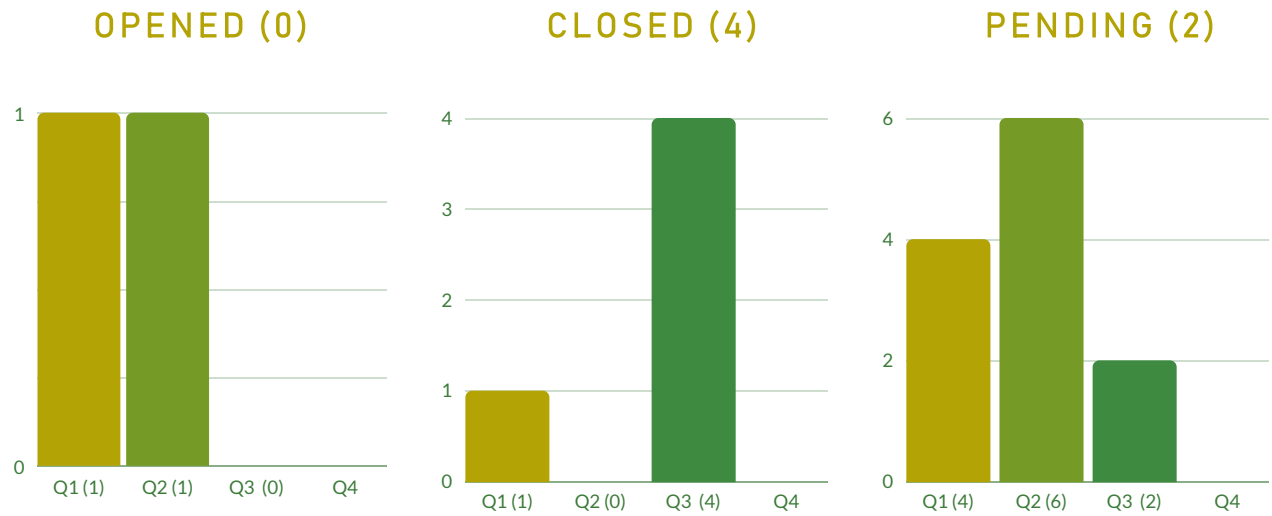
PENDING (21)



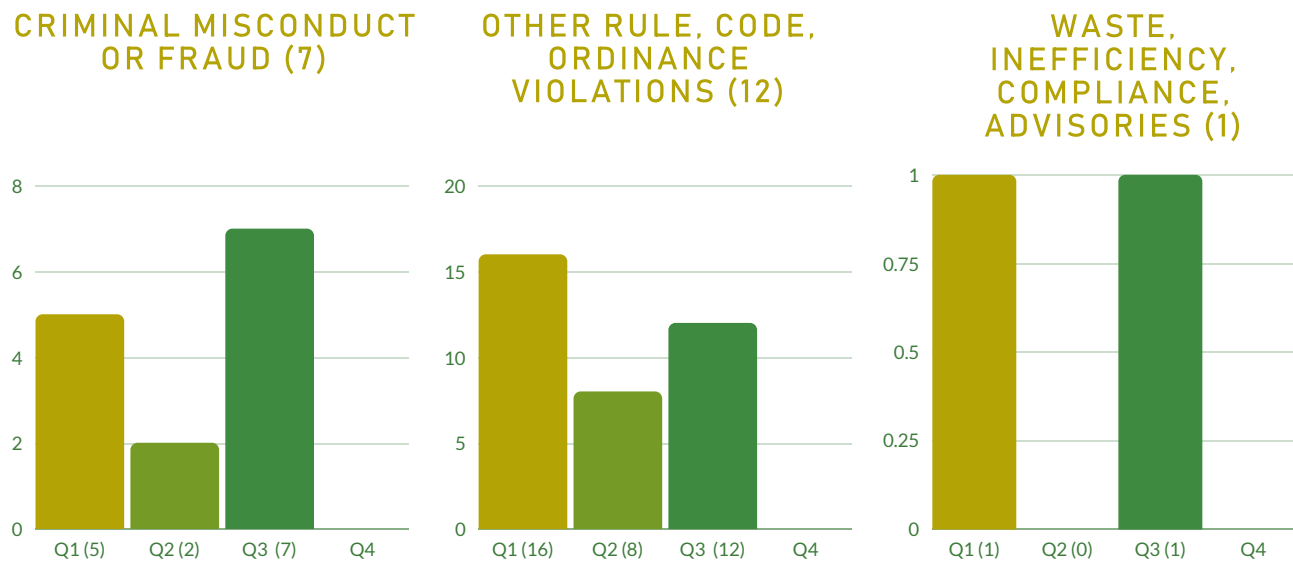
## COMPLAINTS RECEIVED



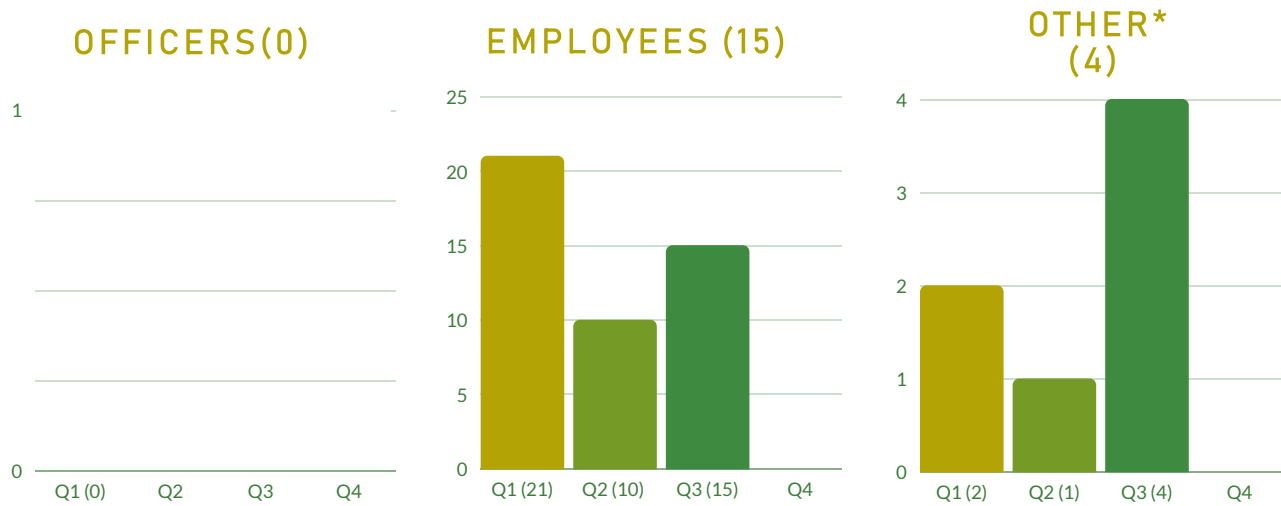
# AUDITS



# TYPES OF INVESTIGATIONS AND REVIEWS

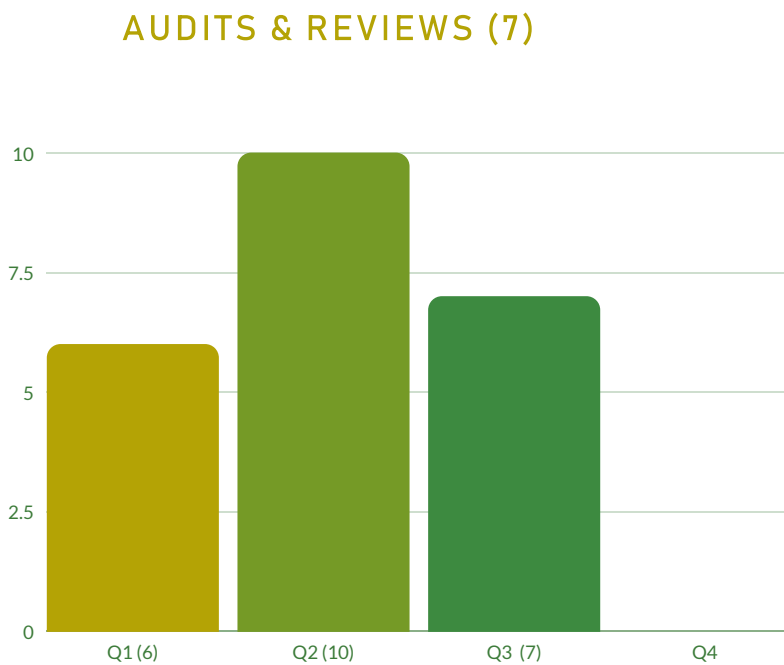


# INVESTIGATED AND REVIEWED PARTIES

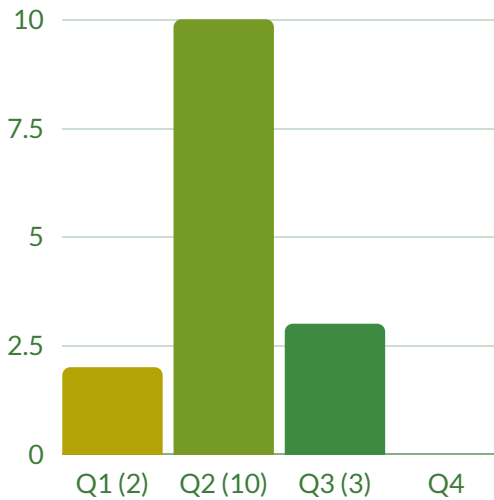


\*Other includes agents, volunteers, concessionaires, contractors, and unknown parties.

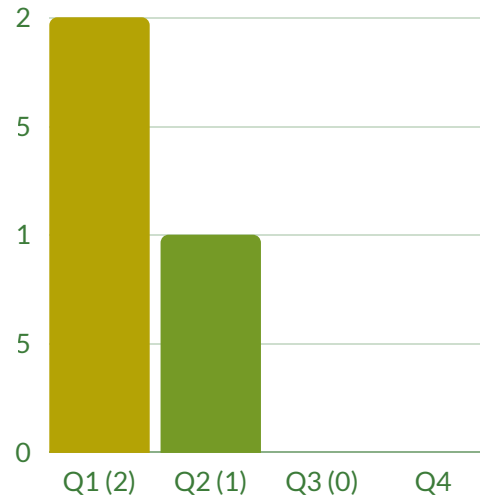
# HIRING COMPLIANCE



## INTERNAL ASSISTS



## EXTERNAL ASSISTS



Internal Assists are OIG actions in response to department requests for information, analysis, and/or other assistance.

External Assists are OIG actions in response to requests from outside of the Park District (e.g., law enforcement agencies) for information, analysis, and/or other assistance.

## MATTERS PENDING OVER SIX MONTHS

Chapter 2, Subsection D(9) of the Chicago Park District Code states 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 pending matter, as well as the reason for its continuing pending status, is listed below:

CASE NUMBER	MATTER TYPE	NATURE OF ALLEGATION/REVIEW	REASON
22Q10001	AUDIT	COMPLIANCE	AVAILABLE TIME AND RESOURCES
22Q20074	AUDIT	COMPLIANCE	AVAILABLE TIME AND RESOURCES