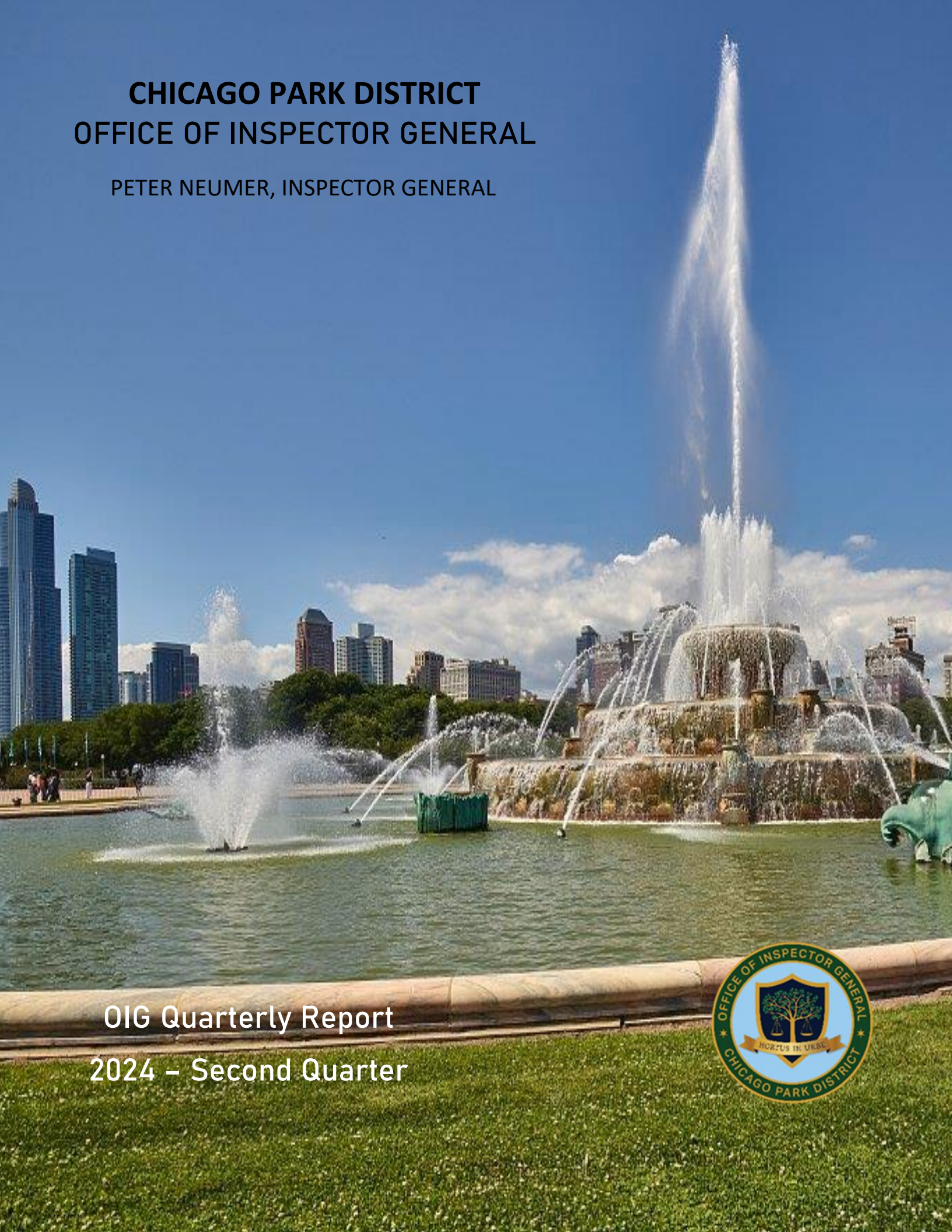


# CHICAGO PARK DISTRICT OFFICE OF INSPECTOR GENERAL

PETER NEUMER, INSPECTOR GENERAL



OIG Quarterly Report  
2024 – Second Quarter



## Message from the Inspector General:

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

In the second quarter of 2024, the Office of the Inspector General (OIG) continued to carry out a systematic review of allegations of Paycheck Protection Program (PPP) loan fraud, issuing 21 investigative reports that made substantiated findings of fraud against Park District employees.

The OIG also issued three hiring compliance reports, including a report providing an update on the Park District's efforts to achieve full compliance with the Park District Employment Plan's training requirements. That report details the OIG's creation of an Employment Plan training for Park District interviewers, which was posted and made available to staff in June 2024, through Success Center, the Park District's learning management system.

In addition, with respect to internal procedures, the OIG finalized its complaint intake directive, which sets forth the OIG's procedures for timely processing complaints and also details the OIG's various reporting requirements, and issued a directive documenting the OIG's procedures for conducting the hiring sequence audits required by the Park District Employment Plan.

In the final two quarters of the 2024, the OIG will continue to develop its policies and procedures while carrying out its important compliance and oversight functions.

Sincerely,

Peter Neumer  
Inspector General  
Chicago Park District Office of the Inspector General

# Table of Contents

**Office Overview, p. 1**

**Investigative Metrics, p. 2**

**Investigative Report Summaries p. 5**

**Audit and Review Metrics and Summaries, p. 10**

**Hiring Compliance Activity, p. 12**

**Matters Pending Over Six Months, p. 19**

## Office Overview

### Mission

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

- Investigating allegations of fraud, waste, and abuse or 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 is \$1,008,565.

### Personnel

At the end of the second 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

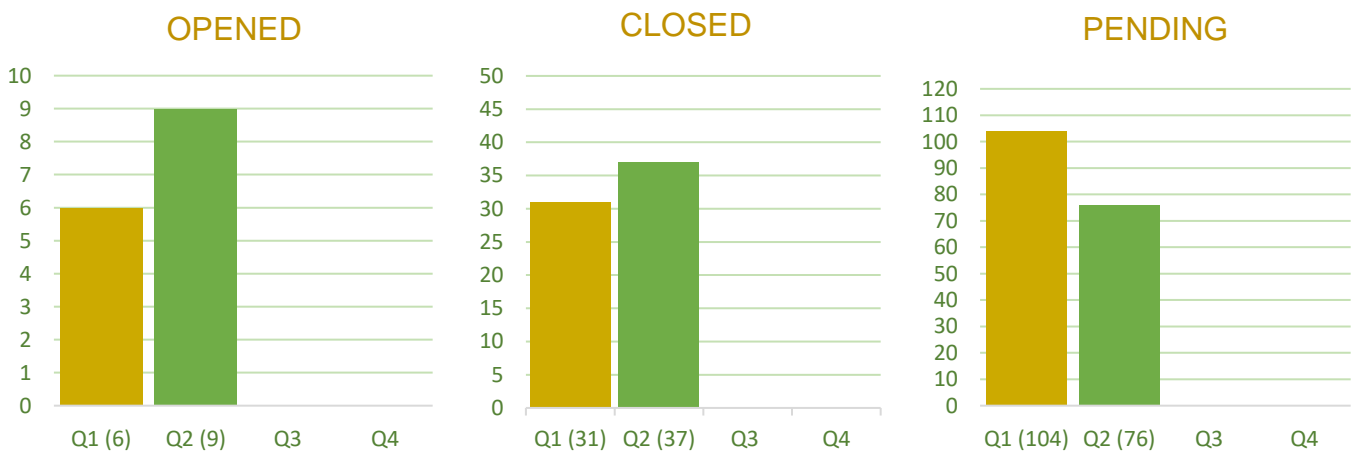
Reports of fraud, waste and abuse can be made to the OIG in multiple ways:

- 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

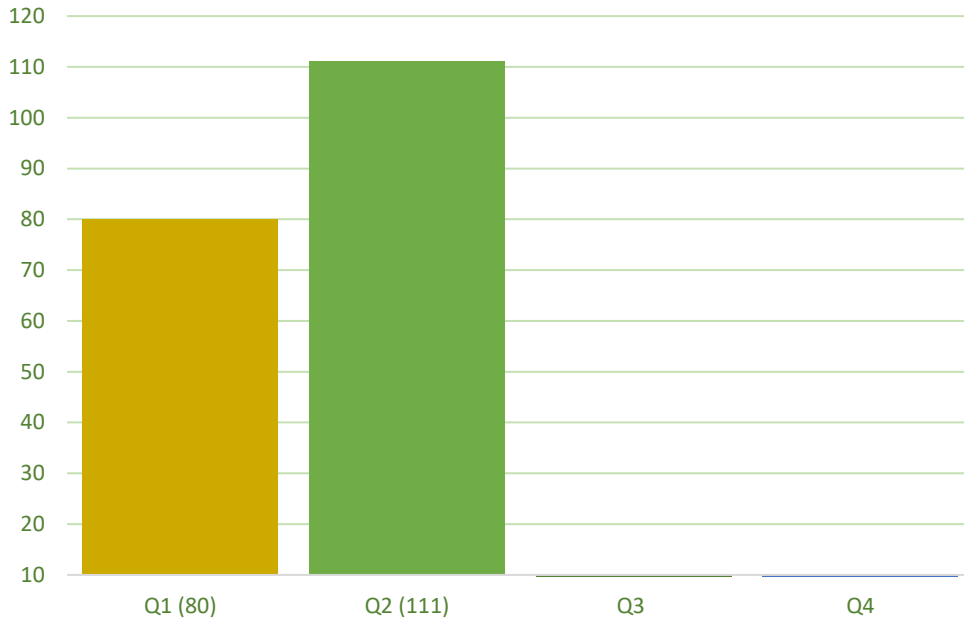
## FY24 First Quarter Investigative Metrics

As the below charts reflect, the OIG opened 9 investigations in the second quarter of FY24 and closed 37 investigations. Of the 9 investigations the OIG opened in the second quarter of FY24, 3 involved potential criminal misconduct or fraud, 3 involved other rule, code or ordinance violations, and 3 involved waste, inefficiency or compliance. With respect to those 9 investigations, 6 concern the conduct of employees, zero concern the conduct of officers, and 3 concern “other” parties (i.e., patrons, agents, concessionaires, contractors, partners or unknown parties). The OIG has 76 pending investigations, down from 104 in the first quarter of FY24. The OIG received 111 complaints in the second quarter of FY24.

### INVESTIGATIONS



## COMPLAINTS RECEIVED\*



\* "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 AND REVIEWS OPENED



## INVESTIGATED AND REVIEWED PARTIES



## FY24 Second Quarter Investigative Summaries

### PPP Investigations

In the second quarter of 2024, the OIG completed 21 investigations that resulted in sustained findings of PPP fraud and 1 investigation that resulted in a sustained finding of a dual employment policy violation. More specifically:

- In 22-0287, the OIG recommended that a non-supervisory Human Resources employee be discharged and placed on the ineligible for rehire list for fraudulently obtaining a PPP loan and then submitting forged documents to the OIG in an effort to conceal their misconduct. Following the issuance of the OIG's report, the employee resigned and was placed on the ineligible for rehire list.
- In 23-0030, the OIG recommended that an Activities 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 receipt of those loan proceeds during their OIG interviews. Management's response to the OIG's report and recommendation is due on July 22, 2024.
- In 23-0040, the OIG recommended that a Recreation Leader 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 during their OIG interviews. Following the issuance of the OIG's report, the employee resigned and was placed on the ineligible for rehire list.
- In 23-0068, the OIG would have recommended discharge for a Security Guard for fraudulently obtaining a PPP loan, but the employee resigned prior to the issuance of the OIG's report. Accordingly, the OIG recommended that Management: (1) designate the employee as Resigned under Inquiry; and (2) include a copy of this report in the employee's personnel file, so that if they apply for re-employment with the Park District, the report can be considered before any decisions are made with respect to their application. In response, HR stated that they marked the employee as ineligible for rehire and would refer to the OIG's report in the event that the employee applied for Park District re-employment.
- In 23-0075, the OIG would have recommended discharge for a Camp Counselor for fraudulently obtaining a PPP loan and then repeatedly lying to the OIG about their application for and receipt of those loan proceeds during their OIG interviews, but the employee's Park District employment ended prior to the issuance of the OIG's report. Accordingly, the OIG recommended that Management include a copy of the OIG's report in the employee's personnel file, so that if they apply for re-employment with the Park District, the report can be considered before any decisions are made with respect to their application. In response, HR stated that they marked the employee for review in the event they apply for re-employment.

- In 23-0080, the OIG recommended that a Playground Supervisor 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 23-0105, the OIG would have recommended discharge for a Recreation Leader for fraudulently obtaining a PPP loan, but the employee's Park District employment ended prior to the issuance of the OIG's report. Accordingly, the OIG recommended that Management include a copy of the OIG's report in the employee's personnel file, so that if they apply for re-employment with the Park District, the report can be considered before any decisions are made with respect to their application. In response, HR stated that the employee was marked as ineligible for rehire and that HR would refer to the OIG's report in the event that the employee applied for Park District re-employment.
- In 23-0126, the OIG would have recommended discharge for a Laborer for fraudulently obtaining a PPP loan, but the employee's Park District employment ended prior to the issuance of the OIG's report. Accordingly, the OIG recommended that Management include a copy of the OIG's report in the employee's personnel file, so that if they apply for re-employment with the Park District, the report can be considered before any decisions are made with respect to their application. In response, HR stated that the employee was marked as ineligible for rehire and that HR would refer to the OIG's report in the event that the employee applied for Park District re-employment.
- In 23-0195, the OIG recommended that a Laborer 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 they will be placed on the ineligible for rehire list.
- In 23-0201, the OIG would have recommended discharge for a Camp Counselor for fraudulently obtaining a PPP loan and then repeatedly lying to the OIG about their application for and receipt of those loan proceeds during their OIG interviews, but the employee's Park District employment ended prior to the issuance of the OIG's report. Accordingly, the OIG recommended that Management include a copy of the OIG's report in the employee's personnel file, so that if they apply for re-employment with the Park District, the report can be considered before any decisions are made with respect to their application. In response, HR stated that the employee had been marked as ineligible for rehire and that HR would refer to the OIG's report if the individual applies for Park District re-employment.
- In 23-0299, 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 during their OIG interviews. Following the issuance of the OIG's report, the employee resigned and was placed on the ineligible for rehire list.

- In 23-0338, the OIG recommended that a Park Supervisor be discharged and placed on the ineligible for rehire list for fraudulently obtaining two PPP loans. Management's response to the OIG's report and recommendation is due on July 24, 2024.
- In 23-0347, 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 application for and receipt of those loan proceeds during their OIG interviews. Management's response to the OIG's report and recommendation is due on July 29, 2024.
- In 23-0350, the OIG recommended that a Laborer 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 they will be placed on the ineligible for rehire list.
- In 23-0351, 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 application for and receipt of those loan proceeds during their OIG interviews. Following the issuance of the OIG's report, the employee resigned and was placed on the ineligible for rehire list.
- In 23-0352, the OIG recommended that a Physical Instructor be discharged and placed on the ineligible for rehire list for fraudulently obtaining multiple PPP loans and then failing to cooperate with the OIG during its investigation of the PPP fraud. In response, HR stated that the employee had been terminated shortly prior to the issuance of the OIG's report for unrelated reasons. HR further noted that the employee had appealed that termination and that HR would forward the OIG's report to the Law Department and recommend that the charges for termination be amended to include the violations identified in the OIG's report.
- In 23-0472, the OIG investigated an allegation that a Senior Program Specialist engaged in PPP loan fraud. OIG's investigation did not establish that the employee committed PPP fraud, as the evidence reflected that the employee operated a legitimate business at the time they received two PPP loans and the OIG could not establish by a preponderance of the evidence that the employee falsified the information they submitted in their applications for those loans. However, the evidence did establish that the employee violated the Park District's secondary employment policy by failing to make the required reports and obtain the necessary approvals regarding their business when they became a Park District employee. 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 counseling, advised them of the Dual Employment policy and requirements and advised them to fill out the Dual Employment form to have on file in accordance with the policy.

- In 23-0473, the OIG would have recommended discharge for a Physical Instructor 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 this report in the employee’s personnel file, so that if the employee applies for re-employment with the Park District, the report can be considered before any decisions are made with respect to the employee’s application. In response, HR stated that the employee had been marked as ineligible for rehire.
- In 23-0477, the OIG recommended that a Laborer 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 during their OIG interviews. Following the issuance of the OIG’s report, the employee was discharged and they will be placed on the ineligible for rehire list.
- In 23-0508, the OIG recommended that a Laborer 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 23-0515, 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 this report in the employee’s personnel file, so that if the employee applies for re-employment with the Park District, the report can be considered before any decisions are made with respect to the employee’s application. In response, HR stated that the employee had been marked as ineligible for rehire and that HR would refer to the OIG’s report if they applied for Park District re-employment.
- In 23-0554, the OIG recommended that a Physical Instructor be discharged and placed on the ineligible for rehire list for fraudulently obtaining two PPP loans and then lying to the OIG about their application for and receipt of those loan proceeds during their OIG interviews. Following the issuance of the OIG’s report, the employee resigned and they will be placed on the ineligible for rehire list.

With respect to 5 other PPP cases (23-0519, 23-0521, 23-0536, 23-0537, and 23-0539), the subject employees ended their Park District employment before the OIG materially started its investigations. In those matters, the OIG issued a report recommending that Management flag those former employees for review so that if they applied for re-employment, HR could notify the OIG. Upon notification, the OIG would re-open its investigation and make a final determination as to whether the person engaged in fraud. In each of the five cases, Management subsequently placed the former employee in “review” status.

## Other Investigations

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

### **23-0417 – Unauthorized Acquisition of Personally Identifying Information**

In 23-0417, the OIG’s investigation established that a Park District Laborer violated the Park District’s Code of Conduct by intentionally and without authorization using their phone to take a photo of another Park District employee’s direct deposit form, which contained the employee’s social security number among other personal identifying information, while the form was on a Labor Foreman’s desk. The evidence further established that the Laborer made a statement while taking the photo—“if he messes with me”—that suggested that the Laborer sought the information for potentially unlawful purposes.

The OIG would have recommended discharge for the Laborer, but they were no longer a Park District employee at the time the OIG issued its report and had already been designated as ineligible for rehire for reasons unrelated to the OIG’s investigation. Accordingly, the OIG recommended that the Park District include a copy of this report in the Laborer’s personnel file. The OIG further recommended that the Labor Foreman be provided additional training regarding the handling of sensitive documents. Although the OIG did not substantiate the allegation of negligent handling of Park District property against the Labor Foreman because the evidence reflected that the documentation was left on their desk when they were not present and it was not clear how much time transpired between the leaving of that documentation and the Laborer’s taking of a photo, additional training could reduce the likelihood of a similar event occurring in the future. Finally, the OIG recommended that the Park District’s Department of Cultural and Natural Resources review its policies related to the maintenance and transmission of sensitive documents, such as direct deposit forms, to see if any feasible improvements could be made to those procedures with respect to securing such documents.

In response, HR stated that the Laborer had already been designated as ineligible for rehire and that if they applied for re-employment, HR would refer to the OIG’s report prior to consideration of employment. The Department of Cultural and Natural Resources stated in response that they had spoken with the Labor Foreman, explained that any form with someone’s personal information needed to be put in a sealed envelope and sent to HR and that the Department would also have a meeting with all of the foremen and operations supervisors explaining this procedure again.

## Park District Responses to Previously Issued Investigative Reports

In the second quarter of FY24, the Park District responded to three investigative reports that the OIG issued in the first quarter of FY24: 22-0191, 23-0300, and 23-0469.

In 22-0191, the OIG recommended that a Physical 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 resigned and was placed on the ineligible for rehire list.

In 23-0300, the OIG recommended that an Inclusion Aide 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 23-0469, 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.

## Audit and Review Summaries

The OIG's Audit Department issued 1 audit report in the second quarter of FY24 (23-0217), closed 2 audits without issuing a report (23-0248 and 23-0490) and opened 2 audits (24-0118 and 24-0147). The OIG has six pending audits and no pending reviews.

In 23-0217, the OIG conducted a review of the Park District's payroll processes. As part of that review, the OIG interviewed the Park District's Payroll Manager and Treasurer and obtained and reviewed Park District documentation related to payroll, including the Park District's payroll policy. The purpose of the OIG's review was to identify and explain the processes and procedures the Park District has in place that are intended to facilitate the timely payment of year-round and seasonal employees.

Based on its review, the OIG made three recommendations for the Payroll department:

- The payroll policy the Payroll department provided to OIG was undated and did not reflect recent changes to payroll policy. OIG therefore recommended that the Payroll department date its policy document and note the dates of revision to that policy going forward, as dating a policy and noting revision dates allows for the easier tracking of policy changes and helps ensure that the policy is kept up to date.
- In the check collection process, OIG found that area managers and supervisors collect checks on behalf of their employees but do not record which employees' checks they are picking up. To enhance accountability and transparency, OIG recommended that the Payroll department consider, if feasible, creating a system wherein area managers and supervisors would sign off as to which specific employees' checks they collected for distribution, including possibly having a sign-off sheet containing a printed list of employees' names. Such a step could help minimize the likelihood of an oversight in the check collection process, and thus better ensure that Park District employees receive their checks promptly and without delay.

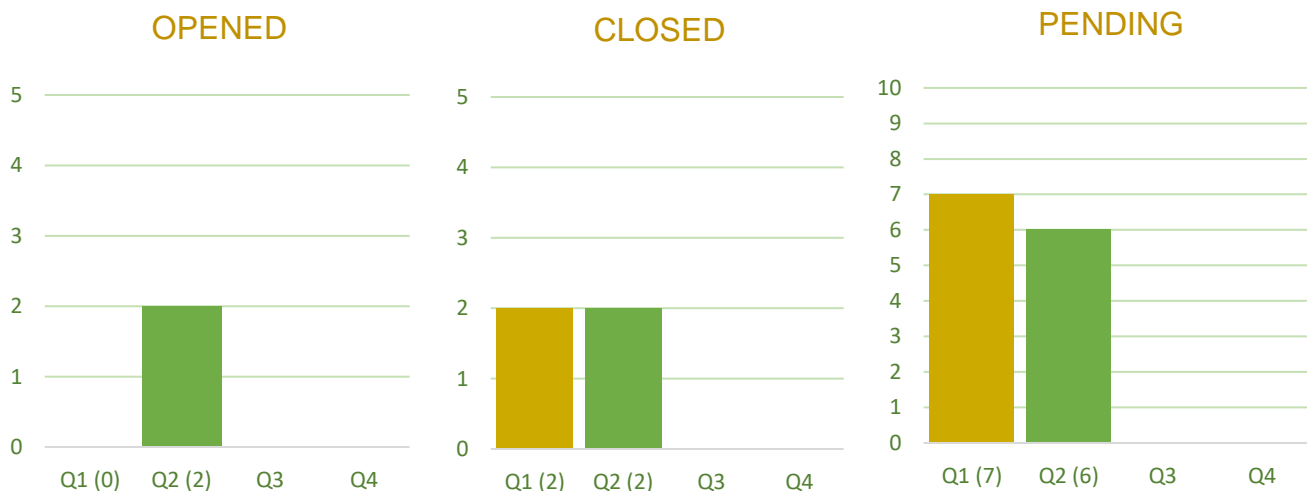
- At the present time, the Payroll department does not systematically track all the manual corrections requested through payroll correction/adjustment forms. The OIG therefore recommended that the Payroll department consider implementing a payroll correction tracking process, possibly through the use of a spreadsheet, that would allow the department to identify patterns and trends in payroll errors or issues over time. Such tracking and analysis could help the department better comply with existing policies, improve overall efficiency and accuracy in payroll management and identify possible beneficial modifications to the payroll system.

In response to the OIG’s draft report containing the above-detailed recommendations, the Payroll department stated that the report looked accurate and that the department did not have any other comments or recommendations. The Payroll Department did not state whether or not they accepted and would implement the OIG’s recommendations.

With respect to 23-0248, which involved a review of the Community Recreation Department’s processes for allocating resources, including sports fields, the OIG, during the preparation of the FY24 OIG Audit Plan, determined that the project was still in its beginning stages and that other projects were of a higher priority than 23-0248. Accordingly, the OIG closed 23-0248 without issuing a report and included it in the FY24 Audit Plan for consideration as a project later in the year.

Regarding 23-0490, which involved a follow-up audit of the OIG’s most recent audit of the Park District’s Summer Food Camp Program for Children, the OIG closed the audit and opened project 24-0118 on the same subject matter because OIG determined that at the present time it is more appropriate for OIG to conduct a holistic review of all the audit findings that have been made regarding the program over the last decade, than to conduct a narrower follow-up audit.

## AUDITS AND REVIEWS



## 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.

### FY24 Second Quarter Hiring Compliance Report Summaries

In the second quarter of FY24, the OIG issued three hiring compliance reports (24-0168, 23-0139 and 23-0274):

- In 24-0168, the OIG provided an update to OIG Hiring Compliance report 23-Q4-0597, in which the OIG found that the Park District was not in full compliance with the training requirements set forth in the Employment Plan. More specifically, in 24-0168, the OIG reported that it had finalized an Employment Plan training for Park District interviewers and posted that training on Success Center, the Park District's learning management system, making it available for Park District staff.

Accordingly, the OIG recommended that HR work with the various Park District departments to identify the employees that are required to receive the newly-created interviewer training and take action sufficient to ensure that by September 30, 2024, only employees who have received their interviewer training certification are serving as interviewers.

The OIG further recommended that HR develop its own training regarding "proper interviewing conduct, techniques and requirements" and ensure that all appropriate employees receive that training. Management's response to OIG's report and recommendations is due on August 12, 2024.

- In 23-0139, the OIG concluded an investigation concerning a former Park District employee's allegation that they were unfairly denied promotions by the Park District. The OIG's investigation established that the Park District did not fully comply with the procedural requirements of the Park District Employment Plan in filling several vacancies for which the former employee was a candidate. More specifically, the evidence reflects that on multiple occasions, interview rating forms were not signed and collected immediately following the interviews for multiple positions, as required by the Employment Plan. In addition, because at the time of the report, no Park District employees had their interview training certification, for the hiring sequences detailed in the report, the Park District was not in compliance with the requirement that only certified employees participate in interview panels. However, the OIG did not find any evidence that these violations of the Employment Plan materially affected the fairness of any hiring sequence pertaining to the former employee.

With respect to the procedural violations of the Employment Plan, the OIG noted that since the conclusion of the hiring sequences detailed in the OIG's report, 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. However, the OIG has also recently issued two reports (23-0597 and 24-0168), detailing how the Park District is not yet in full compliance with all of the Plan's training requirements at the present time. Accordingly, to reduce the likelihood of such Employment Plan violations recurring, the OIG recommended that the Park District continue to develop and implement all required trainings related to hiring and interviewing.

Finally, the OIG recommended that HR take action sufficient to ensure that following the completion of a hiring sequence, Taleo, the Park District's career website, is appropriately updated to reflect the completion of that sequence. Although not necessarily violative of the Employment Plan, with respect to the hiring sequences relevant to the complainant's allegations, on multiple occasions Taleo indicated that a hiring sequence was still ongoing, even after a candidate had been selected. Management's response to OIG's report and recommendations is due on August 14, 2024.

- In 23-0274, the OIG investigated an allegation that the Park District hired a candidate for a Director position who did not meet the minimum qualifications for the position, thereby violating Section VII(A)(2) of the Park District Employment Plan. The OIG's investigation established that the candidate the Park District hired to fill the Director position did possess the minimum qualifications for the position. Accordingly, the OIG determined that the allegation that the hiring sequence violated Section VII(A)(2) of the Employment Plan was unfounded. 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, Management was not required to respond to the OIG's report.

## Park District Responses to Previously Issued Hiring Compliance Reports

In the second quarter of FY24, the Park District responded to one hiring compliance report that the OIG issued in the first quarter of FY24: 23-0578.

In 23-0578, the OIG found that the Park District was not in compliance with the Park District Employment Plan's requirement that job descriptions for each Park District job title be publicly posted on the Park District's website. Accordingly, the OIG recommended that the Park District's HR department take appropriate steps to post complete and accurate job descriptions for each Park District job title on the Park District's website, as such posting serves an important transparency function for the Park District and its patrons. The OIG specifically noted in that report that it did not proceed with the issuance of the report until determining that the public posting

provision serves an important function and is in place and being followed by at least one other local governmental entity, namely the City of Chicago.

The Park District's response to the OIG's report stated in relevant part as follows:

Section V(E) of the Plan states that job descriptions for each Park District job title must be publicly posted on the District's website. The OIG states that it has determined that the District is not presently in compliance with this provision, and recommends that the Human Resources Department (HR) take steps to come into compliance with this provision of the Plan. The OIG has also noted that complying with Section V(E) as currently provided "will likely require material technological and personnel resources to complete, the OIG understands that the Park District may require more than 30 days to carry out this recommendation."

Along with posting notices of hiring for currently open positions, the posting of other job titles and descriptions serves to promote interest in, and provide easy public access to, potential possibilities of employment with the Park District. There is a wide range of types of positions filled or vacant at any given time, everything from recreation related jobs to facilities management, to landscape and horticulture, to financial, budget and asset management to communications and much more. Full time Park District jobs come with competitive benefits including a pension, a comprehensive health care plan and a progressive parental leave policy. What may be most helpful to the public interested in knowing what sorts of positions are available from time to time is to post descriptions of those positions that are among the most numerous across all major areas of Park District activity and are currently budgeted rather than post each position for which a job description exists. There is not necessarily a current process to eliminate or sunset job descriptions, and so many more exist than are typically filled year to year. Because certain positions may not have been budgeted for any number of years, their existence is irrelevant to an inquiry about what jobs might be available now or in the near future, and therefore of questionable informational value to the public. Posting all existing job descriptions would likely lead to a misunderstanding as to job titles likely to be filled.

As has been noted by the OIG in several recent findings of non-compliance with the Plan including in this case, there is an ongoing collaborative review of the Plan (first adopted in 2014 and not revised since then) between HR and the OIG to update it as needed to make sure it serves the purposes of fair processes and transparency in all personnel matters as envisioned by the initial adoption of the Plan. At the same time, it is also important to determine whether an unintended consequence of the Plan is that it unnecessarily causes resources of personnel time, effort and expense to be devoted to compliance with certain provisions that do not actually further the overall goals of the Plan. This review effort is still underway, and Section (V) is one of the those expected to be considered for revision.

The Park District's full response to the OIG's 23-0578 report can be found here: <https://assets.chicagoparkdistrict.com/s3fs-public/documents/about%20us/OIG/2024/Supt.%20Response%20Letters/Supt%20Response%20to%20OIG%2023%20Q4-0578.pdf>

## Hiring Sequence Audit Reports

In the second quarter of FY24, the OIG issued four hiring sequence audit reports (24-0094, 24-0098, 24-0099, and 24-0002):

- In 24-0094, the OIG conducted an audit of the hiring sequence for an hourly Physical Instructor position. The OIG determined that the Park District posted a job description that omitted certain qualifications that are included in the most recently updated job description for the position in violation of Section VI(C)(1) of the Employment Plan, failed to correctly screen candidates for minimum qualifications as required by Section VI(H)(1), and selected the second-highest rated candidate for the position without documenting the highest ranked candidate's non-acceptance of the position, in contravention of Section VI(L)(3).

In addition, the employees who interviewed candidates for this position did not receive training prior to those interviews as required by Section V(C)(3). As described in greater detail in OIG Hiring Compliance Reports 23-0597 and 24-0168, although the OIG, as of June 2024, finalized a training for interviewers regarding the Employment Plan and made that training available for Park District staff, eligible interviewers had not yet begun receiving that training. Therefore, the record did not reflect that the interviewers received such training or certification prior to conducting the interviews for this hiring sequence. The OIG further noted that in its 24-0168 report the OIG recommended that the HR department work with the various Park District departments to identify the employees that are required to receive the newly created interviewer training and take action sufficient to ensure that by September 30, 2024, only employees who have received their interviewer training certification are serving as interviewers. Accordingly, the OIG stated that in the fourth quarter of the 2024 fiscal year, it would, as part of its hiring sequence audit process, issue findings of non-compliance, as appropriate, in cases in which employees who have not completed their interviewer certification serve as interviewers. The OIG further noted that it would continue to monitor the Park District's progress toward full compliance with Section V(C)(3) of the Plan.

The OIG did not identify any evidence that suggested that the above-described violations ultimately resulted in the selection of an unqualified candidate.

- In 24-0098, the OIG conducted an audit of the hiring sequence for a Physical Instructor position. The OIG determined that while the Park District generally complied with the

Employment Plan’s requirements, the employees who interviewed candidates for this position had not received training in compliance with Section V(C)(3) of the Plan.

- In 24-0099, the OIG conducted an audit of the hiring sequence for an Attendant position. The OIG determined that while the District generally complied with the Employment Plan’s requirements, (1) the same interviewers were not used for all interviews for this vacancy, as required by Section VI(K)(3), and (2) the employees who interviewed candidates for this position had not received training in compliance with Section V(C)(3) of the Plan.
- In 24-0002, the OIG conducted an audit of the hiring sequence for a Special Recreation Instructor position. The OIG determined that HR did not prepare a Minimally Qualified List as required by Section VI(H)(1) of the Plan, and the employees who interviewed candidates for this position did not receive training prior to those interviews in compliance with Section V(C)(3).

## 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 was one addition to the Exempt List in the second quarter of 2024:

- Director of Aquatics – Community Recreation Department

There was one deletion from the Exempt List in the second quarter of 2024:

- Director of Capital Construction

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 second quarter of 2024.

## Review of Exempt Management Hires

Human Resources reported two exempt hires during the second quarter of 2024:

- Area Manager (two positions)

## Monitoring Contacts by Hiring Departments

Pursuant to the Employment Plan, the OIG is to review 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 improper contacts by hiring departments for the second quarter of 2024.

## 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 second quarter of 2024 reflected 184 instances of employees “acting up” and 4 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 first 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 five grievances were filed during the second quarter of 2024. The OIG reviewed those grievances and determined that four of those grievances did not involve Employment Plan-related issues. The OIG will monitor the proceedings involving the fifth grievance, which involves a complaint regarding the notice provided with respect to the posting of certain vacant union positions. 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 second quarter, the OIG was consulted on five matters and rendered advisory opinions on issues that arose pertaining to implementation or interpretation of the Employment Plan.

Most notably, the OIG was asked to review proposed amendments to the Employment Plan. The amendments primarily relate to the processes for hiring seasonal employees and can be viewed here: [24.04.14 Chicago Park District Employment Plan Redline.pdf](#)

In its April 17, 2024 response memo for matter 24-0110, the OIG noted that it approved the proposed amendments, but that it objected to the proposed 7-day notice period. More specifically, the OIG stated that although a 7-day posting period may not technically violate the Employment Plan, as the Plan does not specify a minimum posting period, the OIG did not believe that such a brief posting period comported with the spirit of public notice periods generally. The OIG pointed to the City of Chicago Employment Plan, which requires 30 days of public notice prior to any plan modification. The Park District ultimately utilized a 30-day notice period for the proposed amendments and the General Superintendent approved the changes following the conclusion of that notice period. Pursuant to the Employment Plan, HR is to post the amended plan on the Park District's website.

## Matters Pending Over Six Months

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 pending matters, as well as the reasons for their continuing pending status, are set forth in the below chart.

As the chart makes readily apparent, the OIG is continuing to work through a substantial amount of PPP fraud investigations. Those high caseloads are presently having an impact on the timeliness of case completion, resulting in more cases than usual being open for more than six months. The OIG expects to see a significant reduction in these numbers by the end of 2024.

Case Number	Matter Type	Nature of Allegation	Reason
23-0055	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0070	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0174	Investigation	Criminal Conduct	Complex investigation – involves multiple allegations of theft
23-0193	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0202	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0206	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0208	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0216	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0218	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0249	Investigation	Hiring Compliance	Complex investigation – multiple allegations
23-0251	Investigation	Residency	Resource intensive investigation.

23-0252	Investigation	Residency	Resource intensive investigation.
23-0253	Investigation	Residency	Resource intensive investigation.
23-0256	Investigation	Time Falsification	Resource intensive investigation.
23-0270	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0275	Investigation	Residency	Resource intensive investigation.
23-0276	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0282	Investigation	Administrative Violations	Complex investigation – significant documents and several interviews required.
23-0315	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0316	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0317	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0341	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0345	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0346	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0355	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0359	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.
23-0382	Investigation	Administrative Violation	High caseload.

23-0409	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0410	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0416	Investigation	Time Falsification	Resource intensive investigation.
23-0467	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0468	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0501	Investigation	Administrative Violation	High caseload.
23-0503	Investigation	Hiring Compliance	Complex investigation – multiple allegations
23-0505	Investigation	Check Fraud	High Caseload.
23-0510	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0512	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0517	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0518	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0520	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.
23-0524	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0525	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0526	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.

23-0527	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0528	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.
23-0538	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0541	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0543	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0544	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0545	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.
23-0549	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0550	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0551	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.
23-0553	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.

23-0557	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0558	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0559	Investigation	Hiring compliance	Complex investigation – multiple allegations
23-0562	Investigation	Hiring compliance	High caseload.
23-0584	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.

# HELP FIGHT

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Call the **Park District Inspector General Hotline** to report any information regarding misconduct, unlawful activity, or prohibited behavior occurring within the **Chicago Park District**.

All calls and emails are confidential.

Thank you!



## Call **312.742.3333**

or email us at:

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