



Memorandum

To: Peter Neumer, Inspector General
Office of the Inspector General

From: Joan Coogan, Chief of Staff

Cc: Rosa Escareno, Superintendent and CEO
Argentene Hryzikos, Director of Human Resources

Date: December 24, 2024

Re: OIG Case No. 23-0249 -Local Records

The OIG, in its role as the Compliance Monitor, is authorized to receive and investigate complaints of alleged violations of the District's Employment Plan (Plan) and audit compliance with the Plan. This memo serves as the required management response from the Superintendent upon an OIG finding of non-compliance with the Plan in the case captioned above.

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.