

CHICAGO PARK DISTRICT
OFFICE OF INSPECTOR GENERAL

Quarterly Report
2025 | Q3

October 15, 2025



Peter Neumer | Inspector General

Message from the Inspector General

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

I want to extend my sincere thanks to the dedicated Office of Inspector General (OIG) staff for their efforts this quarter. As background, I was on parental leave for the majority of this quarter. And although I continued to work throughout that leave, my reduced hours undoubtedly put a strain on the OIG's employees, who were required to take on additional duties and responsibilities in order to ensure the office continued to be as responsive and timely as always with respect to its investigations of allegations of misconduct and reviews of Park District systems and procedures. I am therefore very grateful for their efforts, as they demonstrated the epitome of teamwork and professionalism.

The OIG also continued to produce reports with notable findings this quarter, including the following (for additional detail about these findings and recommendations, please see Sections II, III and IV of this quarterly report respectively):

- A Park District (District) Attendant violated the Park District's Code of Conduct by (1) engaging in the theft of private property while wearing District attire and while District records reflect the Attendant was on-duty, and (2) lying to the OIG about the theft during their subsequent OIG interview. Accordingly, the OIG recommended that the Park District discharge the Attendant and place them on the Park District's ineligible for rehire list. Management's response to the OIG's report is due October 23, 2025.
- The OIG conducted an audit of the District's offboarding process to determine if the District timely and appropriately revokes access to the District's IT applications when personnel separate, i.e., end employment. The OIG found that structural deficiencies in the District's offboarding process risk unauthorized access to sensitive or confidential information by separated personnel and made six recommendations for the District, including developing written policies and procedures governing access revocation, creating an inventory of users and IT applications, working with vendors to establish single sign-on credentials across applications, establishing a standard method for communicating separations, and ultimately ensuring timely and appropriate access revocation. The District agreed in part or in whole with each of the OIG's recommendations.
- A Park District employee, originally hired as an Area Manager, a Shakman-exempt position, had been performing the duties of a non-exempt position for years, even though that position was never posted as a vacancy, and the employee never applied for or was hired for the position, as required by multiple sections of the District

Employment Plan. To rectify the situation, the OIG recommended that the non-exempt position be posted as a vacancy and filled in accordance with the requirements of Section V of the current Employment Plan. Management provided an initial response to the OIG's report stating that it would act on the recommendation to post the non-exempt position as a vacancy and fill it in accordance with the requirements of Section V of the current Employment Plan. Management's formal response to the report is due October 29, 2025.

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

Sincerely,



Peter Neumer
Inspector General
Chicago Park District Office of Inspector General

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I. Overview of the Office of Inspector General

A. Mission of the Office of Inspector General

Pursuant to Chapter II(D) of the Chicago Park District Code, the Office of Inspector General (OIG) is authorized to:

- Investigate allegations of fraud, waste, and misconduct by Chicago Park District employees, Board members, contractors, agents, or volunteers.
- Monitor the Park District's compliance with the Employment Plan's rules governing hiring and other employment actions.
- Conduct audits to enhance the effectiveness and efficiency of the District, ensure compliance with legal requirements, policies, and best practices, and mitigate risks which could impair the mission of the District.

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

- 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)

B. Budget and Organization of the Office of Inspector General

For the 2025 fiscal year (FY25), the OIG's budget is \$1,148,162. At the end of the third quarter of FY25, the OIG was staffed as follows: an Inspector General, Deputy Inspector General, Director of Audit, one full-time Performance Analyst, two full-time Legal Investigators, one part-time Investigator, one Hiring Compliance Officer, one Administrative Secretary I, and one part-time Hiring Compliance contractor.

The OIG is in the process of hiring one full-time Performance Analyst. The OIG also receives regular support from law enforcement personnel.

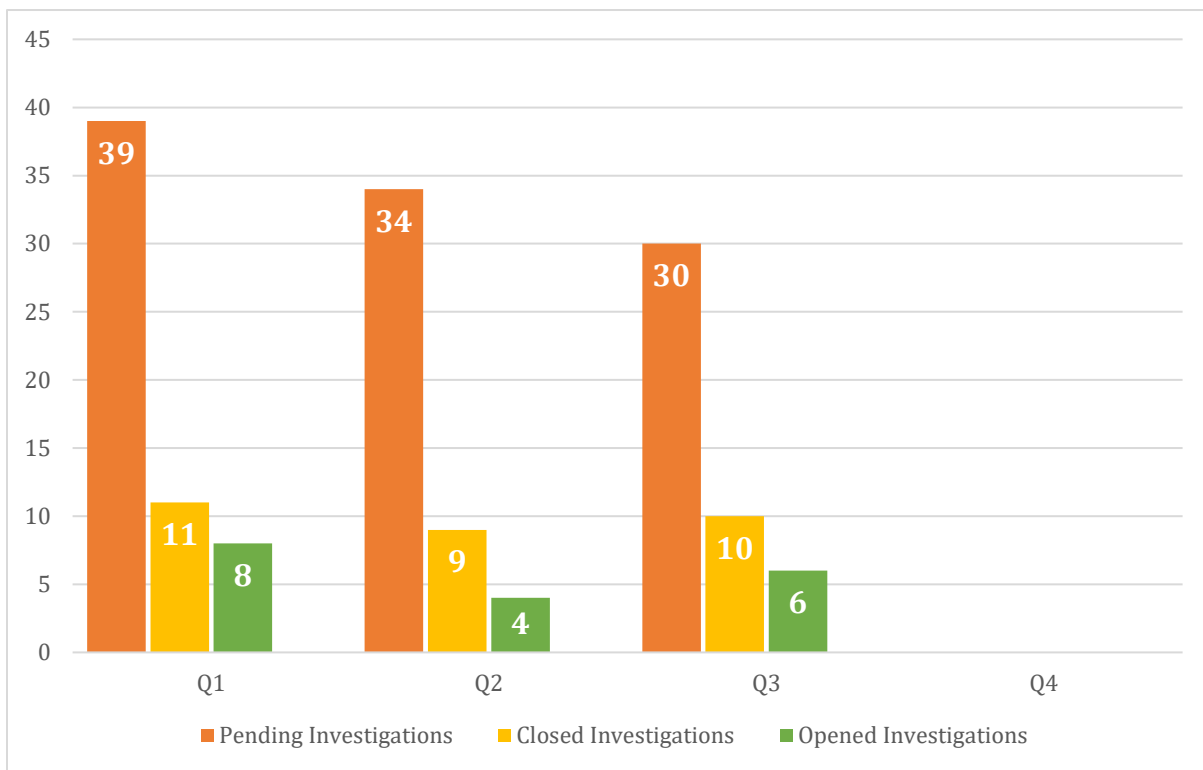
II. Summary of the OIG’s FY25 Third Quarter Investigative Activity

A. Overview of the OIG’s FY25 Q3 Investigative Activity

In the third quarter of FY25, the OIG:

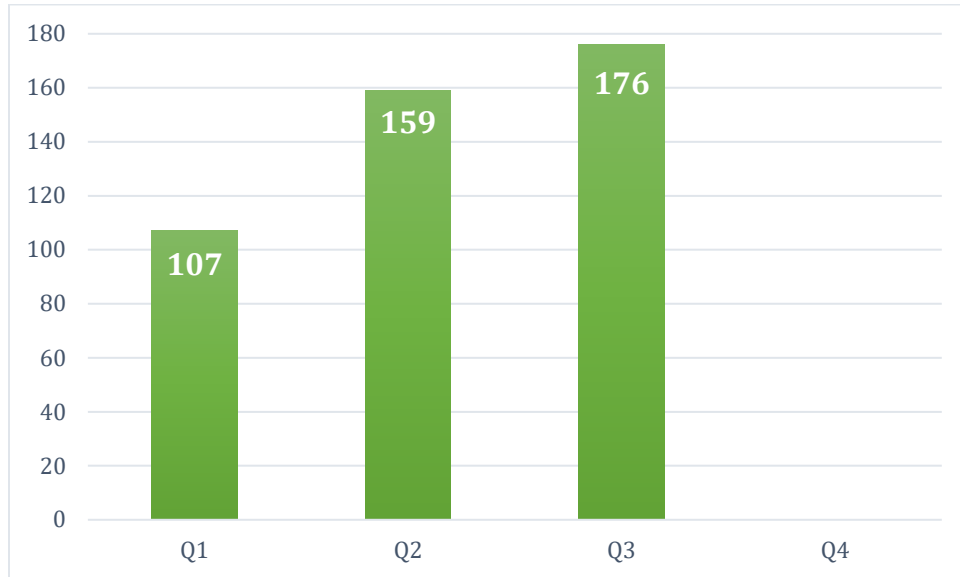
- Opened 6 investigations;
- Closed 10 investigations;
- Had 30 pending investigations at quarter’s end.

FIGURE 1: THE OIG’S FY25 INVESTIGATIVE ACTIVITY



The OIG received 176 complaints in the third quarter of FY25.

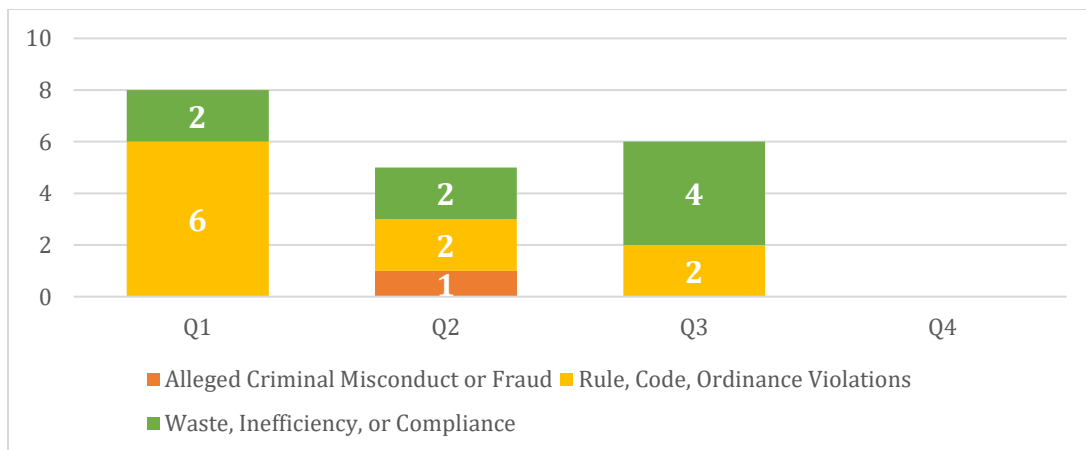
FIGURE 2: THE OIG’S FY25 COMPLAINT DATA¹



With respect to the 6 investigations the OIG opened in the third quarter of FY25:

- 0 of the investigations involved alleged criminal misconduct or fraud;
- 2 of the investigations involved other Rule, Code, or Ordinance violations; and
- 4 of the investigations involved waste, inefficiency, or compliance.

FIGURE 3: THE OIG’S FY25 INVESTIGATION TYPE DATA

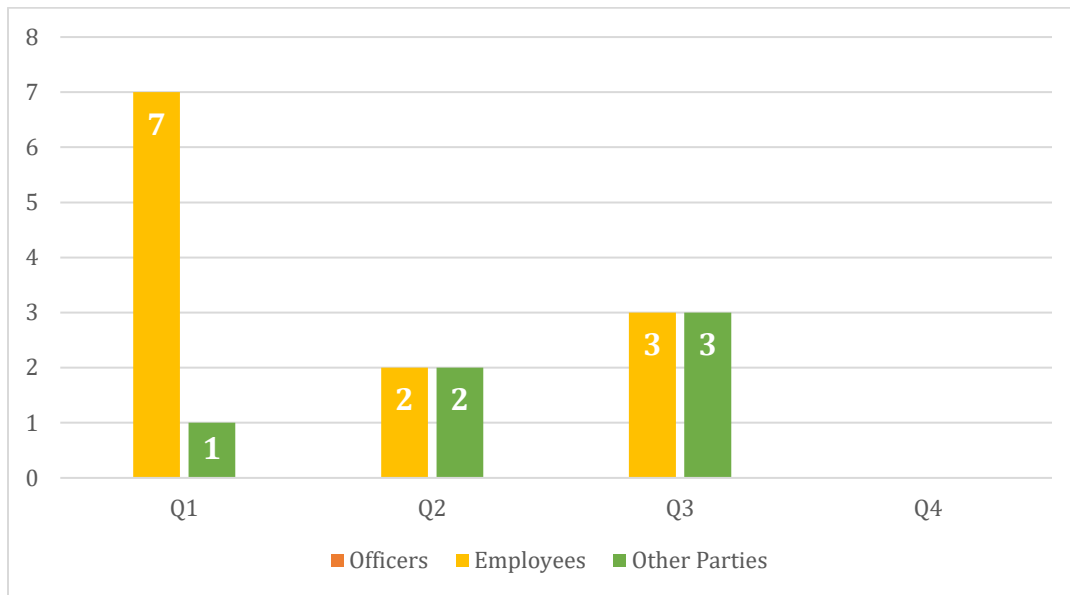


¹ Complaints received reflect the number of contacts received during the quarter and includes OIG-initiated complaints. Matters not within the scope of the OIG’s mission are referred to other Park District departments or to external agencies.

With respect to the 6 investigations the OIG opened in the third quarter of FY25:

- 3 of the investigations involved employees; and
- 3 of the investigations involved other parties.

FIGURE 4: THE OIG'S FY25 INVESTIGATIVE SUBJECTS DATA



B. Summaries of the OIG's FY25 Q3 Substantiated Investigations

In the third quarter of FY25, the OIG issued 2 investigative reports with substantiated findings. More specifically:

- In 23-0547, the OIG established that a Park District Activities Instructor fraudulently obtained a federal Paycheck Protection Program loan. Accordingly, the OIG recommended that the Park District discharge the Activities Instructor and place them on the Park District's ineligible for rehire list. Following the issuance of the OIG's report, the employee resigned and HR coded them as "Ineligible for Rehire - Resigned in Lieu of Termination." HR also stated that it included 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.
- In 24-0348, the OIG determined that a Park District Attendant violated the Park District Code of Conduct by (1) engaging in the theft of private property while wearing Park District attire and while Park District records reflect that he was on-duty, and (2) lying to the OIG about the theft during the Attendant's subsequent OIG interview. More specifically, the evidence established that the Attendant took a package from a private residence while wearing a Chicago Park District staff shirt.

The Attendant acknowledged taking the package but implausibly claimed that they did so to relocate the package to prevent its theft by others. However, when the OIG communicated with the resident whose package had been stolen, they informed the OIG that they were not able to recover the package. Accordingly, based on these findings, the OIG recommended that the Park District discharge the Attendant and place them on the Park District's ineligible for rehire list. Management's response to the OIG's report is due October 23, 2025.

C. The Park District's Response to a Previously Issued OIG Investigative Report

In the third quarter of FY25, the Park District responded to one investigative report that the OIG issued in the second quarter of FY25: 24-0140.

- In 24-0140, the OIG established that a Workforce Development employee violated the Park District's Employment Plan during a hiring sequence by failing to follow the procedures set forth in the Plan regarding the identification of a conflict of interest. The OIG investigation further established that the employee did not serve as an objective evaluator during the hiring sequence, but rather advanced the candidacy of their preferred candidate throughout the process, including by revising their initial interview ratings forms after the interviews had been completed, to increase their preferred candidate's score and reduce the scores of the majority of the other candidates. Based on its findings, the OIG recommended that the employee receive discipline commensurate with the misconduct detailed in the OIG's report, including, at a minimum, the receipt of additional training on the relevant provisions of the Employment Plan.

In response, HR stated that it found that the employee violated multiple sections of the District Code of Conduct, but that there were mitigating circumstances. Therefore, HR issued the employee a five-day unpaid suspension, which was served June 30, 2025 through July 4, 2025. In addition, the employee was assigned Employment Plan training which was completed on June 18, 2025. Finally, HR created and implemented a Performance Improvement Plan for the employee to define areas of concern and gaps in their work performance. An area of concern included "Ethics, Integrity, and Trust," which gave a directive to the employee to "disclose any actual or perceived conflicts of interest promptly" in the event they serve as an interviewer in a District hiring sequence.

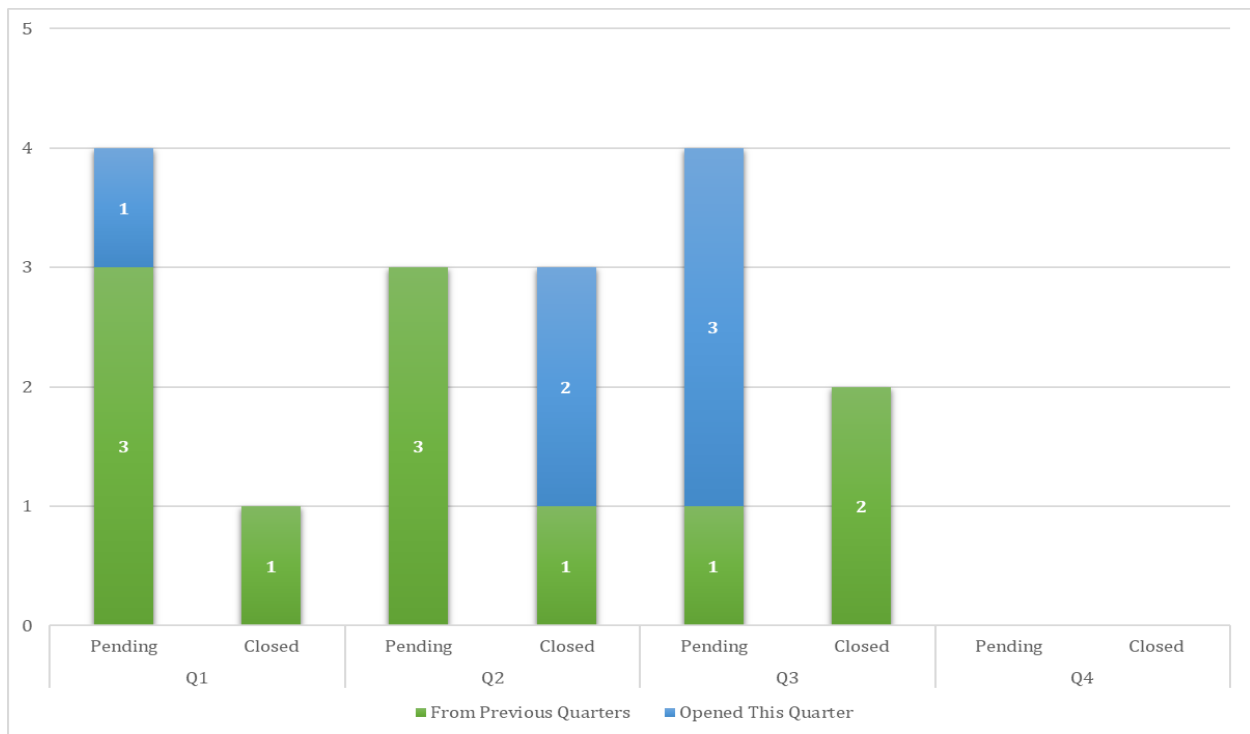
III. Summary of the OIG’s FY25 Third Quarter Audit Activity

A. Overview of the OIG’s FY25 Q3 Audit Activity

In the third quarter of FY25, the OIG’s Department of Audit:

- Opened three projects (25-0331 – a review of the District’s Ineligible for Rehire designation; 25-0420 – Program Evaluations; and 25-0428 – Pay Schedules).
- Closed two projects (24-0344 – “Revoking Separated Personnel’s Access to the Chicago Park District’s IT Systems;” 24-0431 – Vendor Pools; *see infra* Section B, below).
- Continued to conduct one project (25-0115 – Performance Evaluations).²

FIGURE 5: THE OIG’S FY25 AUDIT ACTIVITY³



² 25-0115 initially consisted of a review of the District’s performance evaluations and pay schedule processes, but due to evolving circumstances which impacted the scope of the project, the OIG separated performance evaluations and pay schedules into their own projects (25-0115 and 25-0428).

³ Note: This graph refers to the status of the OIG’s Department of Audit’s work at the end of each quarter.

B. Summary of Closed Projects

In the third quarter of FY25, the OIG closed two projects: 24-0344 – “Revoking Separated Personnel’s Access to the Chicago Park District’s IT Systems” and 24-0431 – “Vendor Pools.”

1. 24-0344 “Revoking Separated Personnel’s Access to the Chicago Park District’s IT Systems”

In September 2025, the OIG issued its report “Revoking Separated Personnel’s Access to the Chicago Park District’s IT Systems” (OIG report 24-0344). The purpose of this audit was to determine if the District timely and appropriately revokes access to the District’s IT applications when personnel separate, i.e., end employment. In this report, the OIG found that structural deficiencies in the District’s offboarding process risk unauthorized access to sensitive or confidential information by separated personnel. Specifically:

- The District has insufficient policies and procedures governing access revocation to IT applications for separated personnel during the offboarding process;
- The District cannot fully identify all of its personnel, specifically contractors, even though contractors can have access to IT applications;
- The District cannot fully identify all of its IT applications due, in part, to departments being able to independently procure their own applications;
- The District cannot establish which of its personnel has access to which IT applications;
- District IT applications may utilize different credentials; thus, the deactivation of one set of credentials does not revoke access to applications with other credentials;
- The District lacks a standard method for communicating personnel separations;
- Notification to two key departments charged with revoking access for separating personnel may occur anywhere from days to years after the separation, including those who are terminated or designated as ineligible for rehire;
- The District does not inform all relevant departments of personnel separating, specifically those who manage and grant access to certain IT applications;
- The District lacks procedures for identifying when contractors separate, i.e., when a contract expires, and subsequently revoking their access to IT applications;
- The District cannot fully confirm access revocation to IT applications occurs.

These structural deficiencies risk unauthorized access to sensitive or confidential information by separated personnel, including those who have been terminated or are designated as ineligible for rehire.

To address these issues, the OIG recommended the following:

1. The Department of Human Resources and the Department of Information Technology should develop written policies and procedures governing the offboarding process for separated personnel, including those who separate as a result of resignation, retirement, termination, reduction in the workforce, or expiration of a contract. These policies should have specific guidance for coordinating access revocation to the Chicago Park District's IT applications. The Departments should consult with additional departments, as necessary, when creating these policies.
2. The Chicago Park District should consider creating an inventory of all personnel, including contractors and all IT applications, and establish which personnel have access to which applications. If created, this inventory should be reviewed and updated appropriately to ensure timely and valid data.
3. The Chicago Park District should develop policies and implement procedures to ensure all Departments coordinate with the Department of Information Technology when procuring new IT applications.
4. The Chicago Park District should consider working with vendors to establish a single set of credentials across its IT applications, when feasible.
5. The Chicago Park District should implement a standard method for notifying the departments which manage and grant access to IT applications of when personnel, including contractors, separate. The District should further ensure that this method allows for immediate notification of a separation.
6. The Chicago Park District, including the Department of Information Technology, should development policies and implement procedures to ensure timely and appropriate access revocation to IT applications as well as for documenting and confirming this access revocation.

The Department of Human Resources and Department of Information Technology agreed or agreed in part with each of the OIG's recommendations. The Departments also provided a supplemental memo that sought to provide additional context and detailed its concerns about the OIG's risk assessments, including:

- The term "IT applications" is used in an "overly broad way that implies all systems pose equal risk;"
- The IT application ActiveNet is the only known example identified by the Departments as an application with elevated risks and the Departments have taken steps to mitigate these risks;
- Large employee groups such as lifeguards and attendants only have access to email counts and represent low-risk or informational access;
- All enterprise systems linked to the District's Active Directory are automatically cut off when an account is deactivated; which is centrally managed and tracked in the

Department of Information Technology’s ticketing system; the department-procured systems are higher risk, “where consistency is hard to enforce;”

- Once a District e-mail account is deactivated, access to shared mailboxes tied to that account is automatically revoked;
- The report does not distinguish between IT contractors and those “engaged by departments under separate agreements;”
- The report’s “emphasis on termination dates may give an inflated sense of risk.”

For the Department of Human Resources and the Department of Information Technology’s full response, please see the audit report on the OIG’s webpage.⁴

2. 24-0431 “Vendor Pools”

The OIG closed project 24-0431 (“Vendor Pools”) without issuing a report due, in part, to the resignation of the OIG’s performance analyst who served as the project lead since the project’s inception, which also resulted in the Department of Audit having limited resources. In addition, the OIG did not identify any known risks or material deficiencies during the fieldwork it conducted. The OIG will keep the topic of vendor pools in consideration for a future Department of Audit project.

⁴ Chicago Park District Office of Inspector General, “Revoking Separate Personnel’s Access to the Chicago Park District’s IT Systems,” September 30, 2025, accessed October 6, 2025, <https://www.chicagoparkdistrict.com/media/39301/download?inline>.

IV. Summary of the OIG's FY25 Third Quarter 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.

A. Summary of 25-0102

In the third quarter of FY25, the OIG issued one hiring compliance investigative report (25-0102). In 25-0102, the OIG conducted an investigation regarding a report that a Park District (District) employee was listed as an Area Manager, a Shakman-exempt position, in the District's payroll system, despite being budgeted as and performing the duties of a non-exempt position in the Office of Budget and Management. The OIG's investigation determined that, through no fault of the employee, the above-described report was generally accurate.

More specifically, the evidence reflects that the employee has been performing the duties of a non-exempt position for years, even though that position was never posted as a vacancy, and the employee never applied for or was hired for the position, as required by multiple sections of the District Employment Plan. Based on District records and interviews, it appears that over a ten-year period, the employee, only after being requested and authorized to do so by their supervisors, began performing work outside of their Area Manager title and then gradually increased that work until they were no longer performing any of the duties of an Area Manager. This shift culminated in 2023, when the employee began being budgeted as the non-exempt position, even though their official title remained Area Manager in the payroll system.

Because the above-described Employment Plan violations occurred incrementally over a 10-year period, and there were multiple employees responsible for these violations (none of which employees received the training mandated by the Employment Plan at the time of their actions because that training was not made available to District supervisors until 2025 and none of whom appeared to be deliberately attempting to place an unqualified or lesser-qualified candidate into the Senior Project Manager position), the OIG did not recommend discipline for any of the parties involved.

Rather, to rectify the situation, the OIG recommended that the non-exempt position be posted as a vacancy and filled in accordance with the requirements of Section V of the Employment Plan. The OIG further noted that the employee may apply for the position and be considered as part of the applicant pool. Finally, the OIG recommended that the number

of Area Manager titles on the Exempt list be reduced from 20 to 19, to reflect that the employee is not and has not been functioning as an Area Manager.

Management provided an initial response to the OIG's report stating that it would act on the recommendation to post the non-exempt position as a vacancy and fill it in accordance with the requirements of Section V of the current Employment Plan. Management's formal response to the report is due October 29, 2025.

B. Political Contacts Training for Legislative Affairs Staff

On July 30, 2025, the OIG provided an in-person training to the Park District's Legislative Affairs team regarding the Park District Employment Plan, and in particular, the definition of "Political Contact" and the requirement to report such political contacts. As background, the Employment Plan defines "Political Contact" as "[a]ny contact of any kind whatsoever (oral or written, direct or indirect) with any Public Official/Agent, or their staff, or any Political Organization regarding any Employment Action related to any Non-exempt Position," and it requires "[a]ny Employee who knows of or has a reasonable belief that a Political Contact or Unlawful Political Discrimination has occurred or is occurring, is required to report such information to the Compliance Monitor and the OIG directly and without delay." Any staff that were not able to attend the in-person training were provided access to the training online.

C. The OIG's FY25 Third Quarter Political Contact Reports

In the third quarter of FY25, the OIG issued five political contact reports (25-0036, 25-0215, 25-0217, 25-0304, 25-0315). As background, the Park District Employment Plan provides that the OIG in its role as Compliance Monitor is required to investigate all reported political contacts. If the OIG determines a political contact is lawful, the OIG must document the reasons for the determination and close the investigation. The Plan defines an "Unlawful Political Contact" as "[a]ny contact of any kind whatsoever (oral or written, direct or indirect) from any Public Official/Agent or Political Organization recommending an Employment Action related to a Non-exempt Employee that is based on Political Reasons or Factors." Employment Actions include hirings, transfers, demotions, promotions, terminations, among other actions. Non-exempt positions are filled in accordance with the processes set forth in Section V of the Plan, and the hiring decisions for non-exempt employees cannot be based on political reasons or factors. Exempt positions, which involve policy making or require confidentiality, can be filled based on political reasons or factors and are not subject to the processes of Section V.

In each of the five reports, the OIG determined that the political contact in question was lawful and was promptly reported by the District, as required by the Plan. More specifically:

- In 25-0036, a staffer for a City of Chicago Alderperson emailed the District to inquire about a non-exempt position that had been posted, and ask whether one of the applicants for the position, a former District employee, was on the District's Ineligible for Rehire list. The OIG determined that the communication did not constitute an unlawful political contact because the staffer did not recommend that any employment action be taken in regards to the former District employee. The OIG further determined that the District sent the email in question to the OIG shortly after receiving it, thus complying with the Employment Plan's requirement that such communications be promptly reported.
- In 25-0215, a staffer for a City of Chicago Alderperson emailed the District to inquire about the status of multiple family member's job applications for a non-exempt position. The OIG determined that the communication did not constitute an unlawful political contact because the staffer did not ask for or recommend that any employment action be taken in regards to their family member's job applications. The OIG further determined that the District sent the email in question to the OIG shortly after receiving it, thus complying with the Employment Plan's requirement that such communications be promptly reported.
- In 25-0217, the District received a communication from the City of Chicago Mayor's Office regarding a Park District youth job pilot program that an Alderperson had proposed. The OIG determined that the communication did not constitute an unlawful political contact because the Mayor's Office was inquiring about a program and not recommending an employment action for an individual based on political reasons or factors. The OIG further determined that the District reported the communication to the OIG shortly after it was made, thus complying with the Employment Plan's requirement that such communications be promptly reported.
- In 25-0304, an Alderperson emailed the District to inquire about the changed job assignment of a District employee and ask whether two vacant non-exempt positions could be filled in a park located in their ward. The OIG determined that the communication did not constitute an unlawful political contact because neither of the Alderperson's inquiries contained a recommendation for an employment action that involved political reasons or factors. The OIG further determined that the District sent the communication in question to the OIG shortly after receiving it, thus complying with the Employment Plan's requirement that such communications be promptly reported.
- In 25-0315, an Alderperson called the District to inquire about status of the transfer of a Park District employee, a constituent of the Alderperson. The OIG determined that the communication did not constitute an unlawful political contact because the Alderperson's inquiry did not contain a recommendation for an employment action that was based on political reasons or factors. The OIG further determined that the

District sent the communication in question to the OIG shortly after receiving it, thus complying with the Employment Plan's requirement that such communications be promptly reported.

D. The OIG's FY25 Third Quarter Hiring Sequence Audit Report

In the third quarter of FY25, the OIG issued one hiring sequence audit report (25-0440).

In 25-0440, the OIG conducted an audit of the hiring sequence for a Project Manager position. The OIG determined that the District generally complied with the requirements of the Employment Plan. However, the documentation for the sequence reflected that the District did not fully comply with Section V(K)(7) of the Employment Plan concerning interview ratings forms, as the interviewers did not correctly calculate the total interview ratings scores for two candidates. The documentation further reflected that the HR recruiter corrected one of the miscalculations in the final interview rating score list, but not the other. The OIG notes that neither of these miscalculations materially affected the hiring sequence, as the candidate with the highest interview scores was still selected for the position.

E. Senior Manager List Addition

The OIG is responsible for reviewing requests to add or remove positions from the Senior Manager List to determine if the position meets the requirements of Section VII of the Employment Plan. In the third quarter of FY25, the OIG issued one hiring compliance advisory report regarding a request to add a position to the Senior Manager list (25-0314).

In 25-0314, the District proposed adding a Special Projects Manager – Crisis Support position to the Senior Manager list. In its report, the OIG noted that the Special Projects Manager – Crisis Support position is an important position for the Park District with important job responsibilities. The OIG further noted that the Special Projects Manager – Crisis Support job description repeatedly references various project management responsibilities. In addition, Park District staff, during their communications with the OIG, further articulated certain of the project management responsibilities the position would be expected to carry out. However, the Employment Plan definition of "Senior Manager" is predicated on the understanding that such positions possess at least some internal supervisory functions. Most notably, the Employment Plan identifies one of the attributes of a Senior Manager as the responsibility to manage three or more subordinates. There was no dispute that at the present time the Special Projects Manager – Crisis Support position would not supervise any Park District employees.

In addition, another attribute of a Senior Manager identified in the Employment Plan—"the authority to initiate Employment Actions as to each subordinate"—takes as a given that the position possesses at least one subordinate. Here that was not the case.

The OIG also stated that the most recent organization chart reflects that the position does not report directly to the head of the department, but rather has two levels of supervision between them and the department head, which does not reflect "Senior" status. Accordingly, the OIG found that the position did not meet the criteria set forth in Section VIII of the Employment Plan for a Senior Manager position.

The OIG finally noted that the Employment Plan provides that the affected Department head can appeal the OIG's determination to the General Superintendent. The Plan further provides that the General Superintendent "may choose to grant the appeal or otherwise add the Position to the Senior Manager List [after] first consider[ing] in good faith the decision[] of . . . the Compliance Monitor." Employment Plan, Section VIII(A)(1)(b)."

In response to the OIG's report, the District stated in relevant part as follows:

I appreciate your office's diligent work in assessing whether the position meets the specific technical requirements outlined in Section VIII of the Employment Plan. Your analysis, grounded in the Plan's box-checking criteria, is clear and thorough. I have given your recommendation good faith consideration, as required under the Employment Plan. I understand that your office's assessment is rooted in the Plan's existing language, which defines "Senior Manager" status largely in terms of supervisory responsibility over three or more subordinates and direct authority to initiate employment actions. As you know, the Park District's Employment Plan was adopted to ensure fair, transparent, and politically neutral hiring processes, particularly in response to past practices of political patronage and improper influence in employment decisions. The Plan was a vital step in restoring public trust and ensuring merit-based employment practices. I affirm the importance of that mission and the safeguards it provides. However, the role at issue is fundamentally not about patronage. It is about people. The Special Projects Manager - Crisis Support is a position created to provide immediate and trauma-informed support to Park District employees affected by crises, including violence, loss, and other traumatic events. Our employees are frontline workers who serve children, families, and communities across Chicago, often under tremendous stress. The recent tragedy at Douglass Park, where former Park District lifeguard Charles Leto fatally shot 15-year-old

Marjay Dotson and critically injured 14-year-old Jeremy Herred, has only underscored the urgency of this work. In moments of crisis, staff need professional, compassionate, confidential and timely support. This position is designed to meet that need—not to circumvent process or policy.

While the position does not currently supervise staff, it requires advanced professional qualifications, independent judgment, sensitive communications with internal and external stakeholders, and discretion in navigating high-exposure incidents. It demands a level of responsibility, visibility, and leadership that clearly qualifies it as a senior-level role in practice—if not within the strict confines of the current Employment Plan. While the employment plan states that a senior manager is someone who has “significant managerial responsibilities such as management of three or more subordinates,” this “such as” language is inclusive of management of others, but it does not signal that the only way a position has managerial responsibilities is through overseeing other staff. Managerial responsibilities may also include managing an entire system of crisis support, managing outside partners, and managing the overall process, tracking, and implementation of crisis supports. This is a large job with highly confidential components. In addition, although the position does not currently have subordinates, this position and function is likely to grow to oversee other staff who would support crisis management. I recognize right now that we do not have the budget to build this out further, but it is something that is desperately needed for our staff. This is not a theoretical problem—it is a very real challenge affecting the wellbeing of our workforce. Our responsibility to our employees must guide us in moments like this.

Accordingly, pursuant to Section VIII(A)(1)(b) of the Employment Plan, I am overriding the OIG’s recommendation and formally designating the Special Projects Manager – Crisis Support position as a Senior Manager role. We will move swiftly to fill this position in the best interest of our workforce, our organization, and the residents we serve. Finally, I invite your office to work collaboratively with Park District leadership to assess whether and how the Employment Plan might be amended in the future to account for high-responsibility, high-discretion roles that may not fit neatly within its existing supervisory criteria. I value the safeguards your office upholds and believe this dialogue will help ensure both flexibility and integrity in our hiring framework.

F. 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 zero additions to the Exempt List in the third quarter of 2025. Additionally, there were zero removals to the Exempt List in the third quarter of 2025.

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

<https://www.chicagoparkdistrict.com/media/32751/download?inline>

G. 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 did not report any emergency appointments during the third quarter of 2025.

H. Review of Shakman-Exempt Management Hires

HR reported zero Shakman-exempt hires during the third quarter of 2025.

I. Monitoring Contacts by Hiring Departments

Pursuant to the Section XII(A)(1) of 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 did not report any improper contacts by hiring departments for the third quarter of 2025.

J. 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 third quarter of 2025 reflected 11 instances of employees “acting up” and 185 instances where an employee who had been in “acting up” status was placed back in their position.

K. 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. HR did (not) submit any “no consensus” letters during the third quarter of 2025.

L. 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 HR that two grievances were filed during the third quarter of 2025. The OIG reviewed those grievances but determined that neither involved Employment Plan-related issues. HR did not report any arbitrations during this quarter.

M. 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 third quarter of 2025, the OIG was consulted on four matters and rendered advisory opinions on issues that arose pertaining to implementation or interpretation of the Employment Plan.

V. 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 has 27 matters that have not been completed within 6 months (26 investigations and 1 audit). The following tables separate these matters into investigations and audits and provide the reasons for the continued pending status.

TABLE 1: THE OIG’S INVESTIGATIVE MATTERS PENDING OVER SIX MONTHS

Case Number	Nature of Allegation	Reason
23-0174	Criminal Conduct	Complex investigation – involves multiple allegations of theft.
23-0251	Residency	Resource intensive investigation.
23-0275	Residency	Resource intensive investigation.
23-0546	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0559	Hiring compliance	Complex investigation – multiple allegations.
24-0001	Time Falsification	Complex investigation – requires the analysis of significant records and documents and multiple interviews.
24-0066	Unauthorized Use of Park District Resources	Complex investigation – requires the analysis of significant records and documents and multiple interviews.
24-0079	Criminal Conduct	Complex investigation – requires the analysis of significant records and documents and multiple interviews.
24-0086	Time Falsification	Resource intensive investigation.
24-0132	Inappropriate use of Park District resources	Complex investigation – requires the analysis of significant records and documents
24-0148	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
24-0170	Contract Performance	Complex investigation – requires the analysis of significant records and documents.
24-0241	Failure to follow Park District reporting procedures	Complex investigation – multiple subjects.

24-0250	Time falsification and theft of Park District property	Complex investigation – multiple allegations.
24-0281	Irregularities related to required dog permits	Complex investigation – requires the acquisition and analysis of numerous documents and policies.
24-0288	Residency	Resource intensive investigation.
24-0289	Time falsification	Complex investigation - requires the acquisition and analysis of numerous documents and Park District policies.
24-0304	Hiring Compliance	Complex investigation – multiple subjects.
24-0326	Theft	Complex investigation – multiple subjects.
24-0360	Ethics violation	Complex investigation – requires the acquisition and analysis of numerous documents and Park District policies.
24-0399	Ethics Violation	Complex investigation – requires the acquisition and analysis of multiple contractual agreements and Park District policies.
24-0430	Policy Violation	Complex investigation – requires the acquisition and analysis of significant records and documents.
24-0437	Certification Testing Fraud	Complex investigation – multiple subjects.
24-0446	Hiring Compliance	Complex investigation – multiple subjects.
25-0024	Time Falsification	Resource intensive investigation.
25-0070	Residency	Resource intensive investigation.

TABLE 2: THE OIG’S AUDIT MATTERS PENDING OVER SIX MONTHS

Case Number	Nature of Audit	Reason
25-0115	Performance Evaluations	The District announced material changes in this area during the pendency of the audit that impacted the nature of the project, requiring the OIG to adapt and restructure its work.



The mission of the Office of Inspector General (OIG) is to:

- Investigate allegations of fraud, waste and abuse or misconduct by Chicago Park District employees, Board members, contractors, agents, or volunteers
- Monitor the Park District's compliance with the Employment Plan's rules governing hiring and other employment actions
- Conduct audits to enhance the effectiveness and efficiency of the District, ensure compliance with legal requirements, policies, and best practices, and mitigate risks which could impair the mission of the District.

It is the duty of every employee, Board member, agent, and contractor of the District to report any fraud, mismanagement, waste of funds or resources, abuse of authority, conflicts of interest, ethical violations or other improper act by another involving District business or assets. The Park District Code prohibits retaliation for reporting to, cooperating with, or assisting the Inspector General.

Submit a report to the Office of Inspector General through one of the following options:

- Online: <https://chicagoparkdistrict.i-sight.com/external/case/new>
- By telephone: (312) 742-3333 (Confidential Hotline)
- By fax: (312) 742-9505
- In writing: Chicago Park District Office of Inspector General, 740 N. Sedgwick St., Suite 300, Chicago, IL 60654
- In person: 740 N. Sedgwick St., Suite 300, Chicago, IL 60654