

CHICAGO PARK DISTRICT  
OFFICE OF INSPECTOR GENERAL

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An Overview of the  
Chicago Park  
District's Ineligible  
for Rehire  
Designation

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## Acronyms

CCC	City Colleges of Chicago	MWRD	Metropolitan Water Reclamation District
CPS	Chicago Public Schools	OEE	CPS's Office of Employee Engagement
DHR	City of Chicago Department of Human Resources	OIG	The Office of Inspector General
DNR	Do Not Rehire	OIIG	Cook County Office of the Independent Inspector General
HR	Human Resources	OPA	The Office of Prevention and Accountability
IFR	Ineligible for Rehire	SOP	Standard Operating Procedures

## **I. Executive Summary**

The Chicago Park District (District) designates former employees as Ineligible for Rehire (IFR) in order to identify individuals who are barred from re-employment, primarily due to misconduct. The Office of Inspector General (OIG) report on the District's IFR designation contains the following:

1. A historical overview of (a) the rules and policies that governed or govern the District's IFR designation from 2014 to present; and (b) the District's IFR-related processes;
2. A review of comparable IFR-related policies from other jurisdictions, including from the District's sister agencies, Chicago suburbs, and other cities throughout the nation.

As the District has either recently introduced, revised, or refined policies and procedures related to its IFR designation, it would not be appropriate at this time for the OIG to evaluate and provide recommendations regarding evolving processes which the OIG may evaluate in the future. Instead, this descriptive report is intended to provide clarity regarding the District's IFR designation and related processes, as well as be used as a resource for District employees and members of the public.

## II. Background

The Chicago Park District (District) designates former employees as Ineligible for Rehire (IFR) in order to identify individuals who are barred from re-employment, primarily due to misconduct. The District's IFR designation is a hiring standard for former District employees who may seek employment again in the future, including:

- *Full-Time Employees*  
Examples of full-time, i.e., monthly, employees include, but are not limited to, park supervisors, analysts, and legal staff;
- *Part-Time Employees*  
Examples of part-time, i.e., hourly, employees include, but are not limited to, instructors, facilitators, and lifeguards;<sup>1</sup>
- *Seasonal Employees*  
Examples of seasonal employees include, but are not limited to, camp counselors and recreation leaders for day camps.<sup>2</sup>

Under the District's current IFR Policy, all former employees, with the exception of seasonal employees who received a poor performance evaluation, are to receive one of the following designations pertaining to their potential future employment:

- *Eligible for Rehire*  
An employee is considered eligible for rehire immediately after separation if they voluntarily resign, retire, or "are otherwise not deemed ineligible after separation."
- *Ineligible for Rehire*  
The circumstances under which an employee can receive the IFR designation have evolved over time with changes in the District's guiding documents, as discussed below (*see infra* Section II.A). Generally, the IFR designation results from incidents involving misconduct; however, the designation itself is not a part of the District's disciplinary process and is, as noted above, only a determination regarding potential future employment, possibly as a subsequent action following a disciplinary outcome.
- *Resigned or Retired Under Inquiry Prior to Completion of an Investigation*  
An employee may receive this designation if they resign or otherwise leave employment while they are the subject of an active investigation but the investigation has not yet concluded or an investigative report has yet to be issued. At the conclusion of the investigation, the "Resigned or Retired" designation will be removed if the underlying allegations are unsubstantiated, changing the employee's designation to

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<sup>1</sup> The District also employs full-time instructors and lifeguards.

<sup>2</sup> The District's IFR Policy applies to all employees. Although the District also utilizes contractors who may perform a variety of duties, dependent on the need of the hiring department, contractors cannot receive the IFR designation. Rather, issues concerning poor contractor performance or contractor misconduct are handled through a separate process.

“Eligible for Rehire” or, if substantiated, the employee’s designation will be changed to “Ineligible for Rehire.”<sup>3</sup>

Although the District’s IFR designations are sometimes referred to as a “list,” such as the references in the 2014 and 2024 versions of the District’s “Employment Plan,” the designation is actually a selection made by the Department of Human Resources (HR Department) within an IT system; reports identifying all former employees with an IFR designation can subsequently be generated by exporting the designation data into a spreadsheet.

### **A. A History of the Chicago Park District’s Ineligible for Rehire Designation.**

It is unclear exactly when the District first began utilizing the IFR designation. Based on electronic records, the District designated employees as IFR, then known as “Do Not Rehire” (DNR), in an electronic format, specifically, beginning in 2001. In 2014, the District’s Employment Plan was implemented, which had multiple provisions detailing the circumstances under which a former employee should be designated as IFR. In 2025, the District established its “Ineligible for Rehire Policy” (Policy) and amended the Employment Plan to clarify that the IFR designation is governed by the Policy.

Aside from the Plan and Policy, the District has not historically, or currently, had any other guiding documents, such as standard operating procedures (SOP), outlining specific processes for determining and removing IFR designations. This lack of written policies inhibits, to a certain extent, the District’s ability to fully identify historical processes in this area.

The following describes both the IFR designation provisions in the Plans and the Policy, and how the District’s processes evolved with the new guiding documents.

#### **1. The Chicago Park District’s Employment Plan**

On December 3, 2014, the District’s Personnel Board approved the District’s “Employment Plan.”<sup>4</sup> The District amended the Plan in 2024; however, the section pertaining to the IFR designation remained unchanged between the two versions. The 2014 and 2024 versions of the Plan, among other topics, provided guidance for the IFR designation, stating that a former employee “shall be deemed ineligible for rehire by the District if the former employee’s termination from District employment results from one of the following three employment actions:

1. Termination Disciplinary (career service employees),
2. Discharge (non-career service employees), or

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<sup>3</sup> Chicago Park District, “Ineligible for Rehire Policy, January 23, 2025, accessed September 24, 2025, <https://files.chicagoparkdistrict.com/2025-05/Ineligible%20for%20Rehire%20Policy.pdf>.

<sup>4</sup> The District implemented the Plan in connection with the *Shakman* litigation. For more information, see: <https://www.chicagoparkdistrict.com/shakman-compliance>.

3. Resignation in lieu of Discharge (Employee resigns after having been served with charges or after having been otherwise informed by the District, in a formal disciplinary setting, that the Employee will be terminated).<sup>5</sup>

As noted above, the Plan referred to the designations as a “list,” which was to be maintained by the Director of Human Resources or their designee.<sup>6</sup> The Plan further stated, “[e]very Employee whose termination or discharge from District employment falls into one of the above three categories shall be deemed ineligible for rehire for at least one year from the date on which the Employee was deemed Ineligible for Rehire.”<sup>7</sup> The Plan also clarified that the ultimate length of time a former employee retains an IFR designation was determined by the underlying conduct that resulted in one of the three employment actions. Former employees could retain the designation “in perpetuity,” for one of the following violations:

- “Conviction of a criminal offense, adjudication of guilty, rendition of a civil judgment, or a sustained finding by the OIG in connection with obtaining, attempting to obtain or performing a governmental transaction or governmental contract;
- [V]iolating federal or state statutes; making false statements to a District official; violation of the terms of the Employment Plan or the District’s political discrimination, sexual harassment, discrimination, violence in the workplace or equal employment opportunity policies;
- [A]ny conduct by the Employee which results in a criminal conviction, an adjudication of guilty, a civil judgment in favor of a governmental body or a sustained finding by the OIG resulting in a recommendation of termination and concurrence of the department head with the recommendation.”<sup>8</sup>

Finally, the Plan noted that the District would “use its best efforts to obtain an agreement with its sister agencies and members of the City Council to acknowledge and abide by these criteria when considering former District Employees for employment with their organizations.”<sup>9</sup>

Under the Plan, the District did not have a formal process to notify former employees of their IFR designations. Additionally, the District did not have a formal appeal process. However, as discussed above, the Plan allowed the District to remove an IFR designation after “at least one year from the date on which the Employee was deemed Ineligible for Rehire.”<sup>10</sup> In these cases, such as when an employee with the designation reapplied for employment with the District, the HR Department did not go back into the IT system and remove the designation.

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<sup>5</sup> Chicago Park District, “Chicago Park District Employment Plan,” 2024, accessed September 25, 2025, <https://assets.chicagoparkdistrict.com/s3fs-public/documents/departments/human%20resources/2024/Employment%20Plan%20-Amended%202024-.pdf>.

<sup>6</sup> Chicago Park District, “Chicago Park District Employment Plan.”

<sup>7</sup> Chicago Park District, “Chicago Park District Employment Plan.”

<sup>8</sup> Chicago Park District, “Chicago Park District Employment Plan.”

<sup>9</sup> Chicago Park District, “Chicago Park District Employment Plan.”

<sup>10</sup> Chicago Park District, “Chicago Park District Employment Plan.”

For example, if a former employee with an IFR designation reapplied for employment and in the course of their candidacy, it was determined their IFR designation was no longer an impediment to their hiring, the former employee could be rehired and still retain an IFR designation.<sup>11</sup> The District did not document the factors or the rationale for its determination in these situations.

The Plan was amended again in 2025, guiding users to the new IFR Policy (*see infra* Section II.A.2, below) by stating:

The designation of former District Employees as Ineligible for Rehire shall be governed by the District's Ineligible for Rehire Policy. This policy shall be contained in the HR Policy and Procedures Manual and revisions to the Ineligible for Rehire Policy shall be made in accordance with Section IV(B) [of the Plan].<sup>12</sup>

## **2. The Chicago Park District's Ineligible for Rehire Policy**

In January 2025, the District implemented its "Ineligible for Rehire Policy," which updates several processes from the Plan.<sup>13</sup> The Policy applies to all full-time, part-time, and seasonal employees. Discussed in more detail below, these updates reflect three substantive changes from the Plan. The Policy:

1. Explicitly defines the conduct and situations which result in an IFR designation;
2. Introduces a process to notify a former employee of their IFR designation;
3. Introduces a process for former employees to appeal their IFR designation.

The Policy also provides more specific guidance regarding the District's IFR designation as a hiring standard. As mentioned above, pursuant to the Policy, all former employees, with the exception of seasonal employees who received a poor performance evaluation, receive one of the following designations:

- Eligible for Rehire;
- Ineligible for Rehire; or

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<sup>11</sup> The HR Department noted that due to a lack of formal notification process, most former employees were likely unaware of their IFR designation and would, in turn, not be aware in cases if the designation was removed.

<sup>12</sup> Section IV(B) of the Employment states, "HR will maintain a Policy and Procedures Manual. The policies and provisions within the Manual are to be consistent with the provisions of this Employment Plan. HR may revise and update the Manual as required, provided HR will not revise or update any policy or procedure within the Manual without first sending a copy of the proposed revision or update to the OIG for comment regarding whether the proposed revision or update is in compliance with the Employment Plan. If no comment or written objection is received from the OIG within 10 calendar days, HR will post the updated Manual on the District's website." Chicago Park District, "Chicago Park District Employment Plan."

<sup>13</sup> Prior to the finalization of the January 2025 "Ineligible for Rehire Policy," the OIG was sent a draft version of the Policy and provided feedback regarding that draft, including sending suggested edits to the District. The Inspector General also subsequently participated in briefings to the Board of Commissioners regarding the Policy.

- Resigned or Retired Under Inquiry Prior to Completion of an Investigation.<sup>14</sup>

The first substantive change the Policy introduced explicitly defines the conduct and situations which result in an IFR designation. Former employees can receive the IFR designation if they are terminated for one or more of the following reasons:

- Serious misconduct;<sup>15</sup>
- Conviction or adjudication of guilty of a criminal offense or a civil judgment in the course of duties as an employee in connection with improperly obtaining, attempting to obtain, or performing a governmental action;
- Violation of any statute referenced in the Chicago Park District Act, 70 ILCS 1505/16a-5;<sup>16</sup>
- Making false statements to a District official in the course of an investigation;
- Any conduct which results in a sustained finding by the Office of Inspector General (OIG) or the Office of Prevention and Accountability (OPA).

Employees may also receive a temporary IFR designation if they resign or retire and then become the subject of an investigation involving serious misconduct. According to the Policy:

A Former Employee who is the subject of an Investigation into Serious Misconduct that commences following their resignation or retirement will be temporarily designated as Ineligible for Rehire during the pendency of the Investigation. If the Investigation determines the allegations are unsubstantiated, the employee will be notified of the same, and the designation will be removed. If the Investigation substantiates the allegations, the Former Employee shall be designated as Ineligible for Rehire.<sup>17</sup>

The second substantive change the Policy introduced is the District's notification process to inform former employees of their IFR designation. When the HR Department designates a separated employee as "Ineligible for Rehire," the Department is to provide written notice of this designation to the former employee, as well as provide the employee their appeal rights. The notification is to be given either at the time of the employee's termination, at the time the employee resigns or retires in lieu of termination, or at the time an investigation

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<sup>14</sup> According to the Policy, the Director of Human Resources, with the approval of the General Superintendent and Chief Executive Officer, has the delegated discretion to determine these hiring standards. Chicago Park District, "Ineligible for Rehire Policy," January 23, 2025, accessed September 24, 2025, <https://files.chicagoparkdistrict.com/2025-05/Ineligible%20for%20Rehire%20Policy.pdf>.

<sup>15</sup> The IFR Policy defines "serious misconduct" as, "[c]onduct that is a violation of Group A actions as set forth in the Guidelines for Discipline established by the Personnel Board in the Employee Code of the Chicago Park District." Information on Group A can be found on page 14 of the District's "Guidelines for Discipline," <https://assets.chicagoparkdistrict.com/s3fs-public/documents/departments/human%20resources/2025/Code%20of%20Conduct%20with%20Discipline%20Guidelines.pdf>

<sup>16</sup> For more information, see:

<https://www.ilga.gov/Documents/legislation/ilcs/documents/007015050K16a-5.htm>.

<sup>17</sup> Chicago Park District, "Ineligible for Rehire Policy."

substantiates series misconduct.<sup>18</sup> Finally, the Director of Human Resources is to take “appropriate remedial action” to notify former employees if they discover that one or more of the notifications “is not given.”<sup>19</sup>

The final substantive change between the Plan and the Policy is the introduction of an appeals process. In order to appeal an IFR designation, the former employee must wait at least one year from the date the designation was made; however, they can request an appeal sooner if they believe the designation was “made in error.”<sup>20</sup> Additionally, the Director of the HR Department will only consider an appeal from a former employee once every 12 months. Appeals must be submitted in writing, either via e-mail or mail, and cannot be made in person or via a phone call. In addition to the former employee’s current mailing and e-mail addresses, an appeals petition must include all reasons and any supporting evidence as to why the designation is no longer valid or should be excused.

Once an appeal is received:

The Director of Human Resources shall give due consideration to any applicable collective bargaining agreement, any exigent circumstances, subsequent remediation, or subsequent evidence or circumstances that supports the removal of the Ineligible for Rehire designation. The Director of Human Resources shall also give due consideration to the reason for the termination, and the nature of the misconduct that gave rise to the termination.<sup>21</sup>

After the Director of Human Resources reviews the appeals petition, their decision, including their rationale, is to be issued via letter or e-mail. The Policy states, “[t]he Director of Human Resources’ decision whether to remove the designations is final and discretionary.”<sup>22</sup>

Regarding volunteer opportunities with the District, the Policy states, “[f]ormer employees who have an Ineligible for Rehire designation are not eligible to volunteer.”<sup>23</sup> However, the Policy also states:

In the event a Former Employee is only interested in volunteering for the Park District and is not challenging their Ineligible for Hire status for future employment purposes, the Former Employee may submit an Ineligible for Rehire removal petition limited to their volunteer status.<sup>24</sup>

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<sup>18</sup> Regarding this last situation, the Policy notes, “[e]xcept in cases that present legitimate privacy or safety concerns, a copy of any applicable investigatory report shall be included in the notice with appropriate redactions, if necessary.” Chicago Park District, “Ineligible for Rehire Policy.”

<sup>19</sup> Chicago Park District, “Ineligible for Rehire Policy.”

<sup>20</sup> Chicago Park District, “Ineligible for Rehire Policy.”

<sup>21</sup> Chicago Park District, “Ineligible for Rehire Policy.”

<sup>22</sup> Chicago Park District, “Ineligible for Rehire Policy.”

<sup>23</sup> Chicago Park District, “Ineligible for Rehire Policy.”

<sup>24</sup> Chicago Park District, “Ineligible for Rehire Policy.”

These petitions follow the same timing requirements as other petitions: the former employee seeking a volunteer opportunity must wait at least a year after the designation was made, unless they believe the designation was made in error, and the Director of Human Resources will only consider an appeal once every 12 months.

## **B. Additional Procedural Changes to the Chicago Park District's "Ineligible for Rehire" Designation**

Since implementing the Policy in January 2025, the District has continued to consider revisions and refinements to its processes related to IFR designations, specifically regarding the appeals process and designating hiring standards, including those of seasonal employees.

### **1. The Appeals Process**

Since introducing an appeal process in the 2025 Policy, the District has made changes to how appeals are reviewed. To help decentralize the appeals process, where previously only the Director of Human Resources determined an appeal's outcome, the District created an Appeals Committee to review appeals and make recommendations to the Director. The Appeals Committee is comprised of:

- The Director of Human Resources
- The Labor Relations Supervisor
- The Chief Operating Officer
- The Chief Program Officer
- The Chief of Staff.<sup>25</sup>

The Committee reviews any appeals received within 30 business days of receipt of the appeal, or as soon thereafter as is practical, and makes a decision on recommending an appeal to the Director of Human Resources by a majority (three of the five members) vote. The Director then reviews the Committee's recommendation and makes a determination to approve or deny the appeal. At the present time, the appeal processing changes as laid out above, have not been codified into the IFR Policy, or other guiding documents, such as a formal SOP.

### **2. Updated Designations and Seasonal Employees**

As discussed above, the 2025 Policy defines the conduct and situations which result in an IFR designation. The District has made efforts to review the IFR designations of its former employees who received the designation prior to the 2025 Policy to determine if they would still have the designation under the 2025 Policy. In some cases, this effort involves reviewing physical files located at an offsite storage facility and the District may be hindered by what has and what has not been included in these files. The HR Department stated it is proactively sending former employees the appeals form in instances where it is unclear if the employees

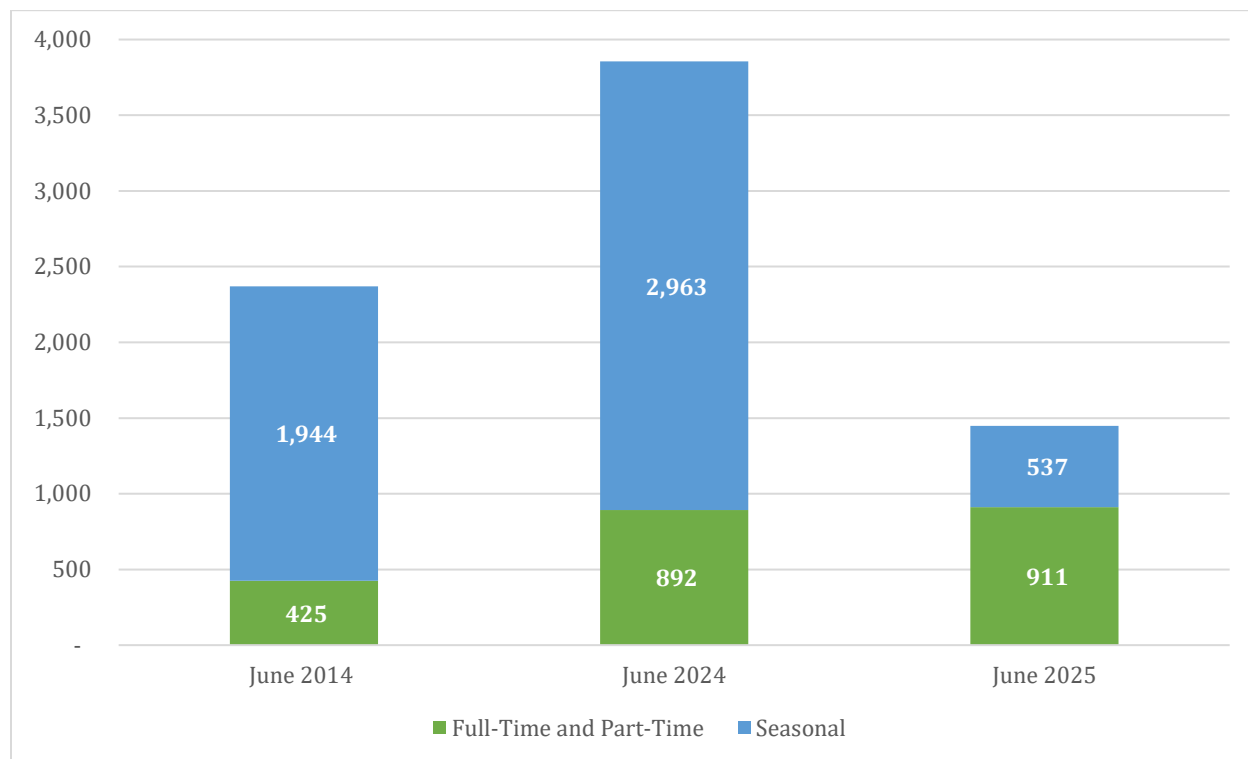
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<sup>25</sup> In an earlier iteration, the Committee was comprised of the Labor Relations Supervisor, the Chief Operating Officer, and the Chief Program Officer, or their respective designees. In both iterations, each Committee member must disclose any potential conflict of interest and, in the event that a Committee member has a conflict, the member shall not serve on the Committee when the Committee is reviewing the specific employee's case.

would have otherwise received the designation under the 2025 Policy. The District is prioritizing its review of historic IFR designations by reviewing the designations of former employees who have reapplied for employment or who are appealing their IFR designation.

The group most impacted by this effort are seasonal employees. Before the 2025 Policy, seasonal employees would receive the IFR designation if they received a poor performance evaluation, i.e., appraisal, at the end of the season, even if the evaluation did not indicate serious misconduct. When determining if former employees met the 2025 Policy's criteria for an IFR designation, the District removed the designations for seasonal employees who received the designation only as a result of a poor performance evaluation, e.g., poor attendance. However, the District maintained the designation for seasonal employees who otherwise would have received the designation under the 2025 Policy. The figure below presents the number of full-time and part-time employees with an IFR designation, compared to seasonal employees with the designation, across three points-in-time: June 2014, before the introduction of the Employment Plan; June 2024, six months before the 2025 Policy was implemented; and June 2025, six months after the 2025 Policy.

**FIGURE 1: TOTAL NUMBER OF FORMER EMPLOYEES WITH “INELIGIBLE FOR REHIRE” DESIGNATIONS JUNE 2014, JUNE 2024, JUNE 2025<sup>26</sup>**



Source: OIG analysis of the Chicago Park District Department of Human Resources’ “Ineligible for Rehire” data.<sup>27</sup>

While the number of full-time and part-time employees receiving the IFR designation grew slightly between June 2024 and June 2025 (2.1%), the number of seasonal employees with the designation decreased significantly over the same period (-81.9%). The decrease in seasonal employees with IFR designations from June 2024 to June 2025 is a direct result of the removal of the IFR designation from those with only poor appraisals. The HR Department stated it is in the process of changing its termination codes for employee separation within its Oracle Cloud system to be more aligned with the 2025 Policy. This endeavor may include

<sup>26</sup> It is possible the datasets include some duplicate employee entries. More specifically, some of the data fields are blank, e.g., “Employee Number,” and while there are indications that certain employees with the designation could be the same person, e.g., both entries list the same home address, the OIG cannot definitively state that these are the same person. Given the small number of observations with potential duplicate entries (June 2014: 2 potential employees, or 0.1%; June 2024: 31 potential employees, or 0.8%; June 2025: no potential employees, or 0.0%), this does not materially impact the conclusions presented here.

<sup>27</sup> The HR Department provided the OIG the data used for Figure 1 by compiling separation data from a District Oracle system. For each period in time, i.e., June 2014, June 2024, and June 2025, the HR Department filtered the data to identify terminations that would have resulted in an IFR designation during that respective time. For example, for the 2,369 identified employees with IFR designations as of June 2014, the HR Department first compiled a dataset of all employee separations and then filtered the employees based on which terminations would have resulted in an IFR designation based on the June 2014 criteria for assigning the designation. The HR Department repeated the process for June 2024 and June 2025.

creating a new designation for seasonal employees with poor performance evaluations which would not assign a permanent IFR designation nor have an appeals process.<sup>28</sup>

### C. A Review of Comparable Ineligible for Rehire Policies

The following provides a descriptive overview of comparative policies from the jurisdictions that responded to the OIG's request for their IFR or comparable policy.<sup>29</sup> Please see Appendix A for a table summarizing key information provided below.

#### 1. The City of Chicago

The City of Chicago's (City) "Ineligible for Rehire Policy," effective August 1, 2025, outlines the City's designation, notification, and designation removal processes, as well as a provision noting that the IFR Policy cannot be used "for abusive or otherwise retaliatory purposes against its employees."<sup>30</sup> The IFR designation, which the Policy states, "is a hiring standard and designation, not a disciplinary action," can be designated for one or more of the following reasons:

- Separation due to a violation of the City's Personnel Rules, the Chicago Police Department's Rules and Regulations, or "other departmental rules that govern conduct;"
- Resignation or retirement in lieu of discharge;

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<sup>28</sup> There are certain union-represented seasonal employees who have an appeals process available under their collective bargaining agreement. Section 14.10 of the "Agreement Between the Chicago Park District and Services Employees International Union Local 73" states: "[a]t the commencement of the third consecutive season, seasonal employees shall not be terminated or listed as 'do not rehire' without the termination being monitored by the Employee Relations Counsel or the Director of Human Resources or their designee. The District shall, upon written request of the Union, meet with the Union to discuss the re-hiring of the seasonal employee. During this meeting, the Union shall be afforded the opportunity to present evidence and arguments to support the re-hiring of the seasonal employee. The District shall not arbitrarily deny the Union's request to re-hire the seasonal employee." Service Employee International Union Local 73, "Agreement Between the Chicago Park District and Services Employees International Union 73," July 1, 2023, accessed October 31, 2025, [https://seiu73.org/wp-content/uploads/2020/11/Final-Executed-SEIU-Local-73-CBA-23-27\\_format-for-printing.pdf](https://seiu73.org/wp-content/uploads/2020/11/Final-Executed-SEIU-Local-73-CBA-23-27_format-for-printing.pdf).

<sup>29</sup> The OIG conducted outreach to major cities with park districts or comparable functions. The OIG selected suburban park districts based on open source searching that indicated the suburban district may have had a comparable IFR Policy. In addition to the jurisdictions presented here, the OIG contacted numerous other jurisdictions. The Skokie Park District, the Schaumburg Park District, the Village of Buffalo Grove, the Village of Oak Park, the State of Illinois, the New York City Department of Parks and Recreation, the City of Houston, TX, the City of Jacksonville, FL, the City of Phoenix, AZ, the City of Seattle, WA, and Washington, D.C. stated they do not have a formal IFR Policy. The City of San Diego, CA stated that although they do not have a formal policy, they utilize language in the City Charter, when necessary. The OIG reached out, but did not receive responses from, the following jurisdictions: the Chicago Housing Authority, the City of Evanston, IL, the Village of Glenview, IL, the City of Naperville, IL, The City of Naperville IL Park District, the Village of Orland Park, IL, the City of Atlanta, GA, the City of Los Angeles, CA, the City of Philadelphia, PA. The Chicago Transit Authority stated it could not provide any documents without a subpoena or a court order.

<sup>30</sup> According to the City's Department of Human Resources, the City implemented the Policy around 2011 and it has been updated over the intervening years. City of Chicago Department of Human Resources, "City of Chicago Ineligibility for Rehire Policy," August 1, 2025, accessed September 26, 2025, [https://www.chicago.gov/content/dam/city/depts/dhr/supp\\_info/POLICIES/IFR\\_Policy\\_08012025.pdf](https://www.chicago.gov/content/dam/city/depts/dhr/supp_info/POLICIES/IFR_Policy_08012025.pdf).

- Resignation or retirement under inquiry and the investigation ultimately substantiates serious misconduct;<sup>31</sup>
- "It is discovered that the former employee had engaged in serious misconduct... while still employed with the City."<sup>32</sup>

The process begins with the employee's department head submitting a memo to the Department of Human Resources' (DHR) Commissioner detailing which of the reasons, with substantiating evidence, an employee requires an IFR designation.<sup>33</sup> DHR only confirms the IFR designation as detailed in the memo and is not involved with determining or approving the IFR designation. Absent a successful appeal, as discussed below, the IFR designation is permanent. DHR will then "timely notify" the former employee of the designation "via a written notice mailed to the employee's home address on file."<sup>34</sup> DHR sends the notification at the time the IFR designation is made, based on when one of the four reasons, outlined above, occur.

Former City employees with IFR designations can "request to remove the IFR designation... any time after the designation is placed;" however, they must wait two years between appeals if the first one was unsuccessful.<sup>35</sup> These employees must submit their request, via mail or e-mail, and provide a written statement and supporting evidence which outline why the designation is "no longer valid or should be excused."<sup>36</sup> The DHR Commissioner reviews the requests on a case-by-case basis, and although they may consult with other City officials, the Commissioner's decision is "final and discretionary."<sup>37</sup>

## 2. Chicago Public Schools

The Chicago Public Schools' (CPS) IFR designation is a hiring standard established by the Board of Education.<sup>38</sup> CPS's "Chief Executive Officer's Guidelines for Designating Separated Employees as Ineligible for Rehire" (Guidelines), effective July 1, 2011, and amended several times thereafter, outline the circumstances in which an IFR designation is made:

- "Employees dismissed for cause, including non-union employees who fail to successfully complete a Performance Improvement Plan;
- Employees who voluntarily resign or retire while dismissal charges or actions are pending or in lieu of dismissal;
- Employees who separated from employment and an investigation ultimately substantiated serious misconduct by the employee;

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<sup>31</sup> The Policy provides guidance on when a designation of "Resigned or Retired Under Inquiry" is made and how it can be removed, e.g., an investigation either substantiates or does not substantiate serious misconduct.

<sup>32</sup> City of Chicago Department of Human Resources, "City of Chicago Ineligibility for Rehire Policy," August 1, 2025, accessed September 26, 2025, [https://www.chicago.gov/content/dam/city/depts/dhr/supp\\_info/POLICIES/IFR\\_Policy\\_08012025.pdf](https://www.chicago.gov/content/dam/city/depts/dhr/supp_info/POLICIES/IFR_Policy_08012025.pdf).

<sup>33</sup> City of Chicago Department of Human Resources, "City of Chicago Ineligibility for Rehire Policy."

<sup>34</sup> City of Chicago Department of Human Resources, "City of Chicago Ineligibility for Rehire Policy."

<sup>35</sup> City of Chicago Department of Human Resources, "City of Chicago Ineligibility for Rehire Policy."

<sup>36</sup> City of Chicago Department of Human Resources, "City of Chicago Ineligibility for Rehire Policy."

<sup>37</sup> City of Chicago Department of Human Resources, "City of Chicago Ineligibility for Rehire Policy."

<sup>38</sup> The Guidelines utilizes both the term "Ineligible for Rehire" and "Do not Rehire."

- Employees who separated from employment and failed to cooperate with an investigatory process.”<sup>39</sup>

Additionally, former employees may receive a temporary IFR designation if an investigation into serious misconduct commences following or is pending during their separation. CPS stated they utilize a committee where a majority vote determines if an IFR designation will be made.

When the employee is designated as IFR, the Office of Employee Engagement (OEE) sends written notification to either the employee's address on record or the employee's personal e-mail, if on record. If these notifications are not given, OEE “shall take appropriate remedial action by notifying the separated employees as soon as practical after the lack of notice is discovered.”<sup>40</sup>

Former CPS employees can request to remove their IFR designation. Like the City of Chicago, former CPS employees can request the removal any time after the designation has been placed; however, unlike the City, these appeals can be made every 12 months, in contrast to the City's two-year waiting period. Along with their petition, employees are to submit the reasons for the removal along with supporting evidence, their current mailing address, and e-mail address. CPS's Chief Executive Officer has the discretion to remove an IFR designation, and if removed, the decision is issued via letter or e-mail. CPS stated they meet weekly to review petitions and strive to respond to petitions within 15 business days.

The Guidelines note that former employees with IFR designations are also ineligible to volunteer with CPS or work as a vendor. However, the Guidelines also state that if a former employee is only interested in volunteering or working as a vendor and not “challenging [their IFR designation] for future employment purposes,” the employee can submit a petition to partially remove the designation.<sup>41</sup>

### **3. City Colleges of Chicago**

The City Colleges of Chicago (CCC) does not have a formal policy, but rather a set of guidelines, issued in May 2009, to inform its IFR designation.<sup>42</sup> The guidelines are marked as “confidential and not for distribution;” therefore the OIG will not disclose their contents. At a high level, the guidelines do specify under which circumstances the IFR designation is made and outline a process for making and removing the designation.

### **4. Metropolitan Water Reclamation District**

The Metropolitan Water Reclamation District (MWRD) implemented its “Ineligible for Rehire Policy” on February 27, 2024. MWRD is a civil service environment where employees

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<sup>39</sup> Chicago Public Schools, “Chief Executive Officer's Guidelines for Designating Separated Employees as Ineligible for Rehire,” May 21, 2021, accessed September 26, 2025, <https://www.cps.edu/globalassets/cps-pages/about-cps/policies/administrative-hearings/dnh-guidelines-052021.pdf>.

<sup>40</sup> Chicago Public Schools, “Chief Executive Officer's Guidelines for Designating Separated Employees as Ineligible for Rehire.”

<sup>41</sup> Chicago Public Schools, “Chief Executive Officer's Guidelines for Designating Separated Employees as Ineligible for Rehire.”

<sup>42</sup> CCC uses the term “Do Not Rehire.”

can only be discharged by the District's Civil Service Board.<sup>43</sup> Separated employees are to receive the IFR designation in the following circumstances:

- Termination or resignation while on probation related to disciplinary reasons or misconduct;
- Discharge by the Civil Service Board;
- Separation while termination charges are pending or while on a 30-day suspension pending discharge;
- Separation during or before an investigation and the investigation substantiates serious misconduct;
- Separation and the employee fails to cooperate with the investigative process.

MWRD stated the IFR designation is permanent. The Policy also requires Human Resources (HR) to "promptly notify employees in writing" of their IFR designation, states that HR shall maintain an IFR list, and provides that the District reserves the right to share the list with other agencies.<sup>44</sup> Additionally, MWRD stated that former employees are able to appeal their IFR designation up to 15 days from when the notification was postmarked; the Civil Service Board reviews any appeals.

## 5. Cook County Office of the President

Cook County's Office of the President has two guiding documents pertaining to IFR designations: the "Employment Plan" (Plan), effective March 19, 2012, most recently amended on August 22, 2025 and serves as the ultimate authority on IFR designations, and the "Ineligible for Rehire List" policy (Policy), effective September 30, 2014.<sup>45</sup> The Plan states a former County employee or applicant is considered "ineligible for employment" for five years if the individual was terminated, resigned or retired in lieu of termination, or "deemed ineligible from consideration for employment" for the following circumstances:

- Violation of specific County Personnel Rules;
- A sustained finding by the Office of the Independent Inspector General (OIIG) involving engagement in unlawful political discrimination, prohibited political activity, intentionally providing materially false information to the OIIG or Compliance Officer, obstruction or refusal to cooperate with an investigation, or falsification of a County document concerning any County Employment Action.<sup>46</sup>

If an individual receives an IFR designation for reasons other than the ones enumerated above, they are to be placed on the County's IFR list for at least two years. These individuals are to be given notice that they are to be added to the IFR List, a copy of the applicable Personnel Rules or applicable grounds, and an opportunity to respond within 14 days of the

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<sup>43</sup> For more information, see: <https://mwrdd.org/what-we-do/management-and-administration/civil-service-board>.

<sup>44</sup> MWRD's IFR list is a spreadsheet that can be shared with managers.

<sup>45</sup> The Plan uses the term "Ineligible for Hire." Additionally, the Plan is only for the County departments which fall under the Office of the President and not departments which fall under other elected County officials.

<sup>46</sup> Cook County, "Employment Plan," August 22, 2025, accessed September 26, 2025, <https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/documents/2025-07/Cook%20County%20Employment%20Plan%20%28Effective%2006.01.2025%29%20FINAL.pdf>.

designation if they believe the designation was made in error. Additionally, the County is to notify the Compliance Officer and the OIIG at least five business days before an individual's name is added or removed and then provide updated copies of the list within 10 days of any change. Finally, the County's Bureau of Human Resources is to maintain the IFR list and check "during the employment validation process."

## **6. Village of Wilmette, IL**

While the Village of Wilmette, IL does not have a formal IFR policy, the following clause is added when an employee is separated pursuant to a separation agreement:

The Separation Date is Employee's last day of employment with Employer. Employee understands and agrees that he is not eligible for employment, reinstatement or reemployment with Employer, and agrees that he will not seek employment, reinstatement or reemployment with Employer on any basis at any time after his Separation Date. Employee further understands that he is not eligible for contractual work from Employer, and agrees that he will not seek any work from Employer as an independent contractor, or on any other contractual basis, at any time after his Separation Date. Employee agrees that if he violates any provision of this Paragraph "2," Employer will have the unfettered right to reject Employee's application for employment, reinstatement, reemployment or contractual work immediately and summarily.

## **7. City of Portland, OR**

The City of Portland's "Employees Restricted from Returning to Employment with the City of Portland" Administrative Procedure (Procedure) outlines the City's IFR designation processes.<sup>47</sup> The Procedure states that an IFR designation is appropriate in response to the following scenarios:

- "An employee was separated from service as a part of a targeted severance agreement that contains language restricting their reemployment;
- An employee was separated from service as a part of some other settlement agreement (including receiving a voluntary retirement incentive) that contains language restricting their reemployment;
- An employee was terminated with cause for an offense that may have included (but not limited to) violence in the workplace, sexual harassment, discrimination, retaliation, violation of workplace safety protocols, engaging in conduct unbecoming a City employee, or theft;
- An employee was given a proposed termination letter that cited charges that may have included (but not limited to) violence in the workplace, sexual harassment, discrimination, retaliation, violation of workplace safety protocols, engaging in

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<sup>47</sup> The City of Portland utilizes the term "restricted return codes."

conduct unbecoming a City employee or theft, but resigned in lieu of being discharged.”<sup>48</sup>

The Bureau of Human Resources will first determine if a separation qualifies as a “valid reason” for the IFR designation and, if the separation does qualify, the hiring bureau is to provide documentation which supports the designation, including the length of the designation, and any legal documents.<sup>49</sup> The City conducts bi-weekly audits to identify:

- Receipt of supporting documentation authorizing the IFR designation, or
- IFR designations which have reached their end date and “need to be delimited with a new separation action.”<sup>50</sup>

Finally, the Procedure notes that, unless stipulated in a separation agreement, any former employee can apply for a City position. When proceeding through the hiring process and it is discovered that the candidate is restricted from returning to the city, the hiring bureau is to consult with their HR Business Partner to determine next steps, e.g., when considering to interview an applicant, the City should determine if the applicant has an IFR designation.

## **8. The City and County of Denver, CO**

The City and County of Denver, CO, including its Denver Parks and Recreation System (DPR), follow its “Career Service Rules” (Rules) regarding IFR designations. According to Denver’s Office of Human Resources (OHR), the IFR designation is primarily determined through the discipline process and is applied when advised by the City Attorney’s Office. The Rules state that, “[d]ismissed employees are not eligible for future employment in the Career Service for a minimum of five years following such dismissal.”<sup>51</sup> The OHR Executive Director is to establish procedures governing how the former employees “may be placed on eligible lists after the five years have elapsed.”<sup>52</sup>

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<sup>48</sup> City of Portland Bureau of Human Resources, “Employee’s Restricted from Returning to Employment with the City of Portland.”

<sup>49</sup> City of Portland Bureau of Human Resources, “Employee’s Restricted from Returning to Employment with the City of Portland.”

<sup>50</sup> City of Portland Bureau of Human Resources, “Employee’s Restricted from Returning to Employment with the City of Portland.”

<sup>51</sup> City and County of Denver, “Career Service Rules, Rule 16 Code of Conduct and Discipline” February 12, 2016, accessed September 26, 2025, <https://www.denvergov.org/files/assets/public/v/2/human-resource-center/documents/careerservicerules/rule16.pdf>.

<sup>52</sup> City and County of Denver, “Career Service Rules, Rule 16 Code of Conduct and Discipline.”

### **III. Objectives, Scope, and Methodology**

#### **A. Objective**

The objectives of this project were to:

1. Describe the history of the District's IFR designation and changes in relevant policies and procedures, including the various versions of the District's "Employment Plan," and the District's "Ineligible for Rehire Policy," effective January 23, 2025.
2. To describe the District's reported ongoing processes for ensuring compliance with the District's "Ineligible for Rehire Policy."
3. To describe sister agencies and other peer jurisdictions' respective policies and procedures for IFR designations.

#### **B. Scope**

The scope of this review included descriptions of historical and current policies and procedures regarding the district's IFR designations, relevant District departments, and spans the time period from the date of the creation of the IFR designation through the present.

#### **C. Methodology**

The OIG utilized the following methodology to conduct this review:

- Reviewed all relevant current and historical policies guiding the IFR designation.
- Interviewed Department of Human Resources staff and other relevant District personnel to understand the historical and current processes related to the IFR designations, including any contemplated future changes which are intended to help the District comply with the "Ineligible for Rehire Policy."
- Requested and reviewed relevant sister agencies', suburban jurisdictions', and other major cities' policies related to the utilization and maintenance of an IFR designation. To identify suburban park districts, the OIG conducted an open-source search, assessing for indicators that the suburban agency may have a comparable IFR policy. To identify which external cities to reach out to, the OIG reviewed all major cities and cities with similar park districts or comparable functions.
- Interviewed members of sister agencies and peer jurisdictions to further understand the application of their IFR designation and how they ensure the accuracy of those designations.

## D. Standards

The OIG conducts performance audits with guidance from the United States Government Accountability Office's Generally Accepted Government Auditing Standards (GAGAS or "Yellow Book," 2024 revision). Pursuant to the Yellow Book:

Performance audits provide objective analysis, findings, and conclusions to assist management and those charged with governance and oversight with, among other things, improving program performance and operations, reducing costs, facilitating decision making by parties responsible for overseeing or initiating corrective action, and contributing to public accountability.<sup>53</sup>

For other categories of work-product, such as advisories, explainers, notifications, and program descriptions, the Department follows the guidance set forth by the Association of Inspectors General in *Principles and Standards for Offices of Inspector General* ("Green Book," 2024 revision).<sup>54</sup>

## E. Authority

The authority to perform this audit is established in Chapter II(D)(4) of the Chicago Park District Code, which states that the OIG has the power and duty to promote economy, efficiency, effectiveness and integrity in the administrations of programs and operations of the District by reviewing programs, identifying any inefficiencies, waste and potential for misconduct therein, and recommending policies and methods for the elimination of inefficiencies and waste, and for the prevention of misconduct.

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<sup>53</sup> United States Government Accountability Office, "Government Auditing Standards 2024 Revisions," February 2024, accessed October 14, 2025, <https://www.gao.gov/assets/d24106786.pdf>.

<sup>54</sup> Association of Inspectors General, "Principles and Standards for Offices of Inspector General," July 1, 2024, accessed October 14, 2025, <https://inspectorsgeneral.org/blog/newly-revised-aig-green-book-principles-and-standards-for-offices-of-inspector-general-is-now-available-for-download/>.

## Appendix A: An Overview of Ineligible for Rehire Policies

	Chicago Park District	City of Chicago	Chicago Public Schools	City Colleges of Chicago
<b>Permanent Designation:</b>	Yes	Yes	Yes	Yes
<b>Conduct that would result in a separated employee being designated "Ineligible for Rehire"</b>	1. Serious Misconduct; 2. Conviction or adjudication of guilty of a criminal offense or civil judgement in the course of duties as an employee in connect with improperly obtaining, attempting to obtain, or performing a governmental action; 3. Violation of any statute referenced in the Chicago Park District Act, 70 ILCS 1505/16a-5; 4. Making false statements to a District official in the course of an investigation; 5. Any conduct which results in a sustained finding by the OIG or OPA.	1. Separation due to violation of City's personnel rules or other departmental rules that govern conduct; 2. Resignation/Retirement in lieu of discharge; 3. Resignation/Retirement under inquiry and the investigation ultimately substantiates serious misconduct; 4. Discovery that a former employee engaged in serious misconduct while still employed with the City.	1. Employees dismissed for cause; 2. Employees who voluntarily resign/retire while dismissal charges or actions are pending; 3. Employees who voluntarily resign or retire in lieu of dismissal; 4. Employees who separated from employment and an investigation ultimately substantiated serious misconduct by the employee; 5. Employee who separated from employment and fails to cooperate with an investigatory process.	Confidential
<b>Notification Process</b>				
<b>Notifies former employees?</b>	Yes	Yes	Yes	Confidential
<b>Notification Method:</b>	Written	Written	Written	Confidential
<b>Appeal Process</b>				
<b>Has appeals process?</b>	Yes	Yes	Yes	Confidential
<b>Appeal Timeline:</b>	Must wait one year from receiving the IFR designation, unless they believe the designation was made in error. District will only consider an appeal once every 12 months.	Can appeal at anytime after receiving the IFR designation. Must wait two years between appeals if the first one is unsuccessful.	Can appeal at anytime after receiving the IFR designation. Must wait one year between appeals if the first one is unsuccessful.	Confidential
<b>Appeal Submission:</b>	Appeals must be submitted in writing, e-mail or mail.	Appeal must be submitted in writing.	Appeal must be submitted in writing.	Confidential
<b>Appeal Review and Determination:</b>	The appeals committee reviews all appeals and makes recommendations to the Director of Human Resources. The Director then reviews the recommendation; the Director's decision is final and discretionary.	Appeals are reviewed on a case-by-case basis by the DHR Commissioner. The Commission's decision is final and discretionary.	CPS reviews petitions weekly. CPS's Chief Executive Office has the discretion to remove an IFR designation.	Confidential

Chicago Park District Office of Inspector General  
 An Overview of the Chicago Park District's Ineligible for Rehire Designation

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	Metro. Water Reclamation District	Cook County	Wilmette, IL	Portland, OR	Denver City and County
<b>Permanent Designation:</b>	Yes	No	Unknown	Unknown	No
<b>Conduct that would result in a separated employee being designated "Ineligible for Rehire"</b>	1. Termination or Resignation while on probation related to disciplinary reasons or misconduct; 2. Discharge by the Civil Service Board; 3. Separation while termination charges are pending or while on a 30-day suspension pending discharge; 4. Separation during or before an investigation and the investigation substantiates serious misconduct; 5. Separation and the employee fails to cooperate with the investigative process.	1. Violation of specific County Personnel Rules; 2. A Sustained finding by the OIIG involving engagement in unlawful political discrimination, prohibited political activity, intentionally providing materially false information to the OIIG or Compliance Officer, obstruction or refusal to cooperate with an investigation, or falsification of a County document concerning any County Employment Action.	Employee is separated pursuant to a separation agreement.	1. An employee was separated as part of a targeted severance agreement that included language restricting reemployment; 2. An employee was separated as part of some other settlement agreement that included language restricting reemployment; 3. An employee was terminated with cause for an offense that may have included (but not limited to) violence in the workplace, sexual harassment, discrimination, retaliation, violation of workplace safety protocols, engaging in conduct unbecoming a City employee, or theft; 4. An employee was given a proposed termination letter that cited charges listed in #3, but resigned in lieu of being discharged.	Primarily determined through the discipline process with an advisory from the city Attorney's Office.
<b>Notification Process</b>					
<b>Notifies former employees?</b>	Yes	Yes	Unknown	Unknown	Unknown
<b>Notification Method:</b>	Written	Written	Unknown	Unknown	Unknown
<b>Appeal Process</b>					
<b>Has appeals process?</b>	Yes	Yes	Unknown	Unknown	Unknown
<b>Appeal Timeline:</b>	Must appeal within 15 days from when the notification is postmarked.	Must appeal within 14 days if they believe the designation was made in error.	Unknown	Unknown	Unknown
<b>Appeal Submission:</b>	Unknown	Unknown	Unknown	Unknown	Unknown
<b>Appeal Review and Determination:</b>	The Civil Service Board reviews any appeals.	Unknown	Unknown	Unknown	Unknown



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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.

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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