

# Office of the Inspector General City Colleges of Chicago

---

---

## Office of the Inspector General Bi-Annual Report January 1, 2019 – June 30, 2019

Prepared pursuant to Article II, Section 2.7.5 of the Board Bylaws

---

---

John A. Gasiorowski  
Inspector General

Office of the Inspector General  
City Colleges of Chicago  
740 North Sedgwick Street  
Suite 310  
Chicago, Illinois 60654  
Phone: (312) 553-3400  
Hotline: (312) 553-3399

E-Mail: [InspectorGeneral@ccc.edu](mailto:InspectorGeneral@ccc.edu)

Web: <http://ccc.edu/departments/Pages/Inspector-General.aspx>



To: Juan Salgado, Chancellor  
Dr. Walter E. Massey, Chair of the Board of Trustees  
Elizabeth Swanson, Vice-Chairperson of the Board of Trustees  
Clarisol Duque, Secretary of the Board of Trustees  
Peggy A. Davis, Trustee  
Karen Kent, Trustee  
Deborah H. Telman, Trustee  
Darrell A. Williams, Trustee  
Armani Alexander, Student Trustee

From: John A. Gasiorowski, Inspector General

Date: August 12, 2019

RE: Office of the Inspector General *Bi-Annual Report* for the period of January 1, 2019 through June 30, 2019

This *Bi-Annual Report* is being provided to the Chancellor and the Board of Trustees of Community College District No. 508 pursuant to Article 2.7.5 of the Board Bylaws. This *Bi-Annual Report* covers the period of January 1, 2019 through June 30, 2019. Pursuant to Article 2.7.5, the *Bi-Annual Report* for the period of January 1st through June 30th is required no later than September 1st each year.

Article 2.7 et seq. of the Board Bylaws authorizes the OIG for the City Colleges of Chicago to conduct investigations regarding waste, fraud and misconduct by any officer, employee, or member of the Board; any contractor, subcontractor, consultant or agent providing or seeking to provide goods or services to the City Colleges of Chicago; and any program administered or funded by the District or Colleges.

The OIG would like to thank the Chancellor, the Board of Trustees and the administration of the City Colleges of Chicago for their cooperation and support.

## Office of the Inspector General Bi-Annual Report

### Mission of the Office of the Inspector General

The Office of the Inspector General (“OIG”) of the City Colleges of Chicago (“CCC”) will help fuel CCC’s drive towards increased student success by promoting economy, efficiency, effectiveness and integrity in the administration of the programs and operations of CCC by conducting fair, independent, accurate, and thorough investigations into allegations of waste, fraud and misconduct, as well as by reviewing CCC programs and operations and recommending policies and methods for the elimination of inefficiencies and waste and for the prevention of misconduct.

The OIG should be considered a success when students, faculty, staff, administrators and the public:

- perceive the OIG as a place where they can submit their complaints/concerns in a confidential and independent setting;
- trust that a fair, independent, accurate, and thorough investigation will be conducted and that the findings and recommendations made by the OIG are objective and consistent; and
- expect that the OIG’s findings will be carefully considered by CCC administration and that the OIG’s recommendations will be implemented when objectively appropriate.

### New Developments

#### Promotions/Staff Changes

Effective February 7, 2019, the OIG promoted two staff members. Matthew Bonini, an OIG employee since January 2015, was promoted from his Investigator II position to Investigator III. Luis Guzman, an OIG employee since November 6, 2017, was promoted from his initial position of Investigator I to Investigator II.

Additionally, effective March 25, 2019, the OIG hired Brenda Pruitt to fill an open position. Brenda serves as an Investigator I.

### Updates to Investigations Documented in Previous Bi-Annual Reports

#### Updates regarding disciplinary recommendations made during the July 1, 2018 to December 31, 2018 reporting period

In the *Bi-Annual Report* submitted for the July 1, 2018 to December 31, 2018

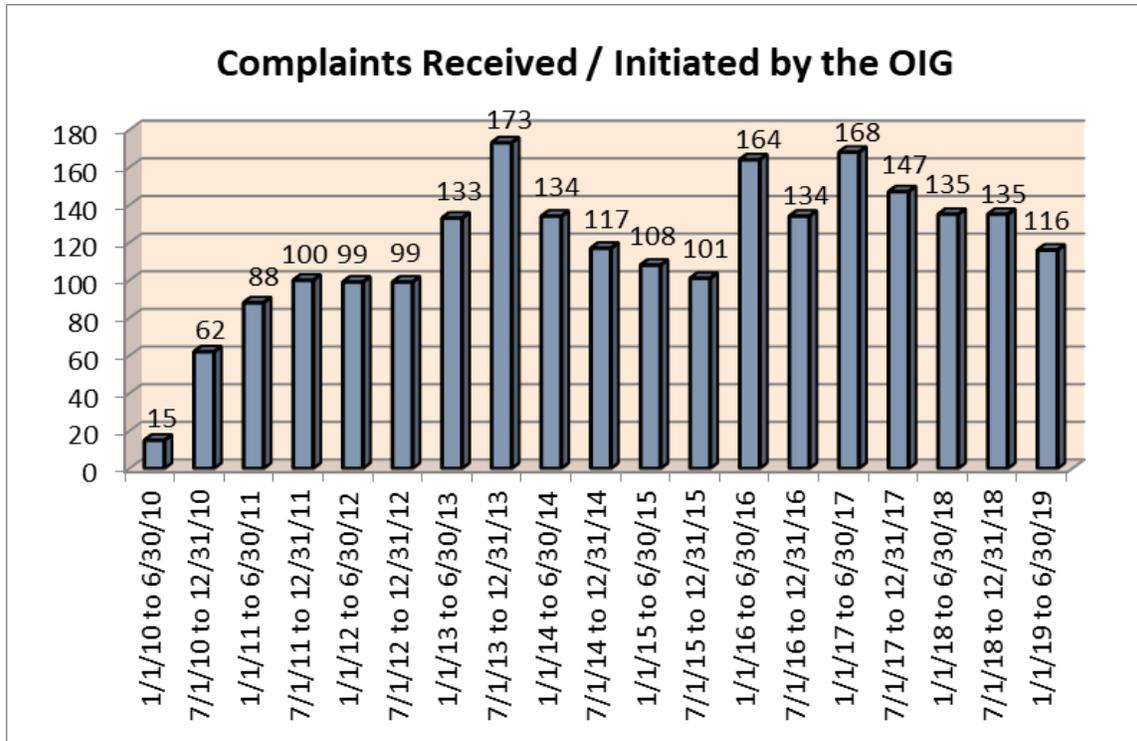
reporting period, the OIG documented sixteen reports regarding eighteen investigations which resulted in sustained findings of waste, fraud and misconduct. At the time the *Bi-Annual Report* was submitted, disciplinary action was pending regarding several of the investigations. The following table updates the disciplinary actions recommended by the OIG as well as the actions taken by CCC regarding employee misconduct documented in the *Bi-Annual Report* submitted for the July 1, 2018 to December 31, 2018 reporting period.

<b>Disciplinary Action Updates from Investigations Reported on in Previous Bi-Annual Report (July 1, 2018 to December 31, 2018)</b>			
<b>Case Number</b>	<b>Title</b>	<b>Recommendation</b>	<b>Final Disciplinary Action</b>
18-0171	College Financial Aid Advisor I	Termination / DNRH <sup>1</sup>	Resignation / DNRH
18-0171	College Administrative Assistant I	Termination / DNRH	Resignation / DNRH
18-0172 / 18-0192	College Advisor	DNRH (following resignation)	
18-0175	Manager of Contract Administration and Compliance	Appropriate Discipline	Resignation
18-0193 / 18-0194	Full-Time Faculty	DNRH (following resignation)	
18-0198 / 19-0084	Admissions Specialist	Resignation/DNRH (prior to conclusion of investigation)	
18-0206	College Clerical Assistant III	Termination / DNRH	
18-0219	Lead Security Officer (part-time)	Termination / DNRH	Resignation / DNRH
18-0232	IT Systems Administrator	Appropriate Discipline	5 Day Suspension
18-0237	Note Taker	Appropriate Discipline	Resignation / DNRH
19-0001	College Advisor	Appropriate Discipline	2 Day Suspension and Sexual Harassment training
19-0003	Interim Associate Dean of Student Services	Appropriate Discipline	2 Day Suspension and Sexual Harassment training
19-0004	College Advisor	Appropriate Discipline	2 Day Suspension and Sexual Harassment training
19-0005	College Advisor	DNRH (following resignation)	
19-0006	Admissions Specialist (part-time)	Resignation (prior to conclusion of investigation)	
19-0014	Chief Engineer	Termination / DNRH	

<sup>1</sup> "DNRH" means that the individual was designated "do not re-hire" or ineligible to be re-hired.

## Complaints Received

For the period of January 1, 2019 through June 30, 2019, the OIG received 116 complaints. These 116 complaints included complaints forwarded to the OIG from outside sources as well as investigations (or audits / reviews) initiated based on the OIG’s own initiative.<sup>2</sup> For purposes of comparison, the following graph documents the complaints received by the OIG during the current and previous reporting periods.<sup>3</sup>



The 116 complaints received represent a variety of subject matters. The table to follow documents the subject matters of the complaints received.

<sup>2</sup> Under Article 2.7.2 of the Board Bylaws, the powers and duties of the OIG include: c) To investigate and audit the conduct and performance of the District’s officers, employees, members of the Board, agents, and contractors, and the District’s functions and programs, either in response to a complaint or on the Inspector General’s own initiative, in order to detect and prevent waste, fraud, and abuse within the programs and operations of the District....

<sup>3</sup> During the January 1, 2010 through June 30, 2010 period and before, all of the OIG’s positions, including that of Inspector General, were part-time positions.

<b>Subject Matters of Complaints Received from January 1, 2019 to June 30, 2019</b>		
<b>Subject Matter (Allegation)</b>	<b>Number</b>	<b>Percentage</b>
Engaging in conduct in violation of the Illinois Compiled Statutes	2	1.72%
Violation of Outside Employment Policy	2	1.72%
Violation of Academic and Student Policy	2	1.72%
Sexual harassment	3	2.59%
Giving preferential treatment	3	2.59%
Misappropriation of funds / Theft	3	2.59%
Conduct unbecoming a public employee	4	3.45%
Falsification of employment records	5	4.31%
Failure to maintain confidentiality of CCC employment records	5	4.31%
Fraud (including grants, financial aid or tuition)	6	5.17%
Discourteous Treatment	7	6.03%
Violation of CCC Ethics Policy	7	6.03%
Residency	10	8.62%
Violation of miscellaneous CCC Policies	12	10.34%
Other Harassment / Retaliation / Discrimination	12	10.34%
Inattention to Duty	16	13.79%
Falsification of attendance records	17	14.66%
<b>Total</b>	<b>116</b>	<b>100.00%</b>

### Status of Complaints

As reported in the previous *Bi-Annual Report*, as of December 31, 2018, the OIG had 83 complaints that were pending, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of January 1, 2019 through June 30, 2019, the OIG closed 124 complaints. The following chart categorizes the reasons that the OIG closed the 124 complaints during the current reporting period.

<b>Complaints Closed Between January 1, 2019 and June 30, 2019</b>		
<b>Reason Closed</b>	<b>Number</b>	<b>Percentage</b>
Sustained	14	11.29%
Review with Recommendations	2	1.61%
Board Mandated Audit	1	0.81%
Not Sustained / No Policy Violation	30	24.19%
Referred / Deferred	58	46.77%
Subject Inactive	5	4.03%
Duplicate Complaint	9	7.26%
Complaint included with another active investigation	5	4.03%
<b>Totals</b>	<b>124</b>	<b>100.00%</b>

Regarding the complaints closed during the period of January 1, 2019 to June 30, 2019, the table below documents the average number of calendar days between the date that the complaints were received and the date that the complaints were closed as compared to the average number of calendar days

between the date that complaints were received and the date that complaints were closed for the complaints closed during the previous reporting period (July 1, 2018 through December 31, 2018).<sup>4</sup>

<b>Average Calendar Days to Close</b>				
<b>Reason Closed</b>	<b>7/1/18 to 12/31/18</b>		<b>1/1/19 to 6/30/19</b>	
	<b>Number</b>	<b>Average Calendar Days to Close</b>	<b>Number</b>	<b>Average Calendar Days to Close</b>
Sustained	16	158	14	252
Review with recommendations	0	0	2	144
Not Sustained / No Policy Violation	38	275	30	277
Not Sustained with Recommendations	1	223	0	0
Referred / Deferred	41	1	58	1
Completed Board Mandated Audit	0	0	1	102
Other	47	21	19	52
<b>Totals</b>	<b>143</b>		<b>124</b>	

As of June 30, 2019, the OIG had 75 pending complaints. 32 of these 75 pending complaints (43%) were received between January 1, 2019 and June 30, 2019, and 16 of these 75 pending complaints (21%) were received between July 1, 2018 and December 31, 2018.

**OIG Reports Submitted – January 1, 2019 through June 30, 2019**

During the January 1, 2019 through June 30, 2019 reporting period, the OIG submitted 17 reports.<sup>5</sup> These 17 reports included the following: 2 reports documenting OIG-initiated reviews; 14 reports documenting sustained findings of waste, fraud and/or misconduct; and the annual OIG Audit of the District’s Compliance with the Residency Policy.

**Report Submitted Documenting OIG-initiated Reviews**

OIG Case Number 19-0012 (Part-time Librarian Payroll Review)

The OIG conducted investigations of two part-time librarians assigned to a City College. The OIG’s findings and recommendations are documented under OIG

<sup>4</sup> A complaint is considered closed only after the investigative activity of the investigator to whom the complaint was assigned has been reviewed and approved by a Supervising Investigator or the Assistant Inspector General and then the Inspector General. In situations where a complaint is sustained, the complaint is not considered closed until the Investigative Summary documenting the investigation is prepared and submitted pursuant to Article 2.7.3 of the Board Bylaws.

<sup>5</sup> Pursuant to Article 2.7.3 of the Board Bylaws, the Inspector General submits reports to the Chancellor, the Board Chair, and the General Counsel at the conclusion of an investigation with recommendations for disciplinary or other action.

Case Numbers 18-0159 and 18-0173 on pages 17 to 19 of this Bi-Annual Report. Based on time and attendance/payroll issues revealed during those investigations, the OIG reviewed the time and attendance/payroll of the twenty-seven other part-time librarians who worked during the Spring 2018 term.

The OIG review of part-time librarian time and attendance/payroll during the 2018 Spring term revealed the following:

- Currently, the typical CCC part-time hourly employee records their time in the CCCWorks system by swiping in when they start their day, swiping out for lunch, swiping in from lunch, and swiping out at the end of their day. In the past, the typical CCC part-time hourly employee recorded these four times on Certificates of Attendance. However, even though they are hourly employees, part-time librarians do not record their start times, lunch breaks or end times for a given workday on their Certificates of Attendance. At most, the Certificates of Attendance submitted by part-time librarians record the number of total hours worked on a given day.
- Part-time librarians at six of the seven colleges submitted Certificates of Attendance reflecting the number of hours that they worked on a given day. The Certificates of Attendance submitted by the four part-time librarians at one City College included no documentation of the specific days or hours worked in a given pay period; only exceptions were documented.
- Part-time librarian payroll, as supported by time and attendance recorded via Certificates of Attendance, is routinely inaccurate.
  - The Certificates of Attendance submitted by eleven (48%) of the twenty-three part-time librarians, who submitted Certificates of Attendance reflecting the number of hours worked on given days, did not account for the same number of hours (+/- 1 hour) for which they were paid for the given days during the Spring 2018 term.
  - Nine of these twenty-three (39%) part-time librarians received overpayments during the Spring 2018 term totaling in excess of seventy-three hours and a value of \$1,900.00.
  - Two of these twenty-three (9%) part-time librarians received less pay than they should have received. The underpayments had a total value of about \$244.00.
- In at least four instances during the Spring 2018 term, part-time librarians were paid their full pay despite the fact that Certificates of Attendance for given pay periods could not be located.
- When a part-time librarian takes a paid excused absence pursuant to Article Xi(B) of his/her collective bargaining agreement, the day off is not

recorded in PeopleSoft payroll records. Thus, the CCC payroll system has no record of a part-time librarian's use of such excused absence time.

- Part-time librarians received holiday pay for days in which their typically scheduled workdays fell on CCC holidays. However, the collective bargaining agreement covering part-time librarians does not provide for such holiday pay.

Based on the review of part-time librarian time and attendance/payroll during the 2018 Spring term, the OIG recommended the following:

1. Due to the great inaccuracies inherent in the pay method discussed in this Investigative Summary, the OIG recommended that CCC cease the practice of determining the pay of part-time librarians pursuant to Lectureship Assignments. The OIG recommended that part-time librarians be treated as all other part-time, hourly employees, and their pay should be determined by the number of hours worked based on their start time, break times, and end times as recorded on Certificates of Attendance. The use of Certificates of Attendance should only be continued until part-time librarians' time and attendance is recorded via the CCCWorks time and attendance system.
2. CCC should determine whether it is legally and/or contractually obligated to pay holiday pay to part-time librarians. If not, CCC should determine whether such practice should continue.

The OIG's review of part-time librarian time and attendance/payroll focused on one term, the Spring 2018 term. The review revealed that the time and attendance records of part-time librarians supported by Lectureship Assignments and Certificates of Attendance were significantly inaccurate. One can only imagine how much waste CCC has been subjected to through overpayments and days off not accounted for over the many years that this antiquated and inaccurate time and attendance system has been in place.

#### OIG Case Number 19-0129 (PRTF review)

On May 27, 2015, Mayor Rahm Emanuel convened the Procurement Reform Task Force ("PRTF") to review the procurement policies and procedures of the City of Chicago and its sister agencies — Chicago Public Schools, Chicago Transit Authority, Chicago Housing Authority, City Colleges of Chicago, Chicago Park District, and Public Building Commission — and develop recommendations to enhance oversight, streamline processes, and implement best practices.

The PRTF was composed of the Chief Procurement Officer for the City of Chicago and the Chief Executive Officer, Executive Director, or Chancellor of the six participating sister agencies. The PRTF was co-chaired by the City's Chief

Procurement Officer and its Inspector General. The PRTF co-chairs formed a Working Group, which was composed of staff from the City of Chicago's Department of Procurement Services and its Office of Inspector General and was supported by the Mayor's Office, the Department of Innovation and Technology, and two private sector entities providing *pro bono* services.

The Task Force divided its work into two phases - findings and recommendations. In its first phase, the Working Group sought information and analyzed data regarding the current status of procurement at the City and its sister agencies. Based on a comprehensive survey of procurement and related topics, reviews of agency documents and other materials, as well as in-person meetings with each Participating Member, the Task Force drafted and adopted a set of forty-three findings.

The findings in these areas revealed opportunities for reform that broadly included: strengthening processes and controls and adopting best practices; ensuring greater consistency and coordination between the Participating Members both to improve internal processes and the vendor experience; and reducing administrative burden and cost through greater collaboration and shared services. These findings made clear that collective action by the City and its sister agencies must be taken in order to address certain inefficiencies, disparities, and gaps in standards, processes, and compliance.

In its second phase of work, the Task Force developed a series of recommendations to build a better procurement system exemplified by increased efficiency, maximum competition, reduced burden on vendors, leveraged buying power, and robust oversight. The recommendations were categorized in groups based on whether they can be implemented on an immediate, intermediate, or long-term basis – classifications representing the amount of work and resources required for implementation, not the recommendations' priority. The recommendations totaled 31.

The findings and recommendations of the PRTF were documented in the "Report of the Chicago Procurement Reform Task Force" dated November 17, 2015.<sup>6</sup>

Effective February 4, 2016, the CCC Board of Trustees adopted Board Report 32869. This Board Report authorized an intergovernmental agreement with the PRTF to implement the PRTF recommendations.

Following the submission of the "Report of the Chicago Procurement Reform Task Force," the PRTF issued quarterly reports and annual reports in 2016,

---

<sup>6</sup> The "Report of the Chicago Procurement Reform Task Force" can be found on the PRTF website at:  
<https://www.cityofchicago.org/content/dam/city/depts/dps/PressReleases/ChicagoProcurementTaskForcepdf.pdf>.

2017, 2018, and 2019. The City of Chicago Office of the Inspector General issued progress reports on the PRTF in May 2017 and May 2018.

In December 2018, the City of Chicago Office of the Inspector General requested the assistance of the Offices of Inspector General of the sister agencies to participate in a joint oversight project to evaluate and publicly report on the progress in the implementation of the recommendations made by the PRTF. The City of Chicago Office of the Inspector General reported on the project findings in the Third Annual PRTF Progress Report on June 4, 2019.

The OIG, as well as all of the Offices of Inspector General of the sister agencies and the Office of the Executive Inspector General for the Agencies of the Illinois Governor, participated in this project to evaluate the progress by their given agency in the implementation of the recommendations made by the PRTF. The City of Chicago Office of the Inspector General chose the sixteen recommendations to be reviewed.

The OIG preliminarily met with various members of the CCC Department of Administrative and Procurement Services, including the vice chancellor of administrative and procurement services and the district director of business and procurement services. The OIG made them aware of this review and identified the sixteen PRTF recommendations that would be the subject of the review.

Subsequently, through various interviews and documentary submissions from the Department of Procurement Services, the OIG documented the Department of Procurement Services' representations regarding CCC's compliance with the PRTF recommendations.

The OIG then sought to verify the Department of Procurement Services' representations of compliance by testing the Department of Procurement Services' statements, documentary submissions and provided examples. The OIG also identified other examples to verify the Department of Procurement Services' representations as to CCC's compliance with the PRTF recommendations.

At the conclusion of the testing/review, the OIG documented its findings in a matrix, which was submitted to the City of Chicago Office of the Inspector General for inclusion with the results of the reviews conducted by the other sister agencies. The results of the OIG's review of CCC's implementation of the PRTF recommendations were documented for CCC administration as follows.

OIG Findings – CCC’s Compliance with the Recommendations of the PRTF		
Number	Recommendation	OIG Finding
3	Establish minimum standards by which all Participating Members will publish their anticipated sole source awards, receive public and vendor feedback, and make decisions about whether a solicitation is necessary.	Partially Compliant
6	Post all contracts, vendors, and subcontractors on agency websites in a user-friendly and searchable format.	Partially Compliant
8	Establish minimum disclosure requirements for subcontractors and require posting subcontractor information online. The key deliverable for this recommendation is new, standard certification language to be added to specific solicitation documents and contracts utilized by the Participating Members. The language is as follows: “The Contractor certifies to the best of its knowledge and belief that it, its principals and any subcontractors used in the performance of this contract, meet the Agency requirements and have not violated any City or Sister Agency policy, codes, state, federal, or local laws, rules or regulations and have not been subject to any debarment, suspension or other disciplinary action by any government agency. Additionally, if at any time the contractor becomes aware of such information, it must immediately disclose it to the Agency.”	Partially Compliant
9	Establish minimum standards for conducting due diligence of vendors before entering into a contract.	Partially Compliant
10	Establish uniform rules governing re-solicitation of contracts due to significant changes in scope or value.	Partially Compliant
11	Evaluate the consistency of MBE/WBE/DBE certifications accepted by Participating Members.	Compliant
12	Implement the uniform criteria and processes for evaluating Good Faith Efforts regarding requests for waivers for MBE/WBE/DBE goals that are currently being developed and will be recommended by the Government Procurement Compliance Forum.	Compliant
13	Require a written, publicly posted protest process for each Participating Member.	Compliant
15	Establish a process for information-sharing and collaboration among Participating Members on personnel matters such as professional development efforts and recruitment.	Compliant
16	Establish uniform standards based on best practices for approval of noncompetitive awards, including small purchase, emergency, and sole source.	Compliant
20	Require each Participating Member to create a comprehensive procurement manual for its staff that is user friendly and available to the public.	Partially Compliant
21	Codify and provide training to Participating Members’ employees on procurement rules and regulations, including appropriate authority, prohibited communications, and reporting obligations.	Compliant
23	Develop uniform, minimum contract close out procedures for use by all Participating Members. A template checklist was developed in order to guide Participating Members regarding minimum steps to complete when closing out contracts. All Participating Members’ worked together to craft language for a checklist template to use in the contract closeout process.  Participating Members will be able to use this checklist as a base to ensure specific agency requirements are included. The Contract Closeout Checklist includes contract time frame, advertising dates, award amounts, evaluator information, legal analysis, financial analysis, term, extensions available, signatures needed, insurance requirements, website posting, MBE/WBE/DBE/ACDBE/BEPD information, and Board Reports.	Not Compliant
24	Develop minimum standards for project managers and other onsite review personnel to ensure vendor compliance.	Partially Compliant
25	Establish a process for information-sharing among Participating Members regarding poor performance, noncompliance, or wrongdoing of a vendor.	Compliant
26	Seek to establish reciprocal debarment among Participating Members through the use of a debarment review board or another mechanism as permitted by law.	Compliant

Based on the review and findings, the OIG recommended the following:

1. The OIG recommended that the completely revised version of the Purchasing and Contracting Policies be incorporated into Article 2 of the Board Policies and Procedures for Management and Government. Additionally, the completely revised version of the Purchasing and Contracting Policies should be posted and easily

- accessible to the public on the Department of Procurement Services' webpage.
2. The OIG recommended the following regarding posting contracts on the Department of Procurement Services' webpage:
    - a. The OIG recommended that the contracts database located on the Department of Procurement Services' webpage be updated to include all contracts executed in fiscal years 2018 and 2019, and that all contracts be added to the contracts database in a timely manner after their execution.
    - b. The OIG recommended that the contracts database located on the Department of Procurement Services' webpage be updated to allow for the independent search of subcontractors of CCC contracts via the contracts database search engine.
    - c. The OIG recommended that the "Contracts Awarded 2015-2017" spreadsheet that is posted on the Department of Procurement Services webpage be updated to include information regarding all contracts executed in fiscal years 2018 and 2019. Additionally, the spreadsheet should include a link to the executed contracts.
  3. The OIG recommended that in order to strengthen the due diligence efforts of obtaining information regarding applicant vendors, the Department of Procurement Services should obtain access to the Integrated Revenue Information System (IRIS) from the City of Chicago, in order to determine if a vendor has debt owed to the City of Chicago.
  4. The OIG recommended that a policy be adopted which governs the procedures to be followed when there is a significant change in the time frame of a contract.
  5. The OIG recommended that the CCC Procurement Policy and Procedures manual be posted to the Department of Procurement Services' webpage so that it is easily accessible to CCC employees and to the public.
  6. The OIG recommended that the Department of Procurement Services creates and uses a contract close out checklist in order to monitor and document the closing out of each contract.
  7. The OIG recommended that the Department of Procurement Services restores the practice of conducting site visits on projects in order to monitor vendor compliance.

**Reports Submitted Documenting Sustained Findings of Waste, Fraud and/or Misconduct**

OIG Case Number 18-0250

The OIG received a complaint alleging that a City College interim president inappropriately allowed a private basketball program to utilize the gym at his City College free of charge.

The OIG investigation revealed that at least two of the president’s sons participated in sessions with the private basketball program. The president and his wife paid \$300 to the private basketball program for the “Regular” program starting in September 2017.

The OIG investigation further revealed that four CCC Facilities Use Agreements revealed that for 90 days over several months during fall 2017 through summer 2018, the private basketball program was scheduled to use the City College gym, and the usage fees for the facilities were waived. The four agreements indicated that the reason for the fee waivers was per the president. The total fees waived on behalf of the private basketball program was \$70,800. The four Facilities Use Agreements are summarized in the table to follow:

<b>Facilities Use Agreements</b>				
<b>Time Period</b>	<b>Total Days Gym to be Used</b>	<b>Time of Use Each Day</b>	<b>Amount of Fees Waived</b>	<b>Board Report</b>
November 2017 and December 2017	21	6:00 p.m.-10:00 p.m.	\$16,725.00	None
January 2018 and February 2018	22	7:00 p.m.-10:00 p.m.	\$17,650.00	33430
April 2018 and May 2018	17	6:00 p.m.-10:00 p.m.	\$13,175.00	33461
June 2018, July 2018 and August 2018	30	5:00 p.m.-10:00 p.m.	\$23,250.00	None
<b>TOTAL</b>	<b>90</b>		<b>\$70,800.00</b>	

On May 31, 2018, the owner and founder of the private basketball program (“owner”) sent an email to the president’s CCC email address and to the email address of the president’s wife. This email stated the following:

The (president’s) family now has a (private basketball program) Lifetime Membership, with all rights and privileges. Thank you!

Less than one hour after the owner sent the aforementioned email regarding the lifetime membership to the president and his wife, the president forwarded the email to his personal email account. Both the president and his wife stated that they never accepted, paid for, or utilized the “lifetime membership” for their children.

The OIG investigation revealed that some portion of the private basketball program’s use of the City College gym was purportedly a “partnership” between the City College and the private basketball program to enhance community awareness of the City College and to serve as a precursor to a City College basketball program for community youth. However, the OIG investigation revealed that the “partnership” was significantly problematic from the start. The OIG based this conclusion on the following:

- During his interview with the OIG, the president stated that he did not think there was a formal business plan, proposal, or written document anywhere regarding the arrangement between the private basketball program and the City College. The OIG found that the owner drafted “plans” for the partnership between the private basketball program and the City College. These “plans” amounted to a few points indicated in emails dated September 21, 2017 and May 3, 2018. None of these plans came to fruition.
- Despite waiving more than \$70,000 in fees for the private basketball program’s use of the gym, the president and/or the City College failed to perform any of the following: identify a measurable and specifically documented goal of the “partnership”; study the value of the “partnership”; plan or perform any significant oversight; and/or review the private basketball program’s performance before waiving fees in the next Facilities Use Agreement.
- The private basketball program took advantage of the opportunity to use the gym at no cost. Although a “draft plan” is discussed in a September 21, 2017 email, there was no evidence that activities discussed in such plan ever took place. In the email dated May 3, 2018, previously mentioned above, the owner never indicated that the activities in the September 21, 2017 email took place. In fact, in an email dated May 29, 2018, the owner indicated that he had not taken any further steps besides his draft plan regarding the Saturday basketball camps. Moreover, during his interview with the OIG, the president had no reason to believe that the promised tasks were performed. Additionally, the OIG investigation did not reveal evidence that the basketball camps that the owner proposed ever took place. Being that there is no evidence that the tasks discussed in the September 21, 2017 email or the May 3, 2018 email took place, all the City College had left from the purported “partnership” was that the private basketball program used the City College’s gym for free for 90 days from

November 2017 through the summer of 2018. After August 2018, the City College failed to respond to the owner's inquiries regarding the additional use of the gym, and there was no more talk of a "partnership."

- The owner failed to cooperate with the OIG; thus, lacking subpoena power, the OIG was not able to obtain any information from the private basketball program. However, even though the president cooperated with the OIG's investigation, neither he nor anyone else at the City College could provide any specific data or information supporting their explanation that the purported "partnership" with the private basketball program had any value to the City College. In fact, at the time the OIG interviewed the president, which was approximately one year after the purported partnership began, the president had no meaningful data or assessment that the partnership was meeting the goals that he claimed. Specifically, during his interview with the OIG, the OIG investigator asked the president what the City College gained because of the exposure from the private basketball program's gym usage. The president stated that he never dug into who the specific participants were who used the gym from the private basketball program. The president stated that he could not pinpoint any specific outcomes from the partnership between the City College and the private basketball program. The president stated that he thought he heard some parents of the children playing in the private basketball program became involved in the Continuing Education Program at the City College. The president stated that he mostly heard this information "anecdotally or in passing."
- Despite claiming that he is a "data person," the president could not provide data regarding the kids who utilized the gym at the City College through the private basketball program. The president stated that he has not reached out to (an associate dean of student services) to find out who the students were who were using the gym from the private basketball program. The president stated that as of the date of his interview, he has not found out who the specific kids were who used the gymnasium because of this arrangement.
- The president stated that his idea would be that City College would move away from the pilot program through the private basketball program and move the program to the Continuing Education Program if the demand was there. The president stated that the end goal was that the City College would run their own program sessions like the private basketball program does for their grammar school students. The president stated that the City College still does not have a basketball class or program through their Continuing Education Program. The president stated that the City College is moving too slow regarding the creation of basketball classes.

It is reasonable to conclude that the purported “partnership” was simply a boon to the private basketball program. They were able to run their usual programs at no cost for the City College gym space. Such willingness to waive \$70,000 in revenue called into question the president’s judgment.

The OIG conducted a review of Board Reports regarding Facilities Use Agreements for the City College and its satellite campus, since the president has been president. This review revealed that there were 51 Facilities Use Agreements. Out of those 51 agreements, the fees for the use of the facilities were completely waived for 11 (21.6%) of those agreements, and the fees were partially waived for two (4%) of those agreements. Regarding the 11 agreements in which the facilities usage fees were completely waived, two of those agreements were regarding the private basketball program. (There were no Board Reports for two of the four agreements with the private basketball program). This review clearly revealed that during the president’s time as president, the private basketball program had the most fees waived and the most use of the facilities at the City College.

It is also significant to note that during the time period that the private basketball program used the City College gym at no cost, the private basketball program used Chicago Park District facilities on various dates and paid for the use of those facilities. The private basketball program rented gym space from the Chicago Park District on various days in November 2017, January 2018, February 2018, March 2018, and July 2018. The private basketball program paid at least \$1,417.50 for the aforementioned gym rentals. The private basketball program also rented gym space from the Chicago Park District on various days during several months in 2015 and 2016, and the private basketball program paid at least \$9,807.50 for those gym rentals.

Based on the investigation, the OIG made the following findings regarding the president, the private basketball program and its owner:

- The president gave preferential treatment in the course of his employment as the president of the City College, in that he waived the facilities usage fees for the use of the City College gym by the private basketball program, a basketball program of which his sons were part, in violation of Section IV(26) of the CCC District-Wide Employee Manual.
- The president wasted CCC funds, in that he waived fees totaling over \$70,000 for the private basketball program’s use of the City College gym, which provided no benefit to the City College or to CCC, in violation of Section IV(37) of the CCC District-Wide Employee Manual.
- Based on either or both of the above findings, the president engaged in conduct unbecoming a public employee, contrary to Section IV(50) of the CCC District-Wide Employee Manual.

- The private basketball program through its owner offered a gift to the president and his family of a lifetime membership to the private basketball program, in violation of Article 5.2.5 of the CCC Ethics Policy as codified in the Board Policies and Procedures for Management and Government.
- The private basketball program through its owner failed to cooperate with the OIG in an investigation, in violation of Article 2.7.4(b) of the Board Bylaws.

The OIG investigation further revealed that during October 2017, November 2017 and February 2018, the president allowed coaches and players from a parochial grammar school to use the City College gym on at least five total occasions. During his interview with the OIG, the president stated that there was no Facilities Use Agreement because he was in the gymnasium on these occasions shooting around, and he did not view the parochial grammar school as a program. However, on November 21, 2017, the president was on vacation when he notified City College staff that the parochial grammar school would be using the City College gym. Despite the fact that the parochial grammar school used the City College gym on these five occasions, submitted a Certificate of Liability Insurance for the “use of athletic facilities for school sponsored sports,” and named the City College as an additional insured, no CCC Facilities Use Agreement was ever created. Likewise, the parochial grammar school’s use of the City College gym was not disclosed on any Board Report. The parochial grammar school was not charged any fees for their use of the City College gym.

The parochial grammar is the school that the president’s three children attend. Two of the president’s sons were on the parochial grammar school’s basketball team during the 2017-2018 season, which was during the time that the parochial grammar school used the City College gym. During the Fall 2018 basketball season, the president served as a volunteer coach for the 6<sup>th</sup> grade boys’ basketball team at the parochial grammar school.

Based on the investigation, the OIG made the following findings regarding the president concerning the parochial grammar school’s use of the City College gym:

- On various occasions, the president allowed members of the parochial grammar school’s basketball team to use the City College gym without there being an executed Facilities Use Agreement regarding this arrangement, in violation of Article 8.1 of the Board Policies and Procedures for Management and Government.
- The president gave preferential treatment in the course of his employment as the president of the City College, in that he allowed the parochial grammar school basketball team members, which included his sons, to use the City College gym without obtaining a required Facilities Use

Agreement and without paying any fees, in violation of Section IV(26) of the CCC District-Wide Employee Manual.

- Based on either and both of the above findings, the president engaged in conduct unbecoming a public employee, contrary to Section IV(50) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended the following:

1. The OIG recommended that CCC takes appropriate disciplinary action against the president.
2. The OIG recommended that CCC takes appropriate disciplinary action against the private basketball program and its owner pursuant to the CCC Debarment Policy of Article 5.3 *et seq.* of the Board Policies and Procedures for Management and Government.
3. The OIG recommended that Article 5.2.6 of the CCC Ethics Policy, titled *Disposition of Gifts*, be amended to provide the following:

An officer or employee, his or her spouse or an immediate family member living with the officer or employee, does not violate this Policy if the recipient promptly takes reasonable action to return a gift, regardless of whether the gift was actually accepted, from a prohibited source to its source or gives the gift or an amount equal to its value to an appropriate charity that is exempt from income taxation under Section 501 (c) (3) of the Internal Revenue Code of 1986, as now or hereafter amended, renumbered, or succeeded. Moreover, an officer or employee shall immediately notify the City Colleges of Chicago Ethics Officer when a gift from a prohibited source is offered to the officer or employee, his or her spouse or an immediate family member living with the officer or employee.

Per the Chancellor, the president, who was in an interim position at the time, was issued a written warning.<sup>7</sup>

As of the date of this Bi-Annual Report, the debarment process regarding the private basketball program and its owner was pending.

#### OIG Case Number 18-0159

The OIG received information that a part-time librarian (“part-time librarian 1”) assigned to a City College was under investigation by a suburban municipal library for time and attendance-related issues. The OIG initiated an investigation of part-time librarian 1’s time and attendance regarding her CCC employment.

---

<sup>7</sup> Another individual was ultimately selected as the permanent president of the City College.

The OIG investigation revealed that on various occasions during the Fall 2017 term, part-time librarian 1 failed to correct erroneously submitted Certificates of Attendance, in violation of Article 4.11(c) of the CCC Board Policies and Procedures for Management and Government.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against part-time librarian 1. The OIG further recommended that CCC uses all reasonable and fiscally responsible remedies to recoup at least \$186.49 in funds overpaid to part-time librarian 1 during the Fall 2017 term.

Following the disciplinary process, the part-time librarian received a one-day suspension, and she was required to repay \$186.49 to CCC.

### OIG Case Number 18-0173

Pursuant to a time and attendance-related investigation of part-time librarian 1 as documented under OIG Case Number 18-0159 above, the OIG learned that during the Spring 2018 term, part-time librarian 2 worked on Saturdays with part-time librarian 1. As a result, the OIG initiated an investigation of part-time librarian 2's time and attendance during the Spring 2018 term. The OIG investigation revealed the following:

- Part-time librarian 2 arrived after her scheduled start time on twenty-three (88%) of the twenty-six days on which she worked during the Spring 2018 term.
- Part-time librarian 2 departed prior to her scheduled end time on nineteen (73%) of the twenty-six days on which she worked during the Spring 2018 term.
- Part-time librarian 2 worked less than a full day on twenty-five (96%) of the twenty-six days on which she worked during the Spring 2018 term. This includes fifteen days on which she worked at least one-half hour less than a full day, and nine days on which she worked at least one hour less than a full day.

Part-time librarian 2's actions violated Section IV, paragraphs 4, 7, 38, and 50 of the CCC District-Wide Employee Manual, as well as Article 4.11(c) of the Board Policies and Procedures for Management and Government.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against part-time librarian 2. The OIG further recommended that CCC uses all reasonable and fiscally responsible remedies to recoup \$481.83 in funds overpaid to part-time librarian 2 during the Spring 2018 term.

As of the date of this Bi-Annual Report, the disciplinary process regarding part-time librarian 2 was pending.

OIG Case Numbers 19-0090 and 19-0157

The OIG received a complaint alleging that a call center representative assigned to the District Office abused his FMLA time off requests. Based on this complaint, an investigation was initiated. The OIG subsequently received a complaint that the call center representative downloaded and printed “The Anarchist Cookbook” using the CCC computer network and equipment.<sup>8</sup> Based on this complaint, an investigation was initiated.

Regarding these two complaints, the OIG investigation revealed the following:

- The call center representative had a pattern of repeated absences in conjunction with vacations, holidays and other days, in violation of Section IV(4) of the CCC District-Wide Employee Manual.
- The call center representative accepted a leave of absence on fraudulent grounds, in that on various occasions, the call center representative utilized FMLA time even though on the given day he was not suffering from a serious health condition that made him unable to perform his job at CCC, in violation of Section IV(10) of the CCC District-Wide Employee Manual.
- The call center representative falsified attendance records, in that on various occasions, the call center representative utilized FMLA time even though on the given day he was not suffering from a serious health condition that made him unable to perform his job at CCC, in violation of Section IV(11) of the CCC District-Wide Employee Manual.
- The call center representative used sick leave in an unauthorized manner, in that on at least three days in July 2017, the call center representative used sick time when in fact he was not sick but “on vacation,” in violation of Section IV(13) of the CCC District-Wide Employee Manual.
- The call center representative used CCC property for unauthorized purposes, in that he used the CCC computer network to access and attempt to print a copy of “The Anarchist Cookbook” and other items for no

---

<sup>8</sup> According to the Wikipedia website, The Anarchist Cookbook, first published in 1971, is a book that contains instructions for the manufacture of explosives, rudimentary telecommunications phreaking devices, and related weapons, as well as instructions for home manufacturing of illicit drugs, including LSD. It was written by William Powell at the apex of the counterculture era to protest against United States involvement in the Vietnam War.

CCC work-related purpose, in violation of Section IV(19) of the CCC District-Wide Employee Manual.

- The call center representative violated the CCC Policies Governing the Use of Computing and Technology Resources, in that he used his CCC-issued computer to access a pornographic image and a pornographic video, which in turn is a violation of Section IV(45) of the CCC District-Wide Employee Manual.
- Based on any and/or all of the above findings, the call center representative engaged in conduct unbecoming a public employee, in violation of Section IV(50) of the CCC District-Wide Employee Manual.

Based on the investigations, the OIG recommended that CCC takes appropriate disciplinary action against the call center representative.

Following the disciplinary process, the call center representative was terminated, and he was designated ineligible to be re-hired.

#### OIG Case Number 19-0209

The OIG received a complaint that a part-time coordinator assigned to a City College watched a pornographic video and had his penis out of his pants in the room behind the front desk of the City College's library while on duty. The OIG investigation revealed that on April 17, 2019, a female janitor assigned to the City College entered the office behind the front desk of the City College's library, and she observed the coordinator viewing a sexually explicit movie and his penis was out. Although the coordinator denied that he engaged in such conduct, the evidence revealed that the female janitor was more credible than the coordinator. At a minimum, the coordinator's conduct violated Section (IV), paragraphs 15, 38, and 50 of the CCC District-Wide Employee Manual as well as Title 8-8-080 of the Municipal Code of Chicago.

Additionally, in reviewing the security video from April 11, 2019 and April 17, 2019, the OIG investigation revealed that the coordinator falsified his attendance records. On both of these days, the coordinator failed to accurately record the time and duration of his lunch periods. At a minimum, the coordinator's conduct violated Section (IV), paragraphs 11 and 50 of the CCC District-Wide Employee Manual, as well as Article 4.11(c) of the Board Policies and Procedures for Management and Government.

Prior to the OIG's submission of the Investigative Summary, the coordinator retired from his position with CCC. As such and based on the investigation, the OIG recommended that the coordinator be designated ineligible to be re-hired and that his personnel records reflect this designation.

The coordinator was subsequently designated ineligible to be re-hired.

OIG Case Number 19-0107

The OIG received a complaint that on November 29, 2018, a budget analyst entered a satellite facility of a City College and removed various items from an employee's desk without authority. The OIG investigation revealed that on November 20, 2018 and November 29, 2018, the budget analyst, who had once been assigned to the satellite facility but was then assigned to the main campus of the City College, entered the satellite facility before anyone assigned there arrived for work. The budget analyst removed completed grant-related, multi-page document packages from various desks, and she removed them from the premises. These document packages contained sensitive information, including bank account numbers for various City Colleges. Subsequently, the budget analyst disposed of the document packages by throwing them in the garbage. As a result of the budget analyst's actions, the document packages had to be recreated and/or reprinted. The budget analyst's actions violated Section IV, paragraphs 19, 25, 32, 43, 44, and 50 of the CCC District-Wide Employee Manual, as well as Article 5.2.7 of the CCC Ethics Policy.

Following the disciplinary process, the budget analyst resigned from her CCC position, and she was designated ineligible to be re-hired.

OIG Case Number 19-0093

The OIG received a complaint that a vice president assigned to a City College used her position to solicit business for her private consulting firm and for a private consulting firm operated by a director assigned to the District Office. The OIG submitted separate Investigative Summaries regarding the vice president and the director.

- OIG Case Number 19-0093 (the vice president)

The OIG investigation revealed that the vice president engaged in conduct unbecoming a public employee, in that she used information that she obtained in her role as the vice president to solicit work on behalf of her private consulting business, in violation of Section IV(50) of the CCC District-Wide Employee Manual.

The OIG investigation also revealed that during the week of June 4, 2018, the vice president represented on CCCWorks that she was working when in fact she was not. During that week, the vice president received "comp time" awarded to her by the City College president for purported significant extra hours that she worked during the Higher Learning Commission accreditation process at the City College. However, no records were maintained documenting the purported extra hours worked, and the use of

“comp time” was not documented in CCCWorks or in any other manner. Additionally, the OIG reviewed the vice president’s time and attendance for the five months immediately preceding the week that she used the “comp time.” Such review created great doubt as to the extent of the hours claimed as worked by the vice president during the City College’s accreditation process.

Based on the investigation, the OIG recommended the following:

- The OIG recommended that CCC takes appropriate disciplinary action against the vice president regarding the finding that she engaged in conduct unbecoming a public employee.
- The OIG found that CCC policies lack specific direction regarding non-bargained for employees and compensatory time. As such, the OIG recommended one of the following alternatives:
  - If CCC policy is/should be that compensatory time for non-bargained for employees is not recognized, such policy should be specifically delineated as part of the Board Policies and Procedures for Management and Government and/or the CCC District-Wide Employee Manual.
  - If CCC policy is/should be that compensatory time for non-bargained for employees is allowed, such policy should be specifically delineated as part of the Board Policies and Procedures for Management and Government and/or the CCC District-Wide Employee Manual. At a minimum, such compensatory time policy should include the following: positions/job codes entitled to earn compensatory time; positions/job codes authorized to approve compensatory time; how is compensatory time earned/utilized; how compensatory time balances are to be documented/maintained; are there limits to the amount of compensatory time that can be earned/utilized/banked; and whether compensatory time can ever be converted to pay.

The vice president was terminated.

- OIG Case Number 19-0093 (the director)

The OIG investigation did not reveal any wrongdoing on the part of the director regarding the solicitation of business by the vice president. However, during the course of that investigation, the OIG reviewed the website of the director’s private consulting company. The OIG investigation revealed that the director used CCC-produced videos of

programs at a City College - at which the director was previously assigned - on the website of his personal business under the heading "See Our Work" without the permission of CCC. Additionally, the OIG investigation revealed that the director used his CCC-issued laptop computer to do work for his private consulting business. The director's actions violated Section IV, paragraphs 19, 42, 44, 45 and 50 of the CCC District-Wide Employee Manual, as well as the CCC Ethics Policy and the Policies and the Guidelines Governing the Use of Computing and Technology Resources of the City Colleges of Chicago.

Based on the investigation, the OIG recommended the following:

- The OIG recommended that CCC takes appropriate disciplinary action against the director.
- The OIG recommended that CCC uses all legal but fiscally responsible remedies to ensure that the CCC-related videos are removed from the director's business website, at least until CCC grants the business appropriate permissions to use the video, and the business website displays the appropriate credit to CCC for the work.

The director was suspended without pay for a period of two weeks. The director also removed the CCC-produced videos from his private business' website.

#### OIG Case Number 18-0227

The OIG received a complaint alleging that a lecturer asked students for donations for suspect charities in order to receive extra credit in her course. The OIG investigation revealed that the lecturer gave preferential treatment in the course of her employment, in that she awarded extra credit to students who gave funds to the lecturer for charitable donations of the lecturer's choice. This action was contrary to Section IV(26) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the lecturer.

Following the disciplinary process, the lecturer received an oral warning.

Additionally, since the practice of awarding extra credit to students for monetary donations precludes students who are financially unable to provide monetary donations from the opportunity to earn extra credit, the OIG recommended that the CCC Academic and Student Policy be amended to include a provision which prohibits the awarding of extra credit in grading based upon any type of student-provided monetary contribution.

Per the Provost, “My team has identified an appropriate place in the policy document for such a provision and has logged the change to be part of the policy cycle that will go to the Board for approval in November 2019. The precise wording that we will put forward for consideration is: *It is prohibited to give extra credit or consideration for grading based upon any type of student-provided monetary or non-academic contribution.*”

OIG Case Number 19-0096

The OIG Bi-Annual Report for the reporting period of July 1, 2018 to December 31, 2018 summarized two OIG investigations regarding an admissions specialist at a City College.<sup>9</sup> After his resignation pursuant to those investigations, the admissions specialist returned to the City College to return items which belonged to CCC and to receive items that he left behind in his cubicle. The admissions specialist informed the administrator, who was attending to him, that there was a manila envelope that he needed in his desk drawer, and he asked her to retrieve it for him. The administrator went to the admissions specialist’s former desk, and she found an addressed, sealed manila envelope. Since the manila envelope had a return address of the City College, she would not give it to him as it was CCC property. When she later opened the manila envelope, she discovered nine sealed official transcripts for a student. The OIG was notified.

The OIG investigation revealed that a college clerical assistant assigned to the City College generated the nine official CCC transcripts for the one student and at least one transcript each for four other students at the behest of the admissions specialist. This occurred while the admissions specialist was still a CCC employee. The OIG investigation further determined that the students did not pay the requisite fees for the transcripts. The fees associated with the transcripts in question were at least \$150.00. The actions of the college clerical assistant violated Section IV, paragraphs 37, 38, and 50 of the CCC District-Wide Employee Manual, while the actions of the admissions specialist violated Section IV, paragraphs 26, 37, 38, and 50 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the college clerical assistant. As the admissions specialist previously resigned from his CCC position and he was designated ineligible to be re-hired, the OIG did not make any additional disciplinary recommendation regarding him.

Following the disciplinary process, the college clerical assistant received a one-day suspension, and she was to be re-trained on the proper protocol for printing official transcripts.

---

<sup>9</sup> See summary for OIG Case Numbers 18-0198 and 19-0084 on pages 9 and 10 of the Bi-Annual Report for the period of July 1, 2018 to December 31, 2018.

OIG Case Number 19-0197

The OIG received a complaint that a student mentor assigned to a City College used an image of his CCC student identification card on his personal webpage. The OIG investigation revealed that the student mentor used images of his CCC student identification card and his CCC business card on his private business' webpage. The student mentor also solicited non-CCC related business from CCC students while providing services to the students in his role as a CCC employee. The student mentor's actions violated Section IV, paragraphs 19, 42, 44, and 50 of the CCC District-Wide Employee Manual, as well as the Ethics Policy and the Outside Employment Policy. After his interview with the OIG, the student mentor removed the CCC-related images from his personal business' webpage.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the student mentor.

The student mentor's position, which was temporary in nature, ended on the same day that the OIG's Investigative Summary was issued.

OIG Case Number 19-0100

During the course of a high-level review of employee cash advances, the CCC Internal Audit Department ("Internal Audit") found that various documents maintained by a project student records coordinator assigned to a Middle College of a City College, appeared to be inappropriately altered. Internal Audit notified the OIG.

The OIG review of the documents and the interview of the project student records coordinator revealed that she "whited-out" 2017 dates on various and numerous forms and replaced the dates with 2018 dates to falsely make it appear that the forms were completed and signed in 2018. At a minimum, the project student records coordinator's actions violated Section IV, paragraphs 11, 38, and 50 of the CCC District-Wide Employee Manual.

The "whiting-out" of dates was significant. "Whiting-out" and changing the date next to a previously affixed signature was not simply an administrative act. The forms in question determined a student's eligibility for the particular program, as well as the amount of Federal Title I funds that would be received. The signature block containing the "whited-out" dates contains an affirmation that the information contained in the form is accurate. Such affirmation/form is not valid for the 2018-2019 school year if the date of the previously submitted 2017 form is simply altered to 2018.

Additionally, another form on which the dates were whited-out served to notify the parents of students of their rights regarding disputes about their child's

educational rights or services. The signature ensures that the parent is aware of his/her rights. If the date of the 2017 form is simply altered to 2018 without the parent's presence, the school has no valid record that the parent was made aware of his/her rights.

The project student records coordinator's actions were also significant in that her actions cast great doubt as to her work ethic and her overall integrity.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the project student records coordinator.

Following the disciplinary process, the project student records coordinator was suspended without pay for a period of five days.

#### OIG Case Number 16-0218

The OIG received a complaint that a full-time faculty member assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the faculty member resided in Richton Park, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual.

The OIG investigation further revealed that the faculty member falsified employment records, in that she fraudulently affirmed on a CCC residency certification document that she resided in Chicago, Illinois, when in fact she resided in Richton Park, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Prior to the OIG's submission of the Investigative Summary, the faculty member retired from her CCC position. As such and based on the investigation, the OIG recommended that the faculty member be designated ineligible to be re-hired and that the faculty member's personnel records reflect this designation.

The faculty member was subsequently designated ineligible to be re-hired.

#### OIG Case Number 18-0200

The OIG received a complaint that a coordinator of information technology assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the coordinator resided in South Holland, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual.

The OIG investigation further revealed that the coordinator falsified employment records, in that she fraudulently affirmed on a CCC residency certification document that she resided in Chicago, Illinois, when in fact she resided in South

Holland, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

After being notified that the OIG requested her presence for an interview and advised that the subject matter of the interview was her residency, the coordinator resigned from her CCC position. As such and based on the investigation, the OIG recommended that the coordinator be designated ineligible to be re-hired and that her personnel records reflect this designation.

The coordinator was subsequently designated ineligible to be rehired.

**Annual Audit of the District's Compliance with the CCC Residency Policy (OIG Case Number 19-0155)**

Under the heading *Annual Certification of Residency*, Article 4.6(a) of the Board Policies and Procedures for Management & Government, which sets forth the CCC Residency Policy, provides that on February 1<sup>st</sup> of each year every full-time CCC employee will be required to certify their compliance with the residency policy. The employee's certification shall include an oath or affirmation that the employee is not required to be an actual resident because he/she falls within one of the exceptions to the requirement or that the employee is an actual resident of the City of Chicago. Additionally, Article 4.6(a) provides that "the Inspector General shall conduct an annual audit of the District's compliance with this Policy and shall submit a report of audit findings to the Board no later than the first regularly scheduled public meeting of the Board following July 1<sup>st</sup> of each year." On May 13, 2019, the OIG submitted the 2019 Audit of Compliance with the District's Residency Policy.

On February 1, 2019, all full-time employees of CCC were sent an e-mail regarding the need to certify their Chicago residency for 2019 by completing the online *Annual Certification of Residency* form. The e-mail was sent to 1,960 full-time employees.

On April 1, 2019, the Office of Human Resources provided the OIG with the results of all of the responses received. The great majority (1,920) of the 1,960 (98%) full-time employees responded to the Annual Certification Process.

Of the 40 employees who did not respond, the OIG confirmed that 19 were on leaves of absence, 5 were on sabbatical leaves, 9 resigned, and one changed to part-time status. Therefore, all but 6 of the 1,960 full-time employees who were active and working during the 2019 certification of residency process responded. The table below documents the responses received District-Wide, as confirmed by the OIG.

<b>Response</b>	<b>Number</b>	<b>%</b>
No response	6	0.31%
No response due to employee being on a leave of absence	19	0.97%
No response due to employee being on sabbatical	5	0.26%
No response due to resignation or retirement of the employee	9	0.46%
No response due to employee moving to part-time status	1	0.05%
1. Required to be a resident, with correct address	1869	95.36%
2. Not required to be a resident, with correct address	8	0.41%
3. Required to be a resident, with incorrect address	3	0.15%
4. Not required to be a resident, with incorrect address	1	0.05%
5. Required to be a resident, but does not currently live within the City of Chicago	39	1.99%
<b>Total</b>	<b>1960</b>	<b>100.00%</b>

As part of the audit of compliance with the District’s residency requirement, the OIG analyzed these full-time employee responses. The OIG analysis of these responses revealed the following:

- Regarding the 1,872 employees who responded that they were required to be a resident of the City of Chicago (See Responses 1 and 3 in the table above):
  - Four of these 1,872 employees had documented exceptions to the residency requirement filed with the Office of Human Resources. Three of the four had a City of Chicago address listed in the CCC PeopleSoft system.
  - As of the date that the OIG’s report of the 2019 Audit of Compliance with the District’s Residency Policy was released (5/13/2019), the OIG had active investigations regarding 18 of these 1,872 full-time employees who represented that they were required to be a resident of the City of Chicago.
  
- Regarding the 9 employees who responded that they were not required to be a resident of the City of Chicago (See Responses 2 and 4 in the table above):
  - Six of these 9 employees fell within an exception to the CCC residency requirement.
    - Three of these 6 employees were hired before July 1, 1977.
    - Three of these 6 employees were exempt from the CCC residency requirement due to side letter agreements.
  - Two of these 9 employees received approved extensions.
  - As of the date that the OIG’s report of the 2019 Audit of Compliance with the District’s Residency Policy was released (5/13/2019), the OIG had an active investigation regarding one of these 9 employees.

- Regarding the 39 employees who responded that they were required to be residents but did not currently reside within the City of Chicago (See Response 5 in the table above):
  - Eleven of the 39 employees were employed for less than six months or received approved extensions.
  - Twenty-eight of the employees responded that they did not currently reside within the City of Chicago, despite the fact that CCC records indicated a City of Chicago residential address for the employee.
    - The OIG sent each of these 28 employees a request to explain whether their submission was a mistake.
    - One of the 28 employees resigned from employment with CCC effective March 30, 2019; thus, the employee did not respond.
    - Twenty-seven of the employees replied to the OIG's inquiry.
      - Twenty-six of those 27 employees responded that they checked the wrong box on the Annual Certification of Residency online form, and they currently reside at their listed City address.
        - The OIG reviewed CCC personnel records and public records regarding these 26 employees. This review revealed that 25 of the 26 employees appeared to reside in the City of Chicago, which is consistent with their responses to the OIG that they checked the wrong box on the Annual Certification of Residency online form.
        - As of the date that the OIG's report of the 2019 Audit of Compliance with the District's Residency Policy was released (5/13/2019), the OIG had an active investigation regarding one of these 26 employees.
      - One of the 27 employees responded that she did not currently live in the City of Chicago. This employee was employed with CCC for less than six months. The OIG will monitor this employee's residency status.
- Regarding the 6 employees who failed to respond but were active and working employees, the Office of Human Resources worked with their business partners to initiate disciplinary action for their failures to respond.
  - One of these employees had a documented exception to the residency requirement filed with the Office of Human Resources.
  - CCC records indicated a City of Chicago residential address for the all six of these employees.

- The OIG reviewed CCC personnel records and public records regarding these six employee who did not respond. This review revealed that all six of the employees appeared to reside in the City of Chicago.

As a result of OIG investigations completed during calendar year 2018, three employees were terminated for violating the CCC Residency Policy, and two employees resigned after being interviewed by the OIG regarding their residency. As reported in this Bi-Annual Report, through June 2019, the OIG sustained two investigations regarding violations of the CCC Residency Policy. (See summaries for OIG Cases Numbers 16-0218 and 18-0200 documented on pages 26 and 27 of this Bi-Annual Report.