

CITY COLLEGES[®]
OF CHICAGO

JANUARY 1, 2024 - JUNE 30, 2024

Office of the Inspector General
BI-ANNUAL REPORT

Lamesha Smith
Inspector General
City Colleges of Chicago



CITY COLLEGES[®]
OF CHICAGO

To: Juan Salgado, Chancellor
Katya Nuques, Chair of the Board of Trustees
Rev. Dr. Marshall Elijah Hatch, Sr., Vice-Chairperson of the Board of Trustees
Peggy A. Davis, Secretary of the Board of Trustees
Elizabeth Swanson, Trustee
Darlene Oliver Hightower, J.D., Trustee
Oscar Sanchez, Trustee
David Ramirez, Student Trustee

From: Lamesha Smith, Inspector General

Date: August 15, 2024

RE: Office of the Inspector General *Bi-Annual Report* for the period of January 1, 2024 through June 30, 2024

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, 2024 through June 30, 2024. Pursuant to Article 2.7.5, the *Bi-Annual Report* for the period of January 1st through June 30th is required to be provided no later than September 1st each year.

Article 2.7 et seq. of the Board Bylaws authorizes the Office of the Inspector General 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 Office of the Inspector General 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

The Office of the Inspector General (“OIG”) for the City Colleges of Chicago (“CCC”) has the authority to conduct investigations regarding waste, fraud and misconduct by any officer, employee, member of the Board;¹ any contractor, subcontractor, consultant or agent providing or seeking to provide goods or services to CCC; and any program administered or funded by the District² or Colleges.³

The full scope of the powers and duties of the OIG can be found in Article 2.7 of the Bylaws of the Board of Trustees, which can be accessed here: <https://www.ccc.edu/departments/Documents/Board%20Bylaws.pdf>.

Mission of the Office of the Inspector General

The OIG for 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.

¹ Under Article 1.1 of the Bylaws of the Board of Trustees, the Board refers to the Board of Trustees of the Community College District No. 508, County of Cook, State of Illinois.

² Under Article 1.1 of the Bylaws of the Board of Trustees, the District refers to the Community College District No. 508.

³ Under Article 1.1 of the Bylaws of the Board of Trustees, the Colleges refer collectively to the seven separately accredited colleges which make up CCC.

Make a Confidential Complaint

Anyone can make a confidential complaint regarding waste, fraud and misconduct involving CCC programs, Board members, officials, employees, or those doing or seeking to do business with CCC in any manner with which they are comfortable, including the methods listed below:

- **Clicking** [here and submitting](#) a confidential complaint online
- **Sending** an e-mail to InspectorGeneral@ccc.edu
- **Calling** the OIG Fraud Hotline at (312) 553-3399
- **Mailing** a letter to:
The Office of the Inspector General
City Colleges of Chicago
740 North Sedgwick Street
Suite 310
Chicago, Illinois 60654
- **Making** an in-person complaint at 740 North Sedgwick, Suite 310

New Developments

Deputy Inspector General

Effective June 3, 2024, Daniel Ostrovsky started as the Deputy Inspector General. Daniel Ostrovsky is an attorney with significant legal experience, including previous experience in an inspector general's office.

Dispositions in Federal Case

As discussed in the OIG *Bi-Annual Report* for the period of July 1, 2019 through December 31, 2019, on November 19, 2019, as a result of an investigation initiated by the OIG and worked in partnership with the Federal Bureau of Investigation ("FBI") and the Office of the United States Attorney for the Northern District of Illinois, a federal grand jury indicted three CCC employees (a former vice chancellor, a former project director, and a now former liaison with local government agencies) as well as five CCC vendors.⁴ The indictment totaled sixteen counts of wire fraud and two counts of making a false statement to the FBI.

In previously submitted Bi-Annual Reports, the OIG detailed the dispositions regarding defendants in this federal case. There have since been dispositions

⁴ Copies of the press release from the United States Attorney for the Northern District of Illinois and the indictment can be accessed at the following link: <https://www.justice.gov/usao-ndil/pr/federal-indictment-charges-former-vice-chancellor-city-colleges-chicago-devising>.

regarding the remaining defendants, and those dispositions are detailed as follows.⁵

- Marva Smith, a former CCC liaison with local government agencies, was indicted on two counts of wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1346. On August 31, 2023, Marva Smith entered into a Plea Agreement with the Acting United States Attorney for the Northern District of Illinois. By the Plea Agreement, Marva Smith agreed to enter a voluntary plea of guilty to Count 8 of the indictment, which charged Marva Smith with wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1346. Subsequently, the United States District Court for the Northern District of Illinois found Marva Smith guilty of the offense of fraud by wire, radio, or television as to Count 8 of the indictment, specifically violating Title 18, United States Code, Section 1343. On February 13, 2024, Marva Smith was sentenced, and she was ordered to serve two years of probation and ordered to pay restitution in the amount of \$41,000 to CCC.
- Krystal Stokes, a former CCC project director, was indicted on two counts of wire fraud, in violation of Title 18, United States Code, Section 1343, as well as one count of making a false statement to the FBI, in violation of Title 18, United States Code, Section 1001(a)(2). On December 15, 2020, Krystal Stokes entered into a Plea Agreement with the United States Attorney for the Northern District of Illinois. By the Plea Agreement, Krystal Stokes agreed to enter a voluntary plea of guilty to Count 7 of the indictment, which charged Krystal Stokes with wire fraud, in violation of Title 18, United States Code, Section 1343. Subsequently, the United States District Court for the Northern District of Illinois found Krystal Stokes guilty of the offense of wire fraud as to Count 7 of the indictment, specifically violating Title 18, United States Code, Section 1343. On March 12, 2024, Krystal Stokes was sentenced, and she was given one day time considered served in the Federal Bureau of Prisons. Further, Krystal Stokes was ordered to pay restitution in the amount of \$25,000 to CCC.
- Angelique Orr, the principal of a CCC vendor, was indicted on five counts of wire fraud, in violation of Title 18, United States Code, Section 1343. The disposition regarding Angelique Orr and the OIG's subsequent recommendation are detailed later in this *Bi-Annual Report* in the OIG Reports Submitted section under OIG Case Number 17-0179 – Angelique Orr.

⁵ Notably, the disposition regarding Sharod Gordon was detailed in the OIG *Bi-Annual Report* for the period of July 1, 2022 through December 31, 2022.

- Nancy Vazquez, the principal of a CCC vendor, was indicted on two counts of wire fraud, which included violations of Title 18, United States Code, Sections 1343 and 1346. The disposition regarding Nancy Vazquez and the OIG's subsequent recommendation are detailed later in this *Bi-Annual Report* in the OIG Reports Submitted section under OIG Case Number 17-0179 – Nancy Vazquez.

In June 2024, the OIG closed OIG Case Number 17-0179 because there had been dispositions regarding all the defendants who were charged in this federal case.

Updates to Investigations Documented in Previous Bi-Annual Reports

Update regarding recommendations made during the January 1, 2022 to June 30, 2022 reporting period

Among the reports documented in the *Bi-Annual Report* submitted for the January 1, 2022 to June 30, 2022 reporting period, there is an update regarding recommendations that the OIG made in a report, submitted on June 30, 2022, regarding OIG Case Number 21-0117. OIG Case Number 21-0117 was an OIG-initiated review⁶ of active CCC vendors to determine if any active vendors have been debarred by other government agencies.

Effective April 4, 2024, as a result of OIG recommendations, two vendors and their principals were permanently debarred from doing any future business with CCC.

Update regarding report submitted during the July 1, 2022 to December 31, 2022 reporting period

Among the reports documented in the *Bi-Annual Report* submitted for the July 1, 2022 to December 31, 2022 reporting period, there is an update regarding OIG Case Number 19-0151. OIG Case Number 19-0151 was an OIG-initiated investigation, in which the OIG worked with the Cook County State's Attorney's Office to investigate the alleged criminal activity of a now former CCC head coach.

During the course of the investigation under OIG Case Number 19-0151, the OIG found evidence to suggest that the head coach used CCC property, including computers, printers and scanners, to create fraudulent documents for individuals

⁶ Under Article 2.7.2 of the Bylaws of the Board of Trustees, 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.

to submit to the Cook County Sheriff's Office's Electronic Monitoring Program. The OIG found other numerous apparently fraudulent documents on the CCC computer hard drive that was assigned to the head coach.

In August 2022, the former head coach was arrested for forgery. Subsequently, a grand jury of the Circuit Court of Cook County returned an indictment regarding the head coach, which included 11 counts of forgery and two (2) counts of continuing financial crimes enterprise. The former head coach initially pleaded not guilty to all 13 charges.

The former head coach then pleaded guilty to forgery as to Count 4 of the indictment. In June 2024, the former head coach was sentenced to a term of 24 months of adult probation. Additionally, the former head coach was ordered to perform 180 hours of community service.

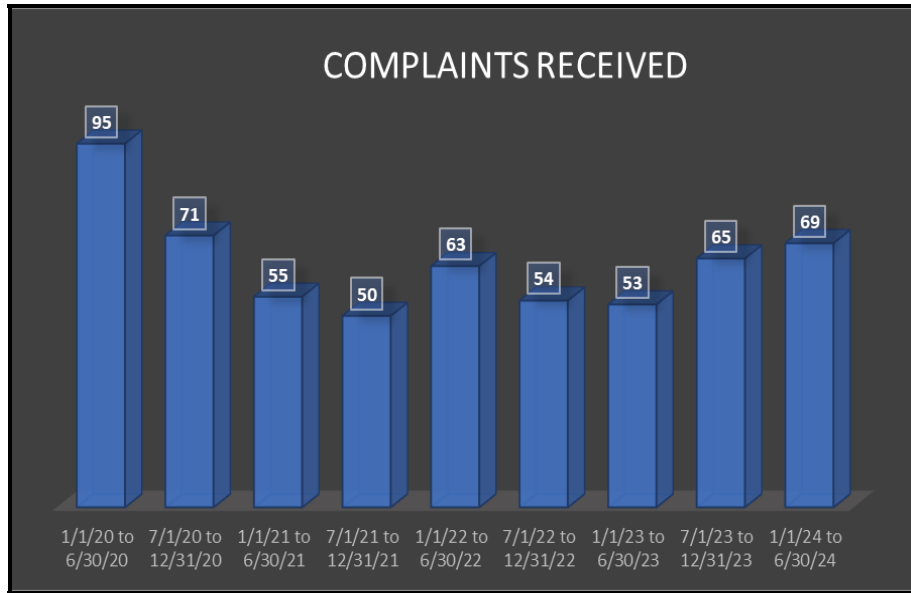
Update regarding recommendation made during the July 1, 2023 to December 31, 2023 reporting period

Among the reports documented in the *Bi-Annual Report* submitted for the July 1, 2023 to December 31, 2023 reporting period, there is an update regarding a recommendation that the OIG made in a report, submitted on November 8, 2023, regarding OIG Case Number 17-0179. In the aforementioned report, the OIG detailed admissions that Tiffany McQueen, a principal of a CCC vendor, made in a Plea Agreement with the Acting United States Attorney for the Northern District of Illinois. Based on the admissions made by Tiffany McQueen as well as her subsequent federal criminal conviction for wire fraud, Tiffany McQueen, as the principal and sole proprietor of the CCC vendor company, engaged in various acts which served as causes for debarment pursuant to the CCC Debarment Policy. Moreover, since Tiffany McQueen's conduct occurred in connection with her performance of duties for or on behalf of the CCC vendor company, her conduct should have been imputed to the CCC vendor company. Thus, the OIG recommended that CCC initiates the process to permanently debar Tiffany McQueen and the CCC vendor company from doing any future business with CCC pursuant to the CCC Debarment Policy of Article 5.3 *et seq.* of the Board Policies and Procedures for Management and Government.

Subsequently, effective April 4, 2024, Tiffany McQueen and the vendor company were permanently debarred from doing any future business with CCC.

Complaints Received

For the period of January 1, 2024 to June 30, 2024, the OIG received 69 complaints. These 69 complaints included complaints forwarded to the OIG from outside sources as well as investigations initiated based on the OIG’s own initiative. The following table documents the complaints received by the OIG during the current and previous reporting periods.



The 69 complaints received represent a variety of subject matters. The following table documents the subject matters of the complaints received.

Subject Matter of Complaints Received from January 1, 2024 to June 30, 2024		
Subject Matter (Allegation)	Number	Percentage
Board Mandated Audit	1	1.45%
Conduct Unbecoming of a Public Employee	1	1.45%
Incompetence in the Performance of the Position	1	1.45%
Sexual Harassment	1	1.45%
Misappropriation of Funds	1	1.45%
Violation of Title IX	1	1.45%
Violation of Responsible Computer Use Policy	1	1.45%
Failure to Make an Immediate Incident Report	1	1.45%
Theft	1	1.45%
Falsification of Records	2	2.90%
Residency	2	2.90%
Engaging in Conduct in Violation of the Illinois Compiled Statutes	2	2.90%
Unknown	4	5.80%
Fraud	4	5.80%
Discourteous Treatment	5	7.25%
Preferential Treatment	5	7.25%
Violation of Outside Employment Policy	5	7.25%
Violation of CCC Ethics Policy	6	8.70%
Inattention to Duty	10	14.49%
Falsification of Attendance Records	15	21.74%
Total	69	100%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of December 31, 2023, the OIG had 64 pending complaints, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of January 1, 2024 through June 30, 2024, the OIG closed 69 complaints. The following chart categorizes the reasons that the OIG closed the 69 complaints during the current reporting period.

Complaints Closed Between January 1, 2024 through June 30, 2024		
Reason Closed	Number	Percentage
Completion of Board Mandated Audit	1	1.45%
Sustained	2	2.90%
Not Sustained / No Policy Violation	21	30.43%
Complaint Included with Another Active Investigation	19	27.54%
Referred / Deferred	13	18.84%
Duplicate Complaint	7	10.14%
Administratively Closed	4	5.80%
Subject Inactive	2	2.90%
Totals	69	100%

Regarding the complaints closed during the period of January 1, 2024 to June 30, 2024, 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, 2023 to December 31, 2023).⁷

Average Calendar Days to Close				
Reason Closed	7/1/23 to 12/31/23		1/1/24 to 6/30/24	
	Number	Average Calendar Days to Close	Number	Average Calendar Days to Close
Sustained	1	441	2	1,594 ⁸
Completed Board Mandated Audit	-	-	1	144
Not Sustained / No Policy Violation	24	349	21	521
Referred / Deferred	18	5	13	3
Subject Inactive	4	435	2	624
Duplicate Complaint	9	1	7	3
Complaint Included with an Active Investigation	10	1	19	1
Administratively Closed	2	567	4	217
Subject Already Disciplined	1	300	-	-
Totals	69		69	

As of June 30, 2024, the OIG had 61 pending complaints. Eighteen (18) of these 61 pending complaints (29.5%) were received between January 1, 2024 and June 30, 2024, and twelve (12) of these 61 pending complaints (19.7%) were received between July 1, 2023 and December 31, 2023.

⁷ 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 Deputy 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 Bylaws of the Board of Trustees.

⁸ This average includes OIG Case Number 17-0179. OIG Case Number 17-0179 was initiated in February 2017 and remained open while the federal charges against the defendants remained pending. As was previously indicated in this *Bi-Annual Report*, in June 2024, the OIG closed OIG Case Number 17-0179 after there were dispositions regarding all the defendants who were charged in this federal case.

OIG Reports Submitted – January 1, 2024 through June 30, 2024

During the reporting period of January 1, 2024 to June 30, 2024, the OIG submitted four reports.⁹ The reports were regarding the following: three reports documenting sustained findings of waste, fraud and/or misconduct as well as one report documenting the annual Board-mandated audit of the District's compliance with the CCC Residency Policy.

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

OIG Case Number 23-0006

The OIG received a complaint alleging that a training specialist assigned to a City College had been arriving late to work and had been letting students leave class early. Based on this complaint, the OIG initiated an investigation.

The OIG investigation revealed the following:

- The training specialist falsely represented the quantity of work performed, in that on numerous days during the Summer 2022 term, he failed to be physically present at the City College for a significant portion of his class times despite reflecting on his Certificates of Attendance that he worked a regular work day on those days, in violation of Section IV(7) of the CCC District-Wide Employee Manual.
- The training specialist falsified his attendance records, in that on numerous days during the Summer 2022 term, he failed to be physically present at the City College for a significant portion of his class times despite reflecting on his Certificates of Attendance that he worked a regular work day on those days, in violation of Section IV(11) of the CCC District-Wide Employee Manual.
- The training specialist was inattentive to his duty as a project training specialist, in that on numerous occasions during the Summer 2022 term, he failed to be physically present at the City College as required for a significant portion of his class times, in violation of Section IV(38) of the CCC District-Wide Employee Manual.
- Based on the above findings, the training specialist engaged in conduct unbecoming a public employee, in violation of Section IV(50) of the CCC District-Wide Employee Manual.

⁹ Pursuant to Article 2.7.3 of the Bylaws of the Board of Trustees, the Inspector General submits reports to the Chancellor, the Board Chairperson, and the General Counsel at the conclusion of an investigation with recommendations for disciplinary or other action.

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

Subsequently, CCC issued the training specialist a suspension for five workdays without pay.

OIG Case Number 17-0179 – Angelique Orr

As noted earlier in this *Bi-Annual Report*, on November 19, 2019, as a result of an investigation initiated by the OIG and worked in partnership with the FBI and the Office of the United States Attorney for the Northern District of Illinois, a federal grand jury indicted three CCC employees and five vendors, including Angelique Orr, the principal of a CCC vendor, who was indicted on five counts of wire fraud, in violation of Title 18, United States Code, Section 1343.

On December 18, 2023, Angelique Orr entered a plea of guilty as to one of the counts of wire fraud in the indictment. Subsequently, the United States District Court for the Northern District of Illinois found Angelique Orr guilty of wire fraud as to Count 2 of the indictment, specifically violating Title 18, United States Code, Section 1343.

On April 1, 2024, Angelique Orr was sentenced, and she was ordered to serve two years of probation and ordered to pay restitution in the amount of **\$29,500** to CCC.

Angelique Orr's federal criminal conviction for wire fraud served as cause for debarment pursuant to the CCC Debarment Policy, as contained in Article 5.3 of the Board Policies and Procedures for Management and Government.

Thus, the OIG recommended that CCC initiates the process to permanently debar Angelique Orr and the CCC vendor from doing any future business with CCC pursuant to the CCC Debarment Policy of Article 5.3 *et seq.* of the Board Policies and Procedures for Management and Government.

The OIG recommendation is under review by the CCC Department of Business and Procurement Services.

OIG Case Number 17-0179 – Nancy Vazquez

As noted earlier in this *Bi-Annual Report*, on November 19, 2019, as a result of an investigation initiated by the OIG and worked in partnership with the FBI and the Office of the United States Attorney for the Northern District of Illinois, a federal grand jury indicted three CCC employees and five vendors, including Nancy Vazquez, the principal of a CCC vendor, who was indicted on two counts of wire fraud, which included violations of Title 18, United States Code, Sections 1343 and 1346.

On September 19, 2023, Nancy Vazquez entered a plea of guilty as to Count 12 of the indictment. Subsequently, the United States District Court for the Northern District of Illinois found Nancy Vazquez guilty of the offense of fraud by wire involving the right to honest services as to Count 12 of the indictment, specifically violating Title 18, United States Code, Sections 1343 and 1346.

On December 14, 2023, Nancy Vazquez was sentenced, and she was ordered to serve two years of probation and ordered to pay restitution in the amount of **\$25,000** to CCC.

Nancy Vazquez's federal criminal conviction for wire fraud served as cause for debarment pursuant to the CCC Debarment Policy, as contained in Article 5.3 of the Board Policies and Procedures for Management and Government.

The OIG investigation revealed that Nancy Vazquez controlled two separate CCC vendors. While a current CCC vendor, Nancy Vazquez formed another business so that it could become a CCC vendor for the purpose of carrying out the wire fraud scheme.

Thus, the OIG recommended that CCC initiates the process to permanently debar Nancy Vazquez and the two CCC vendors from doing any future business with CCC pursuant to the CCC Debarment Policy of Article 5.3 *et seq.* of the Board Policies and Procedures for Management and Government.

The OIG recommendation is under review by the CCC Department of Business and Procurement Services.

Annual Audit of the District's Compliance with the CCC Residency Policy

OIG Case Number 24-0073

On June 25, 2024, the OIG submitted the 2024 Audit of Compliance with the District's Residency Policy.

Article 4.6(a) of the Board Policies and Procedures for Management & Government sets forth the CCC Residency Policy. Article 4.6(a), under the heading *Annual Certification of Residency*, provides that on February 1st 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 1st of each year."

On February 1, 2024, all full-time CCC employees were sent an email regarding the need to certify their Chicago residency for 2024 by completing the online *Annual Certification of Residency* form, with directions on how to complete the form online.

On May 30, 2024, the Office of Human Resources provided the OIG with the results of all the responses received. Subsequently, on June 20, 2024, the OIG also obtained updated results of all the responses received.

In total, as of June 20, 2024, 1,955 (91%) of the 2,154 full-time employees responded to the Annual Certification of Residency.

Of the 199 employees who did not respond, the OIG confirmed that 13 changed employment status to terminated during the certification period, one (1) changed employment status from full-time to part-time during the certification period, 23 were on leaves of absence, and three (3) were on sabbatical leaves. Therefore, 159 of the full-time employees who were active and working during the 2024 certification of residency process did not respond. The table below documents the responses received District-Wide, as confirmed by the OIG.

Response	Number	%
No response	159	7.38%
No response – employee status changed to terminated during certification period	13	0.60%
No response – employee status changed from full-time to part-time during certification period	1	0.05%
No response – employee on a leave of absence	23	1.07%
No response – employee on sabbatical	3	0.14%
1. Required to be a resident, with correct address	1,895	87.98%
2. Not required to be a resident, with correct address	5	0.23%
3. Required to be a resident, with incorrect address	8	0.37%
4. Not required to be a resident, with incorrect address	0	0.00%
5. Required to be a resident, but does not currently live within the City of Chicago	47	2.18%
Total	2154	100%

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 1,903 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):
 - As of June 20, 2024, the OIG had active investigations regarding seven (7) of the 1,903 full-time employees who represented that they were required to be a resident of the City of Chicago.

- Regarding the five (5) 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):
 - Four (4) of the five (5) employees fell within an exception to the CCC residency requirement.
 - One (1) of the four (4) employees was hired before July 1, 1977.
 - Three (3) of the four (4) employees were exempt from the CCC residency requirement due to side letter agreements.
 - One (1) of the five (5) employees did not fall within an exception to the CCC residency requirement.
 - The OIG reviewed Annual Certification of Residency online forms that this employee previously submitted, which revealed that each year from 2013 through 2023, the employee certified that they were required to be a resident of the City of Chicago. Additionally, the OIG reviewed CCC personnel records and public records regarding this employee. This review revealed that the employee appeared to reside in the City of Chicago. As such, the OIG

determined that the employee most likely checked the wrong box on the Annual Certification of Residency online form.

- Regarding the 47 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):
 - Five (5) of the 47 employees were full-time employees for less than six months.
 - Three (3) of the 47 employees received approved residency extensions.
 - Thirty-nine (39) of the 47 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 reviewed CCC personnel records and public records regarding these 39 employees. This review revealed that the 39 employees appeared to reside in the City of Chicago. As such, the OIG determined that the 39 employees most likely checked the wrong box on the Annual Certification of Residency online form.

- Regarding the 159 employees who failed to respond, but were active and working employees:
 - CCC records indicated a City of Chicago residential address for 158 of the 159 employees. The OIG reviewed public records regarding these 158 employees. This review revealed that these 158 employees appeared to reside in the City of Chicago.
 - One (1) of the 159 employees who failed to respond did not have a City of Chicago residential address on file in CCC records. However, this one employee had been a full-time employee for less than six months.
 - The OIG will continue to inquire with the Office of Human Resources regarding its plan for direct follow ups with employees who failed to respond but were active and working employees during the certification period, as well as its plan for taking appropriate disciplinary action against active and working employees who subsequently fail to comply with the Annual Certification of Residency process.

Cover page photo: Adobe Stock