

CHICAGO PARK DISTRICT OFFICE OF INSPECTOR GENERAL

PETER NEUMER, INSPECTOR GENERAL

2023 OIG ANNUAL REPORT



Message from the Inspector General:

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

2023 was an exciting year for the Chicago Park District Office of Inspector General (OIG). Most notably, in August, the OIG smoothly transitioned from an interim Inspector General to a Board-appointed Inspector General. During the first year of my four-year term, I will be prioritizing the development and implementation of internal directives and policies for all sections of the office, to promote greater uniformity and efficiency in the carrying out of OIG operations. The OIG has already issued 9 directives, including investigative planning and audit planning directives that require the creation of investigative plans and project plans at the onset of each matter, which should help OIG use its resources more efficiently. In 2024, the OIG will continue this initiative by creating manuals for the OIG's investigative and hiring compliance sections that will codify OIG practices.

The OIG will also be giving increased attention to its hiring compliance oversight function. As evidence of this commitment, in the last quarter of 2023 the OIG:

- Created a comprehensive, interactive Employment Plan training document for Human Resources (HR) staff and then provided a two-hour in-person training in November 2023 for 18 HR staff.
- Created a draft interviewer training in December 2023 for those Park District employees who are eligible to interview job applicants; OIG will work with the Park District's HR Department in the first quarter of 2024 to finalize the training, roll it out District-wide, and then verify that the appropriate Park District employees have completed the training in compliance with the Employment Plan.
- Issued three hiring compliance reports related to the Park District's compliance with the Employment Plan (those reports are summarized on page 9 of this report).

Going forward, one of the OIG's main projects in this area will involve working with the Park District's HR department to update the Park District Employment Plan, which has not been revised since 2014, in order to eliminate outdated language and adopt, where appropriate, language from the more recently revised City of Chicago and Cook County Employment Plans.

On a more structural level, the OIG recently proposed two amendments to the Park District Code. The first amendment would allow the OIG to issue summary reports that name the investigated party without first obtaining Board President approval. The second would require Park District Management to respond to OIG's summary reports within 30 days. These amendments are intended to further establish the OIG's independence and incorporate operational best practices and will be presented to the Park District Board in the first quarter of 2024 (these proposed amendments are described in greater detail on page 14 of this report).

Finally, in terms of staffing, in 2024, the OIG will be seeking to permanently fill its Deputy Inspector General position, and also hire two Investigators, an auditor, and an Assistant Hiring Compliance Officer, with the majority of those hires to occur in the first quarter of 2024. Once fully staffed, I strongly believe that the OIG will be better positioned than ever to carry out its watchdog role.

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

Sincerely,

Peter Neumer
Inspector General
Chicago Park District Office of the Inspector General

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Office Overview

Mission

Pursuant to the Chicago Park District Code, the OIG is responsible for:

- Investigating allegations of fraud, waste, and abuse or misconduct by Chicago Park District employees, members of the Board of Commissioners, contractors, agents, and volunteers.
- Conducting District-wide internal audits to assess the integrity of financial reporting systems, the effectiveness of internal controls, and the efficiency of established procedures.
- Monitoring the Park District's compliance with the Employment Plan's rules governing hiring and other employment actions.

Budget

In FY 2023, the OIG's adopted combined budget was \$954,719. In FY 2024, the OIG's budget is \$1,008,565.

Personnel

In the fourth quarter of 2023, the OIG was staffed as follows: an Inspector General, Interim Deputy Inspector General, Director of Audit, one full-time auditor, one part-time investigator, two contractual investigators, one contractual hiring compliance consultant, and an administrative assistant. The OIG is in the process of hiring a Deputy Inspector General, two full-time investigators and an additional full-time auditor. The OIG also receives regular support from law enforcement personnel.

Reporting Fraud, Waste, and Abuse

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

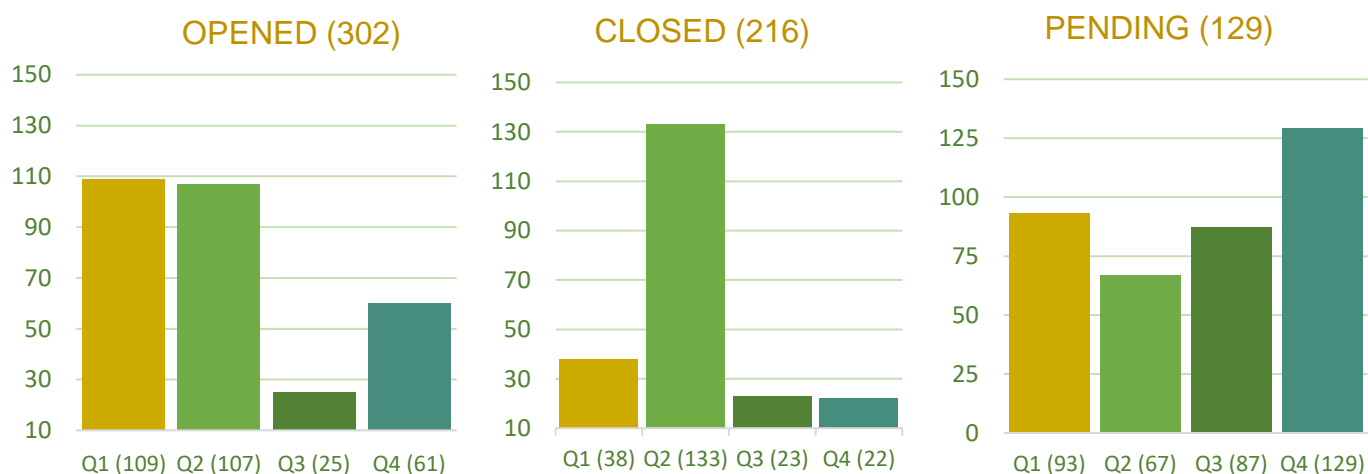
- Online: [Click here to submit online complaint](https://chicagoparkdistrict.i-sight.com/external/case/new) or visit: <https://chicagoparkdistrict.i-sight.com/external/case/new>
- By telephone: (312) 742-3333 (Confidential Hotline)
- In writing:
Chicago Park District Office of Inspector General
740 North Sedgwick Street Suite #300
Chicago, IL 60654
- By fax: (312) 742-9505

FY23 INVESTIGATIVE METRICS

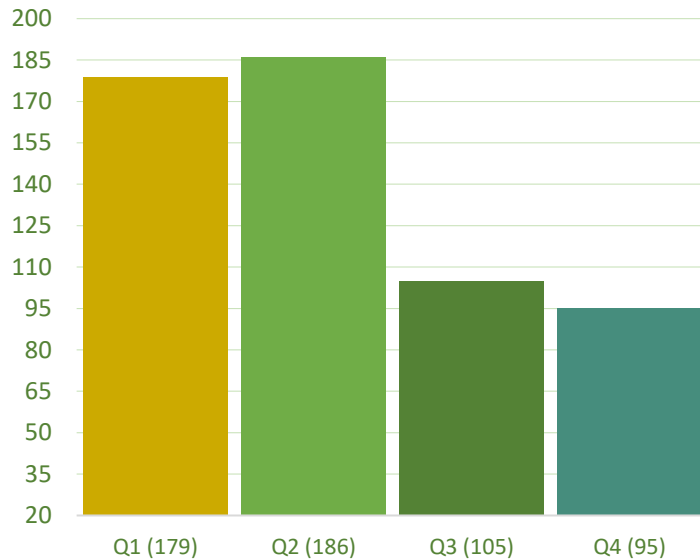
In the 2023 fiscal year (FY23), the OIG received 565 complaints, opened 302 investigations and closed 216 investigations (see below charts). Of the 302 investigations the OIG opened in FY23, 251 of them involved potential criminal misconduct or fraud, 41 involved other rule, code or ordinance violations, and 10 of them involved waste, inefficiency or policy compliance. With respect to the focus of OIG's investigations and reviews, 297 concerned the conduct of employees, 1 concerned the conduct of officers, and 7 concerned "other" parties (i.e., patrons, agents, concessionaires, contractors, partners or unknown parties).

As the OIG's FY23 quarterly reports have reflected, the majority of the OIG's completed investigations in 2023 involved Paycheck Protection Program (PPP) loan fraud. In addition, the vast majority of the OIG's 129 pending investigations involve PPP fraud. The OIG expects that in 2024, as the office continues to complete PPP investigations, the number of pending investigations will decrease, as will the percentage of cases that are focused on PPP fraud.

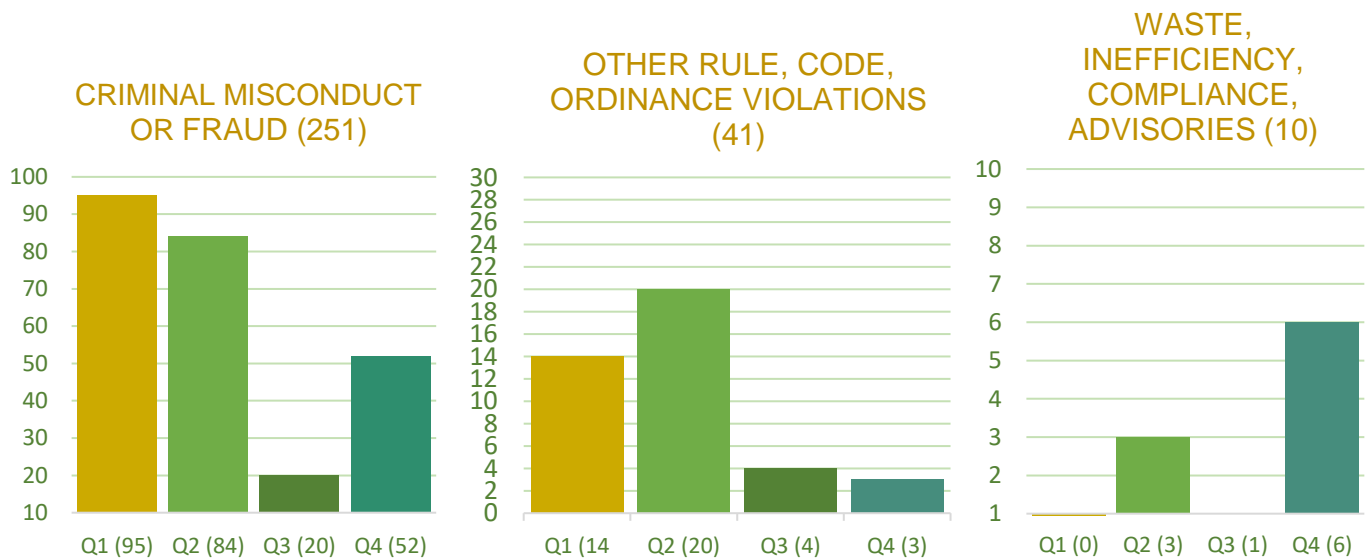
INVESTIGATIONS



COMPLAINTS RECEIVED (565)¹

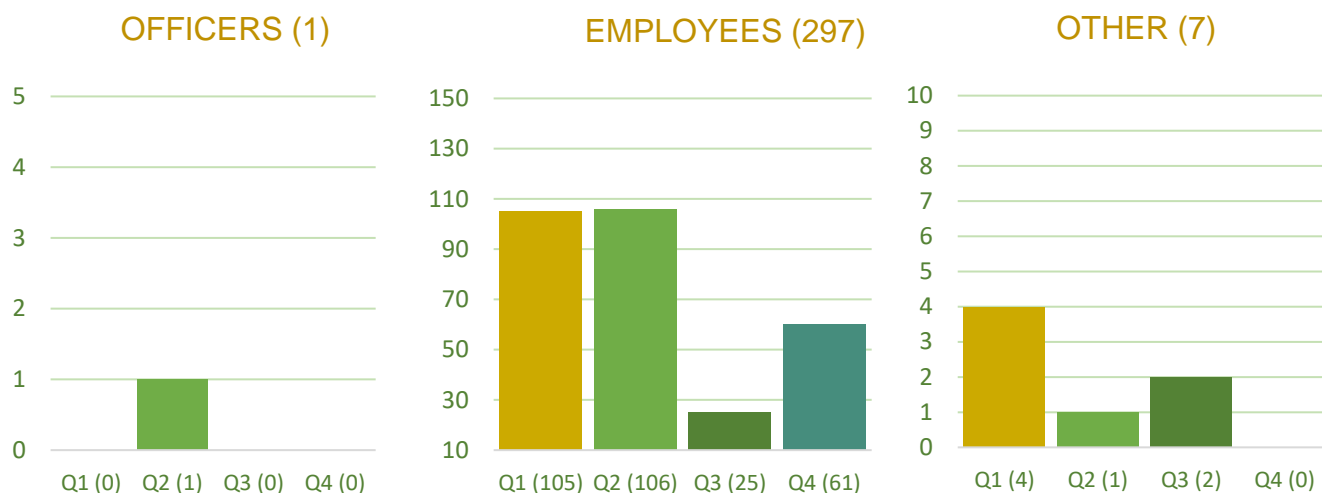


TYPES OF INVESTIGATIONS



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

INVESTIGATED AND REVIEWED PARTIES²



Quarterly Investigative Information

As the above charts reflect, OIG opened 61 investigations in the fourth quarter of 2023 and closed 22 investigations.

Of the 61 investigations the OIG opened in the fourth quarter, 52 of them involved potential criminal misconduct or fraud, 3 involved other rule, code or ordinance violations, and 6 of them involved waste, inefficiency or compliance. With respect to those 61 investigations, all 61 concerned the conduct of employees, zero concerned the conduct of officers, and zero concerned “other” parties (i.e., patrons, agents, concessionaires, contractors, partners or unknown parties).

The OIG has 129 pending investigations, which again reflects the high number of PPP cases the office is continuing to investigate. The OIG received 95 complaints in the fourth quarter.

² The term "other" in the below chart includes patrons, agents, concessionaires, contractors, partners and unknown parties.

FY23 4th Quarter Investigative Summaries³

PPP Investigations

In the fourth quarter of 2023, the OIG's investigative efforts continued to be focused primarily on PPP loan fraud.⁴ With respect to PPP cases, the OIG completed 9 investigations in the fourth quarter that resulted in sustained findings or recommendations for personnel action. More specifically:

- In 23-0030, the OIG determined that a Park District employee fraudulently obtained a \$20,000 PPP loan. Accordingly, the OIG recommended that the employee be terminated. Management's response to OIG's report and recommendation is due on January 31, 2024;
- In 23-0542, the OIG's preliminary investigation indicated that a Park District employee received a loan via the PPP program. However, the employee resigned two days after they were served with a notice to appear for an OIG interview. Accordingly, although the OIG could not sustain a finding against the employee regarding the PPP loan because it was unable to complete its investigation, the OIG recommended that Management designate this former employee as "Do Not Rehire." The employee was subsequently designated as "Do Not Rehire."
- In 23-0268, the OIG's preliminary investigation indicated that a Park District employee received a loan via the PPP program. However, after the OIG interviewed the employee, the employee failed to comply with OIG's request for the documents that would have demonstrated that whether the employee's loan was valid. The employee retired three months after their OIG interview without providing the requested documents. Accordingly, based on their failure to cooperate with the OIG's investigation, the OIG recommended that Management designate this former employee as "Do Not Rehire." The employee was subsequently designated as "Do Not Rehire."

In the other 6 PPP cases (23-0103, 23-0199, 23-0470, 23-0509, 23-0530, 23-0533), the subject employees ended their Park District employment before the OIG was able to complete its investigations. Accordingly, the OIG was not able to definitively determine in those cases whether the employees engaged in PPP fraud. The OIG therefore issued reports recommending that Management flag those former employees for review so that in the event they apply for re-employment, the Park District's Human Resources department can notify the OIG. The OIG will then re-open its investigation and make a final determination as to whether the person engaged in fraud.

³ Summaries of OIG's FY23 Q1, Q2 and Q3 investigative reports are available here: [Office of the Inspector General | Chicago Park District](#).

⁴ As noted in OIG's second quarter report for 2023, "In late 2022, the OIG received an anonymous complaint on the Hotline that some employees had wrongfully applied for and received loans in 2020 and 2021 under the U.S. government's Paycheck Protection Program (PPP). During the pandemic, the PPP program was established to provide small businesses with financial resources to maintain their payroll, hire back employees who may have been laid off, and cover applicable overhead."

In four of the cases, Management subsequently placed the former employee in “review” status; in two of the cases (23-0509 and 23-0470) the employee was designated “Do Not Rehire.”⁵

The below chart sets forth a more comprehensive accounting of the OIG’s completed PPP investigations in 2023 and management’s responses to the OIG’s findings and recommendations.

RESULTS OF THE OIG’S PPP INVESTIGATIONS IN 2023

	SUSTAINED FINDINGS	OIG RECOMMENDATIONS	MANAGEMENT RESPONSES	NOTES
Employees Who Admitted That They Did Not Own the Businesses Claimed in Their Loan Applications	6	Termination	Terminations: 6 Pending: 0	Employees who resigned or retired during the pendency of the disciplinary hearing are designated as “Do Not Rehire.”
Employees Who Admitted Receiving Loans but Failed to Cooperate With the OIG/Did Not Validate Ownership of the Claimed Business	18	Termination	Terminations: 14 Pending: 0 Resigned: 4	Employees who resigned or retired during the pendency of the disciplinary hearing are designated as “Do Not Rehire.”
Employees Who Refused to Cooperate with the OIG	5	Termination	Terminations: 0 Resignations or Retirements: 5 Pending: 0	Employees who resigned or retired during the pendency of the investigation or their disciplinary hearings are designated as “Do Not Rehire.”
Seasonal (Former) Employees Who Refused to Cooperate with the OIG/Did Not Validate Ownership of Claimed Business	38	Do Not Rehire	Do Not Rehire: 38 Pending: 0	
Seasonal (Former) Employees Who Did Not Respond/OIG Unable to Contact	51	Designate as “Review”	Designated as Review: 49 Do Not Rehire: 2	Designating a former seasonal employee as “review” means that if the person applies for re-employment, the applicant is referred to the OIG so it can complete its investigation.

⁵ The Park District explained with respect to 23-0470 that the employee did not have a Taleo application on file that could be marked for review. Accordingly, HR marked the employee “Do Not Rehire” so if the employee ever does apply in Taleo, HR would see the notation in the system and inform the employee to notify OIG for further investigation.

	SUSTAINED FINDINGS	OIG RECOMMENDATIONS	MANAGEMENT RESPONSES	NOTES
Employees With Valid Loans but No Secondary Employment Approval on File	8	Appropriate Disciplinary Action	Reprimands: 7 Pending: 1	These employees were also required to obtain approval for secondary employment.
Employees Who Denied Knowledge of Applying and Receiving a PPP Loan	1	Terminate	Pending: 1	Subpoenaed loan documents reflect the subject received a PPP loan.

Other Investigations

The OIG also made a recommendation in the following non-PPP related investigation that it closed in the fourth quarter:

23-0461 – Park District Pool Staff Failed to Consistently Enforce Pool Rules

In 23-0461, the OIG investigated an allegation that an Attendant was rude and aggressive when interacting with a patron at a Park District pool. Although the OIG was unable to establish by a preponderance of the evidence that the Attendant acted unprofessionally, the evidence reflected that two Lifeguards at the pool failed to consistently enforce the pool rules that day, as an adult patron without a child was let into the pool, even though it was family swim hour. Accordingly, the OIG recommended that the Aquatics Department take action sufficient to ensure that pool staff were appropriately and consistently enforcing pool rules.

Management's response to OIG's report noted that the incident occurred during a heat emergency, which emergencies trigger changes to posted pool schedules because they create a need to have a less restrictive pool schedule. The response further noted that the Aquatics unit would be making the following changes to its policies: (1) Allowing the park supervisor or natatorium instructor to adjust the pool schedule to meet the needs of patrons at the pool attempting to swim (i.e., changes due to heat emergencies); (2) Providing staff with the delegation of authority for decisions regarding the pool, in the absence of the park supervisor.

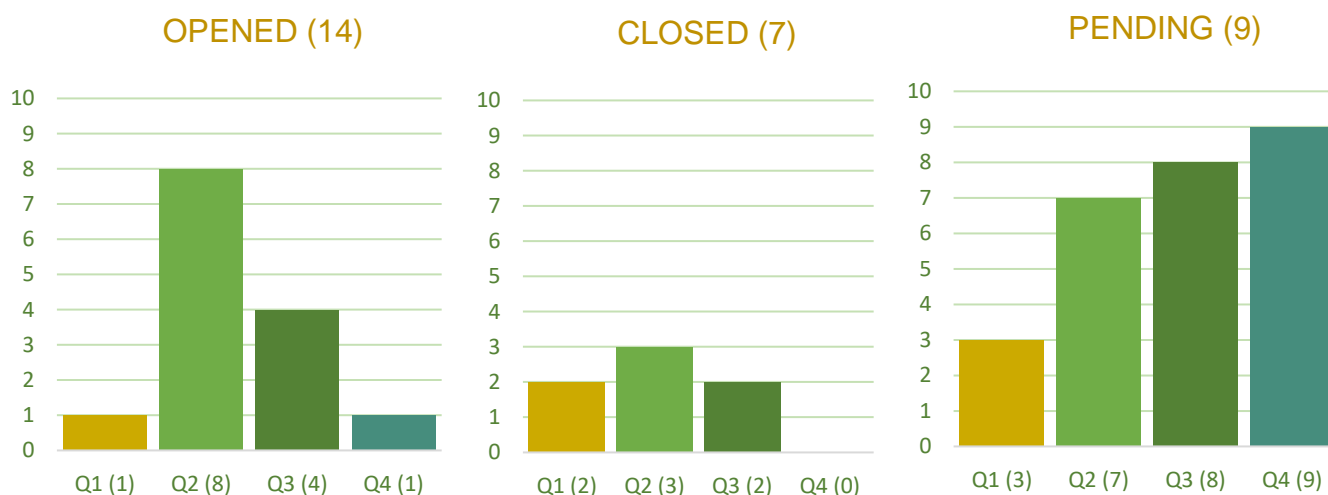
According to the response, the breakdown in the pool guidelines occurred in this incident because one staff followed the posted pool schedule while another staff was following the revised pool schedule, due to the heat emergency. Going forward, the park supervisor will have the authority to make decisions regarding changes to the posted pool schedule and all staff shall follow their directive. In the absence of the park supervisor, the natatorium instructor will have the authority.

Finally, the response stated that the Community Recreation department will communicate and train all staff on the revised pool guidelines for the upcoming year.

FY23 and Quarterly Audit and Review Metrics

In 2023, the OIG's Audit Department opened 14 audits or reviews, completed seven audits or reviews and has nine pending audits or reviews (see below charts). Summaries of these audits and reviews can be found in OIG's FY23 Q1, Q2 and Q3 reports, which are available here: [Office of the Inspector General | Chicago Park District](#). The OIG opened 1 audit in the fourth quarter of 2023 and did not close any audits or reviews. The OIG has 9 pending audits or reviews.

AUDITS AND REVIEWS



Hiring Compliance Activity

Pursuant to the Park District Employment Plan, the OIG, in its capacity as Compliance Monitor, is responsible for reviewing and monitoring the Park District's hiring and assignment actions to ensure that they comply with the Plan. The OIG reports on its compliance-monitoring activities in each of its quarterly reports.

Hiring Compliance Report Summaries

In the fourth quarter of 2023, the OIG issued three hiring compliance reports: 23-0576, 23-0597, and 23-0600.⁶

- In 23-0576, the OIG found that the Park District was not in compliance with all aspects of the Park District Employment Plan concerning the maintenance of the Senior Manager list. More specifically, the Park District is required to maintain a list of all the Senior Manager positions within the Park District, which are positions that manage three or more subordinates, are at-will and are not Shakman Exempt, among other attributes. However, the OIG determined that the most recent version of the Senior Manager list was not up-to-date and was not posted on the Park District's website, as required by the Employment Plan. Accordingly, the OIG recommended that the Park District's Human Resources department take appropriate steps to (1) create a comprehensive, up-to-date Senior Manager list, and then (2) post that Senior Manager list on the Park District's website.

The Park District's response to the OIG's report stated as follows:

"The OIG recently requested a copy of the Senior Manager list from the Human Resources Department ("HR") and also noted that there is no Senior Manager list currently on the District website. HR provided a list containing six titles and names of employees in those titles, including names of two individuals who no longer work for the District. It was explained to the OIG that the list provided was the only document able to be found in HR records identified as a Senior Manager list. In addition, those same six titles correctly appear on the current Exempt list. HR has confirmed that it has not exercised the Senior Manager exception provision for any hiring in the past two years. To our knowledge there is no record of the Senior Manager exception being used at any time after the list produced for the OIG was created. As such, rather than being a failure to maintain and post a Senior Manager list, it is more accurate to say that since all recent hiring has been done according to either the general hiring process or other exceptions enumerated in the Plan there is no Senior Manager list to post. It does not appear to be the intention of the Plan that some titles appear simultaneously on both the Exempt list and a Senior Manager list. Nor does the Plan seem to require posting of a list that is not complete or current as is the case with the most recent list HR was able to

⁶ OIG did not issue any other hiring compliance reports in 2023.

locate. With no current Senior Manager list existing and given that the titles listed on an old list are properly listed as Exempt and made public on the District's website, the transparency goals of the Plan have been met even if HR record keeping under prior department leadership was not well maintained."

The response further stated that: "Going forward while the [Employment] Plan is being reviewed and revised, HR will also work to identify positions that meet the Senior Manager criteria currently provided or as may be revised in the review process. A Senior Manager list should be created, and the prescribed Section VIII hiring process followed. This will also include posting a Senior Manager list on the District website."

The full response to the OIG's 23-0576 report can be found here: [Superintendent Letter IG Report 23-Q4-0576.pdf \(chicagoparkdistrict.com\)](https://chicagoparkdistrict.com/Superintendent-Letter-IG-Report-23-Q4-0576.pdf).

- In 23-0597, the OIG found that the Park District had not been in full compliance with the training requirements set forth in the Employment Plan. More specifically, among other responsibilities set forth in the Employment Plan, the OIG and the Park District's HR Department are to provide annual Employment Plan training for Human Resources staff and train all employees who are eligible to interview job applicants regarding the Employment Plan's requirements and prohibitions with respect to the interviewing process.

In order to meet these requirements, the OIG, in coordination with HR, created a comprehensive Employment Plan training document for HR staff and then provided a two-hour in-person training on November 29, 2023 for eighteen HR staff. In addition, the OIG noted in its report that in December 2023, OIG created a draft interviewer training for those employees who are eligible to interview job applicants and would work with HR in the first quarter of 2024 to finalize that training and ensure that all appropriate Park District employees receive the training. Finally, OIG stated that, following the planned update of the Employment Plan, it would work with HR to develop any additional necessary trainings in a timely manner.

OIG did not make any specific recommendations for Park District management in the report, as the OIG and HR are taking the necessary steps to achieve full compliance with the Employment Plan's training requirements. The Park District's response to OIG's report is due on January 23, 2024.

- In 23-0600, following an internal review of its own duties and responsibilities under the Employment Plan, the OIG determined that although the OIG is generally fulfilling its role as Compliance Monitor, at the present time it is not fully carrying out all the audit and review responsibilities set forth in the Plan, including the Plan's requirement that the OIG audit on a quarterly basis the hiring sequences of 20% of all full-time hires and 5% of all seasonal hires. Notably, though, based on hiring data provided by the Park District, that requirement would mean that in some quarters the OIG would possibly have to perform as many as 100 audits,

which, given the OIG's other hiring compliance duties, would likely not be possible for the OIG with its current resources.

The OIG's report further notes that the OIG examined the City of Chicago and Cook County Employment Plans and determined that those plans do not have similar audit or review quotas like the Park District Employment Plan; rather those plans give the Compliance Monitors the authority to utilize their resources in the manner that they determine to be most efficient and effective. Accordingly, as HR and OIG work to update the Park District Employment Plan, which has not been revised since 2014, the OIG will seek to amend the Plan to reflect the language of the City and County Employment Plans. However, if the audit and review quotas remain in effect, the OIG may seek additional personnel resources, as the OIG has determined that its present staffing would likely not allow the office to reasonably and competently carry out all the current Employment Plan's mandates.

The OIG did not make any specific recommendations for Park District management in the report, as the OIG is taking appropriate steps to ensure it is effectively overseeing compliance with the Employment Plan. The Park District's response to the report is due January 24, 2023.

Employment Plan Trainings Developed and Conducted by the OIG

As noted above, the OIG and HR have the responsibility to provide annual Employment Plan training for Human Resources staff and also train all employees who are eligible to interview job applicants regarding the Employment Plan's requirements and prohibitions with respect to the interviewing process.

Pursuant to this duty, the OIG took the following actions in the fourth quarter of 2023:

- Developed a comprehensive, interactive training document for HR staff that provided guidance on the requirements and prohibitions set forth in the Plan for all the various categories of hiring and posted that training in Success Center;
- Held a two-hour in-person training for eighteen HR staff, using the training document as a guide;
- Created a comprehensive, interactive training document regarding the Employment Plan's requirements and prohibitions regarding interviewing, as well as the Employment Plan's definitions of "Political Reasons or Factors," "Unlawful Political Contacts," and "Unlawful Political Discrimination," and provided that draft to HR for review and comment.

Review of Exempt List Modifications

The OIG is responsible for reviewing the Park District's adherence to the rules set forth in the Employment Plan pertaining to the job titles that are exempt from the Employment Plan procedures.

There were two additions to the Exempt List in the fourth quarter of 2023:

- 1 Investigator – Office of Protection and Accountability
- 1 Deputy Director of Planning - Department of Planning and Development

There were no positions removed from the Exempt list. A copy of the most recent Exempt list can be found at:

[CPD Shakman-Exempt List 23.10.12 -2-.pdf \(chicagoparkdistrict.com\)](#)

Review of Emergency Appointments

The OIG reviews circumstances and written justifications for any emergency hires made pursuant to the Personnel Rules of the Park District Code. HR reported zero emergency appointments during the fourth quarter of 2023.

Review of Exempt Management Hires

Human Resources reported four exempt hires during the fourth quarter of 2023:

- 2 Investigators - Office of Protection and Accountability
- 1 Staff Assistant to Chief
- 1 IT Manager

Monitoring Contacts by Hiring Departments

Pursuant to the Employment Plan, the OIG is to review all reported or discovered instances where hiring departments contacted Human Resources to lobby for, or advocate on behalf of, actual or potential applicants or bidders for positions that are covered by the Employment Plan, or to request that specific individuals be added to any referral or eligibility list for upcoming jobs at the Park District.

Human Resources did not report any improper contacts by hiring departments for the fourth quarter of 2023.

Review of “Acting Up” Activity

The OIG is responsible for reviewing the circumstances when an employee “acts up” (performing all or substantially all of the duties of an employee in a higher-paid classification). Activity in the fourth quarter of 2023 reflected zero instances of employees “acting up,” and 35 instances where an employee who had been in “acting up” status was placed back in their position (an “acting up reversal”).

Review of Written Rationales

The OIG is responsible for reviewing written rationales when no consensus selection was reached during a consensus meeting, meaning no one from the approved candidate pool was selected. Human Resources did not submit any “no consensus” letters during the fourth quarter of 2023.

Arbitrations and Grievances

Pursuant to the Employment Plan, the OIG is to audit arbitrations and grievances involving hiring, promotions, transfers, or allegations of unlawful political discrimination. The OIG received notification from Human Resources that one grievance was filed during the fourth quarter of 2023 involving an alleged denial of a promotion. That grievance was subsequently withdrawn. Human Resources reported that there were no arbitrations during this quarter.

Hiring Compliance Advisories

Under the Park District’s Employment Plan, the OIG, in its role as Compliance Monitor, is to participate in “the development, recommendation and implementation of necessary policy and operating changes.” See Section XI(A) of the Employment Plan. In FY23, the OIG provided 17 advisory opinions on issues that arose pertaining to implementation or interpretation of the Employment Plan.

In the fourth quarter, the HCO was consulted on four matters (23-0479, 23-0571, 23-0591, and 23-0595) and rendered advisory opinions in each of those matters.

With respect to 23-0595, where the OIG was asked to review a request for two additional positions to be added to the Exempt list, OIG approved the addition of the two positions, but also recommended that Park District management take action sufficient to ensure that, going forward, the Compliance Monitor’s approval of the addition of a position to the Exempt List is sought prior to the filling of that position. Regarding 23-0595, the position that management was seeking to have added to the Exempt List had already been filled.

Proposed Park District Code Amendments

In the fourth quarter of FY23, the OIG proposed multiple amendments to the Park District Code that are intended to further establish the OIG's independence and incorporate operational best practices. More specifically, the OIG proposed (1) allowing the OIG to issue summary reports that name the investigated party without first obtaining Board President approval; and (2) implementing a requirement that Park District Management respond to OIG's summary reports within 30 days. These proposed amendments will be presented to the Park District Board during the first quarter of 2024, which will trigger a 45-day notice and comment period. After the notice and comment period has concluded, the amendments will be presented to the Board for final approval.

Summary Report Issuance

As background with respect to the issuance of summary reports, Chapter II(D)(7) of the Park District Code currently states as follows with respect to the issuance of OIG summary reports: "Upon conclusion of an investigation or review, the Inspector General shall issue a summary report thereon which copy shall be provided to the Board President and to the General Superintendent." The Code further provides that "[t]he report shall not mention the name of any informant, complainant, witness or person investigated or reviewed, unless otherwise authorized by the Board President." Thus, under the current Park District Code, the OIG is arguably prohibited from issuing a summary report recommending the termination of a specific named Park District employee, unless the OIG obtains prior authorization from the Board President to identify the employee. Therefore, there is a tension between Chapter II(D)(7) and Chapter II(D)(3), which states that "the [Park District] Board shall not prevent, impair or prohibit the Inspector General from initiating, carrying out or completing any investigation or review."

Accordingly, the OIG proposed revising the language of Chapter II(D)(7) as follows:

Upon conclusion of an investigation or review, the Inspector General shall issue a summary report thereon which copy shall be provided to the Board President and to the General Superintendent. The Inspector General may redact (a) the personal identifying information of any informant, complainant, witness or person investigated or (b) other information, if such personal or other information may reveal or undermine an ongoing investigation or is not essential to the report's findings.

Timeline for Responses to the OIG's Reports

At the present time there is no language in Chapter 2 of the Park District Code requiring a timely response to OIG's investigative reports, unless they are related to hiring compliance. In practice, the OIG generally provides Park District Management 30 days to respond to the recommendations contained in its summary reports and Management often provides its response within that timeframe. However, the provision of such a response is not statutorily mandated.

To fill this gap, the OIG proposed adding the following language to Chapter II(D)(7) of the Park District Code:

If the inspector general issues a recommendation for discipline or other administrative action in a summary report, the General Superintendent or their designee must respond to that recommendation within 30 days with a written response to the inspector general. This response must include either (1) a description of any disciplinary or administrative action the General Superintendent has taken with respect to the employee in question or (2) a request for a 30-day extension of the 30-day decision period if additional time is needed by the General Superintendent to review the recommendation. If the General Superintendent did not take any disciplinary or administrative action, or took a different disciplinary or administrative action than that recommended by the inspector general, the General Superintendent must describe the different action and explain the reasons for the different action in the written response. This response must be submitted to the inspector general within the 30-day decision period. The inspector general may approve a request for an extension of this 30-day decision period for a period of time not to exceed 30 days if additional time is needed by the General Superintendent to review the recommendation of discipline.

Matters Pending Over Six Months

The Chicago Park District Code provides that the OIG's quarterly reports "shall identify any investigation, audit or review which has not been completed within six months, and shall state the reasons for failure to complete the investigation, audit or review within six months." 64 pending matters, as well as the reasons for their continuing pending status, are set forth in the below chart.

As the chart makes readily apparent, the OIG is continuing to work through a substantial amount of PPP fraud investigations. Those high caseloads have impacted the timeliness of the OIG's case completion, leading to an increase in the number of cases that have been open over six months. The OIG expects to see a significant reduction in these numbers by the end of 2024.

Case Number	Matter Type	Nature of Allegation	Reason
22-0191	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
22-0287	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0040	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0055	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0063	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0068	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0070	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0075	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0080	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0097	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0100	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.

23-0105	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0126	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0135	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0136	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0139	Investigation	Hiring Compliance	Complex investigation – multiple allegations
23-0174	Investigation	Criminal Conduct	Complex investigation – involves multiple allegations of theft
23-0193	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0195	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0201	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0206	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0216	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0217	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0218	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0219	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0248	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0249	Investigation	Hiring Compliance	Complex investigation – multiple allegations

23-0251	Investigation	Residency	Resource intensive investigation.
23-0252	Investigation	Residency	Resource intensive investigation.
23-0253	Investigation	Residency	Resource intensive investigation.
23-0254	Investigation	Residency	Resource intensive investigation.
23-0256	Investigation	Time falsification	Resource intensive investigation.
23-0264	Investigation	Residency	Resource intensive investigation.
23-0270	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0274	Investigation	Hiring Compliance	Multiple allegations.
23-0275	Investigation	Residency	Resource intensive investigation.
23-0276	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0282	Investigation	Administrative Violations	Complex investigation – significant documents and several interviews required.
23-0299	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0300	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0304	Audit	N/A	The objectives and scope have materially altered from the beginning of the project.
23-0313	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0315	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.

23-0316	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0317	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0318	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0319	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0336	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0338	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0339	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0341	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0345	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0346	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0347	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0350	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0351	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0352	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0353	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.

23-0355	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0357	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0358	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0359	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0360	Investigation	PPP Loan Fraud	Complex investigation – requires the acquisition and analysis of financial records.
23-0382	Investigation	Administrative Violation	High caseload.

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