

# CHICAGO PARK DISTRICT OFFICE OF INSPECTOR GENERAL

ALISON R. PERONA, INTERIM INSPECTOR GENERAL



OIG FOURTH QUARTER REPORT 2022  
AND ANNUAL STATISTICS





Alison R. Perona  
Interim Inspector General

## CHICAGO PARK DISTRICT OFFICE OF INSPECTOR GENERAL

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### Annual 2022 Report

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

I respectfully present the Office of Inspector General's 2022 Fourth Quarter/Annual Report. The summaries in this report present an overview of the investigative, audit, and hiring compliance monitoring activities performed during the Fourth Quarter, along with statistical information for the year.

In 2022, the Park District experienced some dramatic changes: a surge in hiring and an increase in programming due to the lifting of pandemic restrictions plus the implementation of reforms in the wake of the Aquatics scandal. The OIG monitored these changes and supported the efforts via targeted investigations and reviews, and through consulting activities. Working independently and, where appropriate, in partnership with Park District leadership, OIG staff identified control and compliance deficiencies and instances of misconduct. Management agreed with the OIG's recommendations and took disciplinary action and/or adopted procedural reforms.

The OIG's on-going efforts enabled Management to conduct detailed examinations of the situations leading to the deficiencies and non-compliances, resulting in the implementation of new or enhanced controls. Partly in response to the OIG's 2021 and 2022 investigations of the Aquatics Department, one of the notable accomplishments was the establishment of the Office of Prevention and Accountability (OPA). OPA is tasked with investigating allegations of violations of the Park District's Human Rights Ordinance. The OIG is working with OPA, Law, and the Human Resources Departments in establishing protocols and ensuring operational efficiencies for these investigations.

The OIG's internal processes were enhanced in late 2022 with the addition of two staff members: an Interim Deputy Inspector General and an Administrative Assistant. The Interim Deputy Inspector General's expertise in administration and investigations has enabled staff to make better use of time and resources—resulting in greater productivity. The new Administrative Assistant filled a vacancy that had existed for a number of years. The Assistant is updating office procedures and is coordinating systems to ensure a more efficient working environment.

The Investigations Division completed 68 investigations in 2022. In addition to these activities, OIG investigators provided assistance to numerous Park District departments, as well as to several external agencies. The 2023 budget provides funding for the addition of two full-time investigators. It is anticipated that these positions will be filled by the second quarter.

Audit production did not meet the previous years' output due to the departure of two members of the Audit team. OIG investigators assisted Audit in conducting field work—thus allowing audit activity to continue uninterrupted. The Park District has hired a new Director of Audit who will assume duties in January. Once the new Director is in place, the OIG will move forward to fill the staff vacancy. The new Director will also work with the Audit Committee to establish an audit plan for 2023.

The increase in the OIG's hiring compliance oversight reviews and advisory opinions mirrors the rise in hiring and promotional activity. In order to ensure the integrity of the process, the OIG/Hiring Compliance Monitor is performing a review of the Park District's adherence to the procedures set forth in the Employment Plan.

In addition to the activities described above, the OIG has been engaged in a robust outreach program to establish presence and awareness in facilities and neighborhoods. The OIG developed a new informational poster—with the goal to have it displayed in 100% of the District's facilities. (See last page of this report.) The OIG plans on participating in additional training and outreach activities throughout 2023.

One of the OIG's stated goals in 2022 was to restore confidence in the integrity of the Park District and in the Office of Inspector General. Through its broad-spectrum activities, the OIG has been a vital contributor to this effort.

The OIG will continue its commitment to the District and to the citizens of Chicago to ensure the utmost integrity and effectiveness in Park District operations.

Sincerely,

*Alison R. Perona*

Alison R. Perona  
Interim Inspector General

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# Office Overview

## Mission

Pursuant to Chapter 2, Section D of the Chicago Park District Code, the OIG is charged with:

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

While working to fulfill its legal mandate, the OIG partners with law-enforcement agencies, when appropriate, to ensure that serious criminal misconduct that is uncovered during the OIG's administrative investigations is investigated and prosecuted.

## Budget

In FY 2022, the OIG's adopted budget was \$899,421.

In FY 2023, the OIG's adopted combined budget is \$954,719.

## Personnel

As of December 31, 2022, the OIG was staffed as follows: an Interim Inspector General, an Interim Deputy Inspector General, Assistant Compliance Officer, one full-time Auditor, one part-time investigator, two part-time contractual investigators, and an Administrative Assistant. The OIG also receives regular support from law enforcement personnel.

The OIG anticipates filling the following budgeted vacant staff positions in the first quarter of 2023: Director of Audit, Auditor, and General Investigator (2 positions).

## Training and Investigation Standards

Each employee of the OIG is a member of the Association of Inspectors General (AIG), a national organization of state, local, and federal Inspectors General and their staff. Participation in the AIG offers employees continuing training in best practices related to the performance of the Inspector General Mission. The AIG collaborates with Inspector General offices from other state and local agencies to train all staff in a variety of areas related to investigations and audits. The OIG conducts its investigations in accordance with the AIG's Principles and Standards for Offices of Inspector General.

The OIG also abides by generally accepted principles, quality standards, and best practices applicable to federal, state, and local offices of Inspectors General. In addition, the OIG, at all times, exercises due professional care and independent, impartial judgment when conducting its investigations and issuing its reports and recommendations.

## Report Abuse, Fraud, and Waste

Submit a report to the OIG through one of the following options:

- 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 Avenue  
Suite #300  
Chicago, IL 60654
- By fax: (312) 742-5841

# INVESTIGATIONS

In 2022, the OIG investigated and reported findings on a total of 68 cases of suspected misconduct, fraud, waste or abuse. Many of these reports stemmed from allegations of misconduct, bullying and harassment in the Aquatics Department. Detailed information about the nature of the 2022 investigations can be found at the end of this report.

Information pertaining to investigations closed and reported in the Fourth Quarter follows below. Summaries pertaining to investigations previously reported this year can be found in the 2022 quarterly reports.

## FOURTH QUARTER INVESTIGATIONS

### AN EMPLOYEE CLAIMED THAT SHE HAD BEEN DENIED PROMOTIONS AFTER FILING A SEXUAL HARASSMENT CLAIM

An employee reported to the OIG that she had filed a sexual harassment claim against her supervisor in 2018 and had been denied promotions since that time.

The OIG verified that Management investigated and handled the 2018 claim. Park District records indicated that the complainant sought promotion only once since filing the claim. Records from this promotion sequence indicate that the position was given to a more qualified candidate. The complainant acknowledged that she only sought promotion once (in 2018) since she filed the sexual harassment claim.

The OIG determined that the allegation was not sustained.



## AN EMPLOYEE OPERATED A PARK DISTRICT VEHICLE WITH IMPROPER EQUIPMENT

The Chicago Police Department reported to the OIG that a resident complained that a Park District vehicle was being operated with the resident's personal license plate on the front bumper. The resident had previously reported the plate as stolen. The resident later received a speeding ticket showing his vanity plate on a marked Park District vehicle.

Using the photos associated with the speeding ticket, the OIG determined that the Park District vehicle was currently out of service. It had been involved in an accident where it was struck in an intersection approximately three weeks after the speeding ticket was issued. At the time of the accident, the resident's license plate was still on the vehicle. Although the damaged vehicle was still at the service center, the license plate was no longer with the vehicle.

The OIG interviewed the employee who operated the vehicle on both dates. He stated that the license plate had been found in a Park District service yard and stated that he put the plate on the car "as a joke."

The OIG determined that the allegation was sustained and recommended that Management take appropriate disciplinary action. The OIG also recommended that Management ensure that the employee pay the speeding ticket.

The employee has paid the speeding ticket. A disciplinary hearing has been scheduled. Management has sent a memo to employees restating the policy against affixing any non-authorized tag, sticker, etc. to Park District vehicles.

## A SUPERVISOR REPORTED A SUSPECTED FALSIFICATION OF A PERSONNEL RECORD

A supervisor contacted the OIG and reported that she believed that someone had created and submitted a personnel status change request using her name as the requesting party. She provided the OIG with a record showing that she had submitted a request to change a supervisee's status—a request which was denied. She also supplied the OIG with a second personnel status change request for the same individual that was dated three weeks after the one she submitted. This request had been approved. The supervisor's name was listed as the requestor on the second document. The supervisor firmly denied creating or having knowledge of the second request.

Working with the Human Resources (HR) and Information Technology (IT) Departments, it was discovered that the software application used by the Park District to process personnel requests has a default setting that automatically changes the name in "requestor" field each time a file is opened. In this case, the second personnel change request had been initiated by an HR manager after the settlement of a grievance. When the complainant logged into the application and opened the file, the application automatically populated her name into the requestor field.

While the allegation of falsification of documents was not sustained, the OIG recommended that IT research the issue and devise a solution to ensure an accurate history/audit trail in order to ensure the integrity of operations and to avoid the appearance of impropriety.

IT has reconfigured the view in the display field so that it now permanently reflects the name of the party who initiated the request.

## A SUPERVISOR REPORTED AN ALLEGATION OF SUSPECTED SEXUAL MISCONDUCT

A supervisor reported to the HR Department that a female employee confided to her that, as a minor, the employee had engaged in a sexual relationship with a male employee. HR notified the OIG and requested an investigation.

The OIG investigation determined that the male employee began working for the Park District when he was 19 years old. The alleged victim met the male employee while she was participating in Park District programming. She was 17 years old at the time. The male employee was not acting in a supervisory capacity during the event. Both employees agreed that the female employee approached the male employee and engaged him in conversation. They met up later at a private party and subsequently started dating. There were no allegations of threats, force or coercion.

The age of consent in Illinois is 17 unless the alleged perpetrator is over the age of 17 and is in a position of trust, authority, or supervision in relation to the victim. There is no evidence that the male employee had this position in relation to the alleged victim. Birth records confirm that both parties were of the age of consent when they began the sexual relationship.

The OIG deemed the allegation as not sustained.



## AUDITS AND REVIEWS

In 2022, the Audit Division of the Office of Inspector General completed three audits. Summaries of these reviews can be found in the OIG's First and Second Quarter Reports.

The Director of Audit and one staff Auditor left the employ of the Park District in the last half of 2022. Their departure severely impacted the Audit Division's resources. OIG investigative staff have assisted Audit with field work to ensure that oversight of Park District activities continues.

The Park District has selected a new Director of Audit who will assume the role in January 2023. Once the new Director is in place, the OIG will take steps to fill the vacant Audit staff position.

Annual statistics regarding audit activity can be found on page 16.

# HIRING COMPLIANCE

Pursuant to a court order releasing the Park District from federal oversight of hiring practices (the Shakman decree), the OIG reviews and monitors the Park District's hiring and assignment determinations throughout the year. The Park District's Employment Plan, which was approved by the federal court, delineates specific monitoring activities and gives the OIG authority to review these processes. The compliance monitoring activity for the Fourth Quarter is summarized below. Information on prior activity can be found in the OIG's Quarterly Reports. Annual statistics are located on page 16.

## Monitoring Contacts by Hiring Departments

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

HR did not report any improper contacts by hiring departments in 2022. To date, HR has not reported any improper contacts by hiring departments.

## Review of Exempt List Modifications

The OIG reviews the Park District's adherence to exemption requirements and modifications to the list of job titles and number of positions that are exempt from the Employment Plan procedures. There were no exempt positions added to or removed from the Exempt List in the Fourth Quarter.

## Review of Exempt Management Hires

Human Resources reported two exempt hires during the Fourth Quarter of 2022: Director of the Office of Protection and Accountability and Human Resources Manager.

## Review of Written Rationales

The OIG reviews written rationales where no selection (no one from the approved candidate pool was selected) was reached during a consensus meeting. HR did not submit any “no consensus” letters during the Fourth Quarter of 2022. The last “no consensus” letter that the OIG received was in 2015, when the Park District was still under the federal Shakman Decree.

## 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 no emergency appointments during the Fourth Quarter of 2022. To date, no emergency appointments have been reported.

## Arbitrations and Grievances

The OIG receives notices of all arbitrations and grievances involving hiring, promotions, transfers, or allegations of unlawful political discrimination. During the Fourth Quarter, OIG learned that there were two arbitrations and five grievances.

## Review of “Acting Up” Activity

The OIG receives notice and reviews documentation pertaining to each circumstance 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 2022 showed that, on one instance, an employee had “acted up,” and 34 instances where employees who had been in “acting up” status were placed back in their positions or promoted.



## Hiring Sequence Audits

The OIG audited a sample of Park District hires in the Fourth Quarter of 2022 for compliance with the Employment Plan.

In the Fourth Quarter, the following hiring sequences were audited:

- |          |   |
|----------|---|
| #2200702 | Senior Counsel                                |
|          | ◦ Applicants: 8                               |
|          | ◦ Qualified candidates: 8                     |
|          | ◦ Candidates interviewed: 6                   |
| <br>     |   |
| #2100534 | Physical Instructor*                          |
|          | ◦ Applicants: 22                              |
|          | ◦ Qualified candidates: unknown               |
|          | ◦ Candidates interviewed: 7                   |
| <br>     |   |
| #2200718 | Aircraft Instructor                           |
|          | ◦ Applicants: 4                               |
|          | ◦ Qualified candidates: 3                     |
|          | ◦ Candidates interviewed: 2                   |
| <br>     |   |
| #2200549 | Attendant*                                    |
|          | ◦ Applicants: 11                              |
|          | ◦ Qualified candidates: unknown               |
|          | ◦ Candidates interviewed: 10                  |
| <br>     |   |
| #2200129 | Seasonal Activities Instructor III (Sailing)* |
|          | ◦ Applicants: 3                               |
|          | ◦ Qualified candidates: unknown               |
|          | ◦ Candidates interviewed: 3                   |

\*The audits continue to show that the Park District's transition to a new database, along with staffing changes, has, in some cases, resulted in the unavailability of relevant hiring information. The OIG will continue to work with the Park District to improve these issues and report on the progress.

- #2200105 Lifeguard--Seasonal (Shallow Water Attendant)
- Applicants: 226
  - Qualified candidates: 24 (See note below)
  - Candidates interviewed: N/A

Note: Due to the lifeguard shortage, no interviews were conducted. The qualified candidates had to successfully attend training and obtain their lifeguard swimming certification. All qualified candidates were given an opportunity to attend training and obtain their certifications.

- #2200726 Recreation Leader
- Applicants: 278
  - Qualified candidates: 278
  - Candidates interviewed: 153
- #2200727 Attendant
- Applicants: 212
  - Qualified candidates: 212
  - Candidates interviewed: 108
- #2200392 Program and Event Coordinator
- Applicants: 26
  - Qualified candidates: 17
  - Candidates interviewed: 3
- #2200509 Project Manager
- Applicants: 22
  - Qualified candidates: 8
  - Candidates interviewed: 8

## Hiring Compliance Interview Monitoring

The OIG monitors interviews for compliance with the Employment Plan and HR protocols. During the Fourth Quarter, the OIG monitored interviews for the following positions:

- Project Manager
- Risk Manager
- Program and Event Coordinator
- Senior Program Specialist
- Physical Instructor
- Activities Instructor

No anomalies were noted.

## Hiring Compliance Advisory Opinions

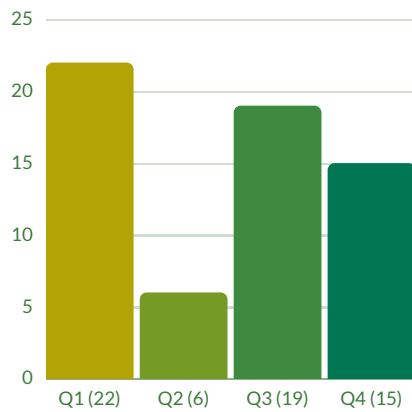
As part of the duties and responsibilities under the Park District's Employment Plan, the Hiring Compliance Officer is required to perform oversight activities of the hiring process and to participate in "the development, recommendation and implementation of necessary policy and operating changes." (See Section XI, A of the Employment Plan.) The OIG issued one hiring compliance advisory in the Fourth Quarter of 2022.



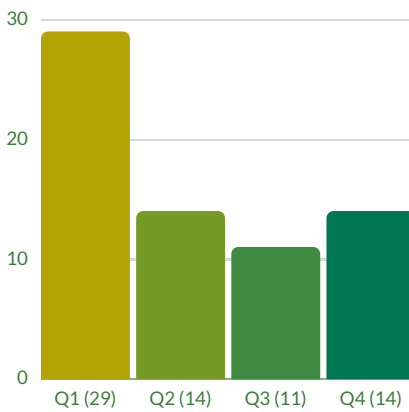
# ANNUAL STATISTICS

## INVESTIGATIONS

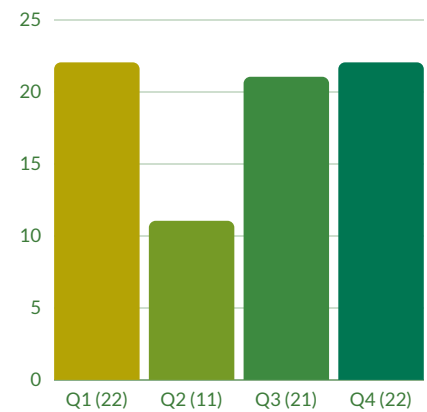
### OPENED (62)



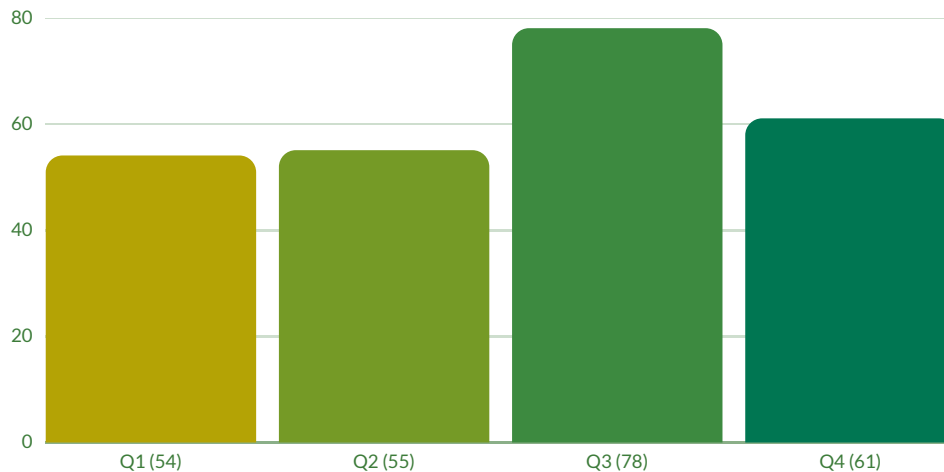
### CLOSED (68)



### PENDING (22)

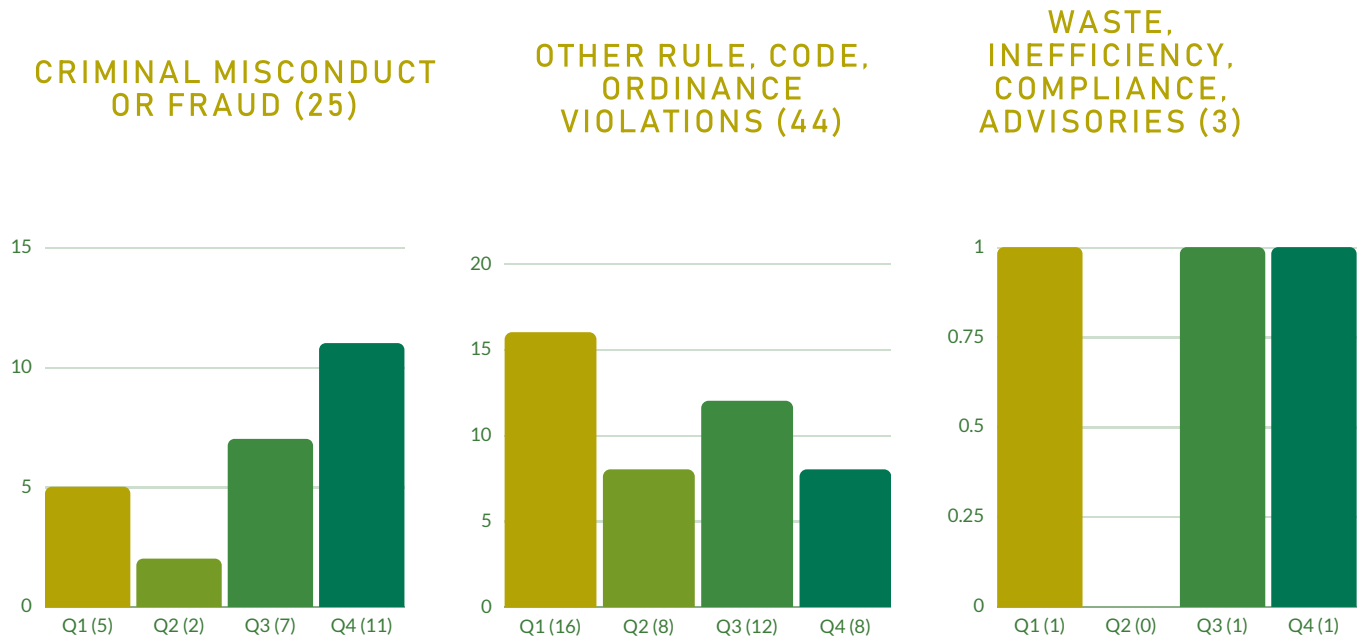


## CONTACTS/COMPLAINTS RECEIVED (248)

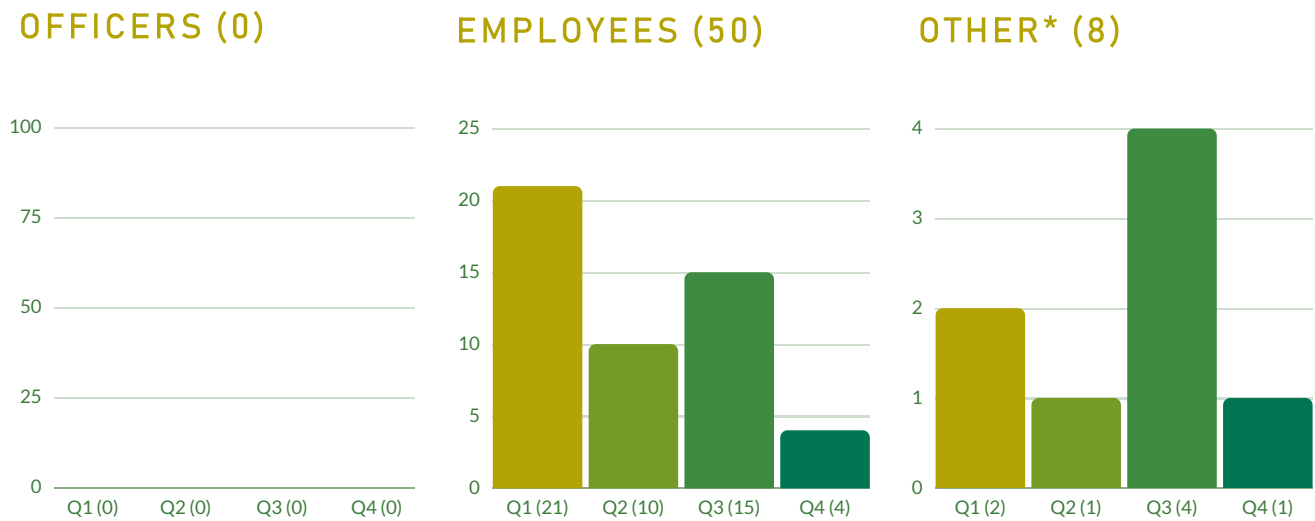


The number of contacts/complaints received includes matters that were evaluated and then referred to an internal department or external agency.

## TYPES OF INVESTIGATIONS AND REVIEWS

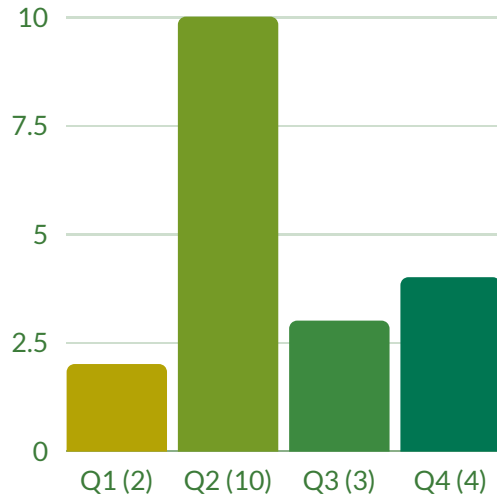


## INVESTIGATED AND REVIEWED PARTIES

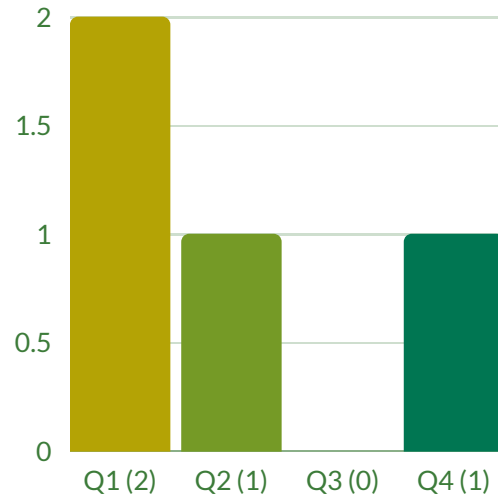


\*The term "other" includes patrons, agents, concessionaires, contractors, partners and unknown parties.

## INTERNAL ASSISTS\* (16)



## EXTERNAL ASSISTS\*\* (4)

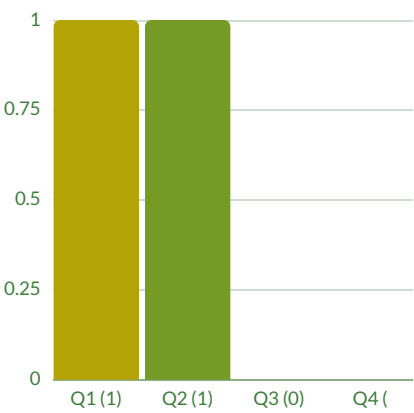


\*Internal Assists are OIG actions in response to department requests for information, analysis, or other assistance.

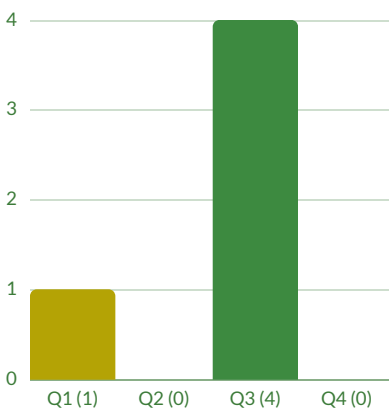
\*\*External Assists are OIG actions in response to requests from outside of the Park District (e.g., law enforcement agencies) for information, analysis, or other assistance.

# AUDITS

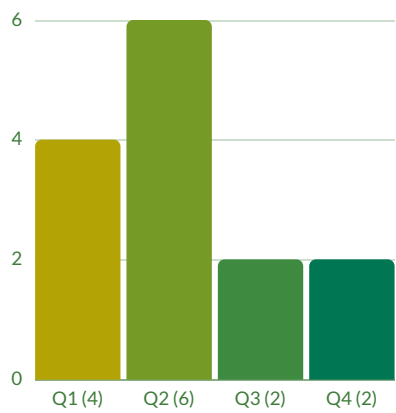
OPENED (2)



CLOSED (5)

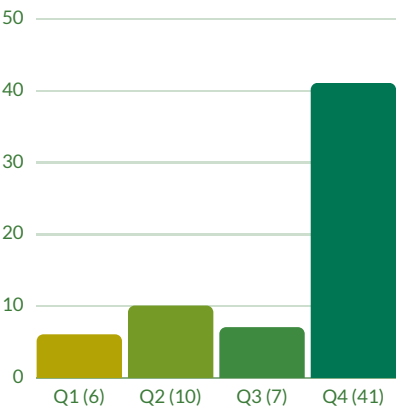


PENDING (2)

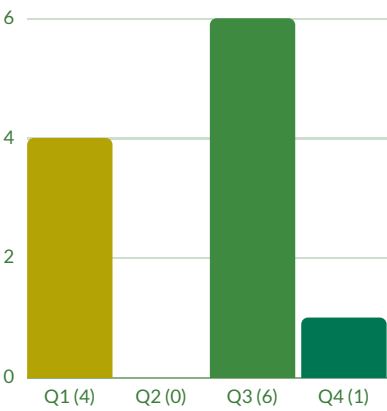


# HIRING COMPLIANCE

AUDITS & REVIEWS (64)



ADVISORY OPINIONS (11)



## MATTERS PENDING OVER SIX MONTHS

Chapter 2, Subsection D(9) of the Chicago Park District Code states 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." Those two pending matters, as well as the reasons for their continuing pending status, are listed below:

CASE NUMBER	MATTER TYPE	NATURE OF ALLEGATION	REASON
22Q10001	AUDIT	COMPLIANCE	AVAILABLE TIME AND RESOURCES
22Q20074	AUDIT	COMPLIANCE	AVAILABLE TIME AND RESOURCES

# HELP FIGHT

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## FRAUD. WASTE. ABUSE.

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Call the **Park District Inspector General Hotline** to report any information regarding misconduct, unlawful activity, or prohibited behavior occurring within the **Chicago Park District**.

All calls and emails are confidential.

Thank you!



Call **312.742.3333**

or email us at:

**[InspectorGeneral@chicagoparkdistrict.com](mailto:InspectorGeneral@chicagoparkdistrict.com)**



City of Chicago, Lori E. Lightfoot, Mayor  
Chicago Park District Board of Commissioners  
Rosa Escareño, General Superintendent & CEO

For more information about your Chicago Park District  
visit [www.chicagoparkdistrict.com](http://www.chicagoparkdistrict.com)  
or call 312.742.7529 or 312.747.2001 (TTY)

**STAY CONNECTED.**

