

2018 THIRD QUARTER REPORT

To the Board of Commissioners,

Please find below a summary of sustained investigations, compiled investigation/audit data and Employment Plan monitoring activity from the third quarter of 2018.

I. INVESTIGATIONS

A. OIG REVIEW OF VOLUNTEER ONBOARDING AND MANAGEMENT DEMONSTRATED MAJOR REFORM NEEDED; OVERHAUL IMMEDIATELY INITIATED

During the third quarter of 2018, OIG conducted a proactive review of the Park District's procedures for onboarding and managing adult volunteers revealed that the outdated paper-driven system was under-resourced, too slow for the needs of the parks and undermined throughout by non-compliance. Consequently, the Park District's records and current volunteer procedures were not reliable for basic organizational purposes such as tracking the number of volunteers in the parks or knowing which of them is actively volunteering.

More critically, the procedures were insufficient to ensure that all incoming adult volunteers submitted to the required background checks. The evidence indicated that many volunteers are never screened. Although hundreds of volunteer applicants are successfully fingerprinted and processed each year, OIG's sample review of eight parks indicated that an average of 30% of active volunteers had not submitted to a criminal background check. The review showed that only one Park District employee was tasked with the central management of the volunteer program.

The participation of volunteers can be the determining factor in whether a park can offer certain programs at all. The Park District's time-consuming volunteer application process of sending forms through the mail does not keep pace with the parks' need for volunteers and is a major reason why volunteers and the parks they work for bypass the procedures altogether.

OIG's review, which was prompted by the Board's request and was not the result of any incident or allegation, found that the Park District's background checks for

volunteers was also vulnerable because it only searches for criminal convictions in Illinois rather than jurisdictions nationwide. One example from OIG's review revealed that performing criminal background checks in Illinois only is insufficient for the purpose of vetting volunteer applicants: In 2017, the Park District's background search cleared an applicant who had no criminal convictions in Illinois but was convicted of misdemeanor sexual assault in another state (this person was not an active volunteer in 2018 and the supervisor of the relevant park stated that he did not work as a volunteer in 2017, either).

Further, the Park District does not currently require the various private youth sports leagues (e.g., little league associations) it partners with to run background checks on their volunteer coaches, assistants, etc. Several of the leagues reported to OIG that they perform background checks for insurance purposes and to satisfy requirements from the governing bodies of their sports/activities. However, the Park District does not as a matter of policy request or review the results of the checks and there is no consistent standard applied for what criminal misconduct disqualifies a prospective volunteer.

The Park District has an internal handbook for its volunteer program, but many of its procedures are no longer followed or were never followed. It's not clear that all of the policies would be useful, but the Park District's failure to enforce the procedures it finds necessary or remove the ones it does not undermines the handbook as an authority that must be followed.

OIG recommended that the Park District initiate a top-to-bottom evaluation of its volunteer program and enact policies that ensure the prompt and complete processing and tracking of all volunteers. OIG also recommended that the Park District invest in the appropriate resources and training to execute and audit its policies and procedures. Among other things, OIG specifically recommended that the Park District transition out of its outdated paper-driven procedures and recordkeeping and into an electronic system.

In response to OIG's recommendations, the Park District immediately initiated a thorough review of its volunteer management and procedures, consulted internal stakeholders throughout the organization about the problems with the current systems and sought out best practices from park associations nationwide. The Park District is currently working on implementing automated volunteer management, instituting more comprehensive background checks, and updating its policies and ability to track compliance.

OIG will track the progress of the Park District's reforms to its volunteer onboarding and management procedures.

B. PARK DISTRICT EMPLOYEE USED SICK TIME WHILE IN JAIL

An OIG investigation found that a physical instructor used sick time while serving a sentence for felony aggravated battery. The employee submitted forged doctor's notes to support his claims for sick time. The employee also repeatedly lied during his OIG interview.

OIG recommended the employee's termination. The Park District terminated the employee.

C. PARK DISTRICT SECURITY GUARD WORKING WITHOUT REQUIRED LAW ENFORCEMENT LICENSE

An OIG investigation found that a Park District Security Guard had recently been stripped of his state-issued law enforcement officer license. The license is a requirement of the Security Guard position.

OIG recommended discipline up to and including the Security Guard's termination. The Security Guard resigned before the Park District took action on the recommendation.

II. 2018 CASELOAD INFORMATION

Investigations by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2018 Total
Opened	18	6	13		
Closed	13	13	6		
Pending	69♦	62	69		

♦ Includes carry-over from previous quarter.

Reviews by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2018 Total
Opened	9	16	6		
Closed	1	23	2		
Pending	8♦	1	5		

♦ Includes carry-over from previous quarter.

Nature of Investigations and Reviews Initiated by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2018 Total
Criminal Misconduct or Fraud	4	0	2		
Waste, Inefficiency, Compliance	0	16	2		
Other Rule, Code, Ordinance Violations	14	6	15		

Audits by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2018 Total
Opened	2	6	2		
Closed	3	3	3		
Pending	3♦	6	5		

♦ Includes carry-over of four audits from previous quarter. Revises Fourth Quarter '17 Report that stated one audit was pending at end of 2017.

[see chart on following page]

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2018 Total
Officers	0	0	0		
Employees	17	6	12		
Other (Agents, concessionaires, contractors, other parties, unknown)	1	0	2		

Cases Pending Over Six Months

[5]

Reasons

Complex investigation. Generally involve difficult issues or multiple subjects: 3

Available Resources: 2

III. COMPLIANCE MONITORING ACTIVITY — SECOND QUARTER 2018

Under the Chicago Park District Employment Plan, OIG reviews and monitors the Park District’s hiring and assignment determinations to ensure that impermissible political factors have not played a role. OIG reports on its compliance monitoring activities in each its quarterly reports.

1. Monitoring Contacts by Hiring Departments

OIG reviews 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 third quarter of 2018.

2. Review of Exempt List Modifications

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.

The following modifications to the Exempt List were approved in the third quarter of 2018:

Positions added to the Exempt List (3)

Chief Diversity Officer (new position)

Chief of Staff to the Board of Commissioners (new position)

Deputy Chief Programming Officer (new position)

Positions removed from the Exempt List (3)

Two vacant Area Manager positions

Executive Assistant to the Board (Title, duties, and reporting structure changed to the Chief of Staff to the Board of Commissioners position).

3. Review of Exempt Management Hires

In addition to the three positions described above, Human Resources reported no Exempt hires made during the third quarter of 2018.

Concurrent with the posting of this Quarterly Report, OIG will post on its site the Exempt List.

4. Review of Written Rationales

OIG reviews written rationales when no consensus selection (no one from the approved candidate pool was selected) was reached during a consensus meeting.

Human Resources did not submit any "no consensus" letters during the third quarter of 2018.

5. Review of Emergency Appointments

OIG reviews circumstances and written justifications for any emergency hires made pursuant to the Personnel Rules of the Park District Code.

Human Resources reported no emergency appointments during the third quarter of 2018.

6. Review of “Acting Up” Activity

OIG reviews all circumstances where employees are “acting up” (performing all or substantially all of the duties of an employee in a higher-paid classification). Activity in the third quarter of 2018 showed a net decrease of 108 employees who “acted up”:

Acting Up Activity – 2018		
Position	Third Quarter	
	Acted up	Reversed
Community Recreation		
Physical Instructor (M)	1	1
Playground Supervisor	1	1
Lifeguard (H)	0	94
Natatorium Instructor (H)	0	5
Operations		
Security Supervisor	0	7
Security Guard	1	5
Laborer (Maintenance)	0	1
Natural Areas Worker	3	0
Executive Office		
Total	6	114

D. HIRING SEQUENCE AUDITS OF PREVIOUS QUARTER (Q2 2018)

OIG audited a random sample of nine Park District hires from the second quarter of 2018 for compliance with the Employment Plan.

- **Seasonal Attendant Hired with No Record of Applying for the Position:** The employee, who had worked as a Seasonal Attendant in 2017, applied for a year-round Attendant position in 2018. However, the employee was hired again as a Seasonal Attendant despite not applying for the position. It is not apparent that the employee was interviewed for the position or that Human Resources checked the employee’s personnel file from the previous season as required by the Employment Plan.

Additionally, OIG identified two areas for improvement from the sample of hiring sequences that it audited:

- **Reference Verification:** Of the three new Park District hires from the second quarter of 2018 (employees who were not current or former Park District employees), the Park District checked a job reference in one case. No references were verified in the other two cases. The Employment Plan requires Human Resources to verify at least one reference for new hires. This issue was flagged in OIG's last quarterly report which audited hiring sequences from the first quarter of 2018.
- **Internal Candidate Reviews:** In a related finding, the hiring sequence audits from the second quarter of 2018 indicated that Human Resources does not on a regular basis review (or doesn't make a record when it reviews) the personnel files of internal candidates who are selected for promotions or other jobs in the Park District. For returning employees and internal promotions, the Employment Plan requires that Human Resources check the employee's file. In the six audits in which current or former Park District employees were hired, Human Resources confirmed that the employee's personnel file was reviewed in just two cases. This issue was also flagged in OIG's last quarterly report.

The following hiring sequences from Q2 2018 were audited:

#3728 Electrician (Inside)

- Applicants: 75

#3724 Motor Truck Driver

- Applicants: 127

#3548 Laborer Maintenance

- Applicants: 272

#3850 Attendant

- Applicants: 89

#3811 Physical Instructor

- Applicants: 17

#3670 Recreation Leader

- Applicants: 35

#3868 Natural Areas Worker

- Applicants: 311

#3593 Floricultural Worker

- Applicants: 247

#3798 Attendant (Seasonal)

- Applicants: 56