

CHICAGO PARK DISTRICT
OFFICE OF INSPECTOR GENERAL

ALISON R. PERONA, INTERIM INSPECTOR GENERAL

OIG
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2021
REPORT





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Annual 2021 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 Annual/Fourth Quarter Report. The summaries in this report present an overview of the investigations, audit, and hiring compliance monitoring activities performed in 2021.

As detailed in previous reports, significant time and resources were dedicated to allegations of misconduct in the Aquatics Department. These allegations brought to light not only misconduct, but also of failures in the Park District's reporting and administrative functions. At several locations, long-tolerated hazing behavior fostered an environment where bullying, harassing and sexual misconduct flourished and went unchallenged.

The year-to-year statistics at the end of this report reflect the large increase in cases primarily due to these allegations.* With the assistance of two added investigative teams,** the OIG has investigated and reported on 48 allegations of misconduct in the Aquatics Department. Where the allegations were deemed sustained, the Park District has followed the OIG's recommendations and taken appropriate disciplinary action.

Audits and hiring compliance activity also played key roles in providing the Board and Management detailed reviews of District-wide processes, along with recommendations for improvement. The Audit team and the Assistant Hiring Compliance Manager have designed comprehensive oversight plans for 2022 that will provide ongoing review of critical management functions.

*The marked increase in new cases in the fourth quarter of 2021 are not the result of an influx of new allegations. Most of the Aquatics Department cases (2020-2021) had not been assigned separate case numbers at intake. Individual case numbers were assigned in the fourth quarter of 2021 for tracking purposes.

**In May 2021, the OIG engaged the law firm of Franzcek P.C. to aid in these investigations. To aid additional expertise to these investigations, in October 2021, the OIG hired two part-time investigators who each have extensive experience in sexual assault investigations.

While the OIG's ongoing function is to maintain integrity of operations at the Park District, there is an added goal in 2022: restoration of trust. The OIG will continue to work collaboratively with Park District Management to develop new initiatives, such as the Office of Prevention and Accountability. Independent review of existing functions will continue with added emphasis on reinstalling confidence in the Park District's Management and oversight activities.

Sincerely,

Alison R. Perona

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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.

Also in accordance with the Park District Code, the OIG conducts 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 2021, the OIG's adopted budget was \$719,791.

Personnel

As of December 31, 2021, the OIG was staffed as follows: an Interim Inspector General, Director of Audit, Assistant Compliance Officer, two full-time Auditors, one part-time investigator, and two part-time contractual investigators. The OIG also receives regular support from law enforcement personnel.

The approved 2022 budget will enable the OIG to add two full-time investigators and an administrative assistant to the staff.

Training and Investigation Standards

Each employee of the OIG is a member of the Association of Inspectors General, a national organization of state, local, and federal Inspectors General and their staffs. 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 (which is colloquially known as "The Green Book").

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

Investigations

In 2021, the OIG investigated and reported findings on a total of 55 cases of suspected fraud, waste, abuse or misconduct to the Board of Commissioners and Park District Management. The majority of these reports stemmed from allegations of misconduct, bullying and harassment in the Aquatics Department.

The Aquatics Department investigations are reported below. The results of other completed 2021 investigations are reported in the second half of this section.

AQUATICS DEPARTMENT INVESTIGATIONS

In March 2020, the Office of the General Superintendent & CEO forwarded two complaints to the OIG, each alleging that Chicago Park District employees in the Aquatics Department have engaged in employee-on-employee sexual abuse and assault, sexual harassment, physical abuse, bullying and hazing. At the General Superintendent & CEO's request, the OIG opened investigations into the two complaints and investigations into:

- Alleged instances of employee-on-employee sexual misconduct;
- Threats of retaliation made by supervisors and peers to discourage reporting;
- The alleged negative culture and work environments at several Park District beaches and aquatics centers; and,
- The Aquatics Department's oversight of the work environments at the Park District's beaches and aquatics centers and its enforcement of Park District policies.

The complainants alleged violations of The Employee Code of Conduct, The Policy on Sexual Harassment, and The Violence in the Workplace Policy.

In the process of investigating these complaints, additional allegations were identified or reported. Further, since the receipt of the first two complaints, new complaints have been reported to the OIG that involve similar allegations. The OIG's investigation is ongoing. Due to the seriousness of the allegations and resulting broad investigation, the OIG has issued Summary Reports of Investigation on a rolling basis to provide the Board and Management with findings and recommendations regarding individual subjects of investigations as expeditiously as possible. Allegations have been reported to the Department of Children and Family Services and the Chicago Police Department, as required or where appropriate.

Sustained Findings Resulting in Discipline of Current Employees

A MALE LIFEGUARD SUPERVISOR ENGAGED IN SEXUAL RELATIONSHIPS WITH THREE UNDERAGE FEMALE LIFEGUARDS

As reported in the OIG's Third Quarter report, investigators found credible evidence that a male lifeguard supervisor (32) engaged in a sexual relationship with a female lifeguard (16) who was under his supervision in 2021.

After those allegations were reported, two additional female lifeguards came forward and reported that they had also been sexually assaulted by the same supervisor in prior years. The OIG launched separate investigations into each of these complaints and found that the allegations were sustained.

The male lifeguard supervisor was placed on emergency suspension in September 2021. He resigned in October 2021. He has been charged in two of the cases with Criminal Sexual Assault and Aggravated Criminal Sexual Abuse.

Management followed the OIG's recommendation and placed the former employee on the "Do Not Rehire" list. (3rd and 4th Quarters)

A MALE HOURLY NATATORIUM INSTRUCTOR SEXUALLY ASSAULTED TWO FEMALE LIFEGUARDS IN SEPARATE OCCURRENCES

Two lifeguards (17 and 21) reported to the OIG that they were subjected to the unwanted sexual advances by a Natatorium Instructor. In each instance, the Natatorium Instructor attempted to force them into sexual activity at after-hours functions. Neither woman reported the incident because they did not feel that the Park District would properly handle their complaints.

The Natatorium Instructor was interviewed and denied that he sexually harassed or assaulted any female lifeguards. He was placed on emergency suspension and resigned before the conclusion of the investigation.

Management followed the OIG's recommendation to discharge this employee and designate him as "Do Not Rehire." (3rd Quarter)

Sustained Findings against Park District Supervisors or Managers for Failure to Report Misconduct as Required by Code or by Law

AN AQUATICS MANAGER FAILED TO REPORT ALLEGATIONS OF MISCONDUCT AND MISREPRESENTED HIS EMPLOYMENT RECORD

The OIG learned that an Aquatics Manager received information about misconduct and violations of Park District policies and procedures and failed to report the issues as required. The Manager disclaimed knowledge of some incidents. He also stated that, in some situations, he directed others to report allegations and assumed that this had been done.

During the course of the investigation, the OIG also learned that the Manager misrepresented information regarding his employment history when applying to the Park District.

Based on these findings, the OIG recommended that Management take appropriate disciplinary action. The Manager has been discharged. (4th Quarter)

A LIFEGUARD SUPERVISOR FAILED TO REPORT ALLEGATIONS OF BULLYING AND HARASSMENT

A former lifeguard provided the OIG with information that a lifeguard supervisor was aware of bullying and harassment activity by his subordinates and failed to act to stop it or report it. The supervisor denied that he was aware of any “hazing” or retaliatory behavior at his work location and denied knowledge of after-hours parties or initiations. He also stated that, while he was “pretty sure” that he had been trained on relevant Park District policies, he claimed to have limited knowledge of the requirements. However, several witnesses described the negative culture that included bullying and harassment that occurred at the supervisor’s work location.

The OIG recommended that the supervisor be disciplined and/or required to participate in extensive re-training. Management has issued a written reprimand to the employee and has devised a program of re-training for this individual. (4th Quarter)

A FORMER PARK DISTRICT OFFICIAL FAILED TO ACT ON A COMPLAINT OF SEXUAL HARRASSMENT AND BULLYING

In 2021, the OIG received a complaint against a Park District official alleging that the official failed to act on complaints of misconduct, bullying and harassment. The law firm of Arnold & Porter investigated this allegation in the Fall of 2021 and issued a report pertaining to this Manager's response to the complaint. They found that the Assistant Director of Recreation failed to act on the complaint as required by Park District policy.* The employee was terminated from employment on November 2, 2021. Based on the information detailed in the Arnold & Porter investigation, the OIG has deemed the allegation is sustained.

Since the employee has been terminated from employment and designated as "Do Not Rehire," the OIG has no further recommendations in this matter. (4th Quarter)

A LIFEGUARD SUPERVISOR WAS ALLEGED TO HAVE CONSUMED ALCOHOL WHILE ON DUTY AND OF FAILING TO REPORT BULLYING AND HARASSMENT

A lifeguard reported that her supervisor appeared to be drunk or high while on duty. Another witness related that he also saw the supervisor drunk at work in a previous year. These incidents were not reported to Management at the time and no alcohol or substance abuse testing was contemporaneously performed. The OIG was not able to find evidence to corroborate these allegations. (4th Quarter)

The complainant also reported that the supervisor called her demeaning names.

The supervisor was interviewed and denied being drunk or under the influence at work. He denied bullying or harassing any employee. He stated that no bullying or harassment occurred at the beach while he was the supervisor. This statement was directly contradicted by several witnesses who reported "hazing" and "rotting" (punitive work assignments) had occurred while he was the supervisor.

The OIG recommended that Management take appropriate disciplinary action.

The employee resigned during the OIG's investigation. Management has designated him as "Do Not Rehire." (4th Quarter)

*The Arnold & Porter report indicated that there was credible evidence that this manager "received information about potential policy violations taking place under his watch, all of which posed potential safety risks, yet he failed to make any further inquiries for details, failed to take any corrective actions, failed to report it to HR, and failed to follow up and check the status of any investigation." (See Report to the Board of Commissioners for the Chicago Park District Regarding the Lifeguard Investigation and Corrective Actions, page 27.)

A LIFEGUARD SUPERVISOR FAILED TO REPORT INFORMATION REGARDING ALLEGED SEXUAL ASSAULTS

During the investigations regarding alleged misconduct in the Aquatics Department, the OIG received information that an Hourly Natatorium Instructor had learned of two sexual assaults and failed to report them. The supervisor admitted that she had been informed of the assaults but did not report them because she was unclear about the reporting requirements.

Management agreed to the OIG's recommendation for discipline in this matter and has imposed a period of suspension and mandatory counseling and training. (4th Quarter)

A SUPERVISOR WAS ACCUSED OF BULLYING, HARASSMENT AND FAILURE TO REPORT

A complainant claimed that her former supervisor called her a demeaning name. The complainant stated that she felt this was in response to an alleged work-related sexual assault allegation. The supervisor denied knowledge of the assault and denied the name-calling.

The OIG was unable to find sufficient evidence to substantiate the complainant's allegation. Based on information obtained during the interview of the supervisor, the OIG recommended that the supervisor receive additional training to enhance the supervisor's skill set. Management agreed with this recommendation and has designed a training program for this employee. (4th Quarter)

Sustained Findings of Misconduct, Bullying and/or Harassment by Former Employees Resulting in a “Do Not Rehire” Designation

A MALE SUPERVISOR BULLIED AND HARASSED SEVERAL FEMALE LIFEGUARDS AND LIKELY ASSAULTED A DRUNK FEMALE PATRON

The OIG conducted three separate investigations into allegations of bullying and sexual harassment against a senior male lifeguard supervisor. Several female lifeguards described in detail how the supervisor would call them derogatory names, yell, and throw objects when angry. The OIG also learned that, in 2021, this male supervisor boasted to other lifeguards that he took a drunk female patron in the lifeguard trailer and sexually assaulted her. The circumstances surrounding the assault were confirmed by several witnesses. The OIG was unable to confirm the identity of the patron.

During his interview, the supervisor denied that he bullied or harassed any employee. He also denied sexually assaulting the patron.

The supervisor was suspended and resigned prior to the conclusion of the OIG investigation. Management has agreed with the OIG’s recommendation and has designated him as “Do Not Rehire.” (4th Quarter)

A MALE LIFEGUARD SEXUALLY ASSAULTED A FEMALE LIFEGUARD AT AFTER-HOURS EVENT AND SUBSEQUENTLY HARASSED HER

In 2016, a female lifeguard (16) and a male lifeguard (18) attended an off-duty function. This victim related that the male lifeguard induced her to consume alcohol. He gave her a ride home after the party and sexually assaulted her. She stated that she did not consent and was in and out of consciousness. She stated that the lifeguard later sent her a text and told her not to tell anyone.

Upon her return to work, the female lifeguard discovered that her co-workers had learned of the assault and taunted her. The following summer, the lifeguard harassed her and gave her undesirable work assignments. She believes that this was in retaliation for what had occurred the previous summer. The lifeguard was placed on emergency suspension in June 2021 and resigned later that month. He declined to be interviewed as part of this investigation.

Management followed the OIG’s recommendation and placed the former employee on the “Do Not Rehire” list. (3rd Quarter)

A MALE LIFEGUARD SUPERVISOR SEXUALLY ASSAULTED A SUBORDINATE FEMALE LIFEGUARD

A former lifeguard reported that she had engaged in a sexual relationship with her supervisor (20) in 1989 when she was 17. She told investigators that she came forward to report the relationship because she has realized that it was inappropriate and that he “manipulated her emotionally.” The supervisor is no longer employed by the Park District. As a result of a previous investigation, he had already been designated as “Do Not Rehire.” (4th Quarter)

A MALE LIFEGUARD SEXUALLY ASSAULTED A FEMALE LIFEGUARD AND ENGAGED IN A PATTERN OF BULLYING OTHER LIFEGUARDS

A lifeguard (16) reported that a male lifeguard (18) began flirting with her when they were assigned to the same beach in 2020. She stated that she developed a more intimate relationship with the lifeguard and had one consensual sexual encounter with him. She further related that she had provided nude photos of herself to the lifeguard, which were widely shared on social media and are the subject of a police investigation. She stated that on one later occasion the lifeguard drove her home and sexually assaulted her in his vehicle.

During this investigation, another victim (19) filed a complaint with the Park District alleging that this same male lifeguard was engaged in a pattern of harassment against her, that she witnessed him badgering other employees, and that he would yell at park patrons. Another employee confirmed the male lifeguard’s behavior to the investigators.

The male lifeguard resigned on May 26, 2021. He consented to be interviewed but was uncooperative—even refusing to answer basic questions about his employment.

Management followed the OIG’s recommendation and placed the former employee on the “Do Not Rehire” list. (3rd Quarter)

AN HOURLY NATATORIUM INSTRUCTOR SEXUALLY HARASSED AND THREATENED RETALIATION AGAINST SUBORDINATE FEMALE LIFEGUARDS

Three female lifeguards reported that a male Hourly Natatorium Instructor repeatedly sexually harassed, made unwanted sexual advances towards them, and threatened their employment. Each of the three victims told the OIG that they were not comfortable reporting the supervisor’s actions not only because of his threats, but also because they did not trust the supervisors in the Aquatics Department to take appropriate action.

During the course of this investigation, the OIG received information that, in 2016, Chicago Public Schools had terminated his employment as a lifeguard and placed him on the School District's Do Not Hire (DNH) list, for making inappropriate and "uncomfortable" advances toward two female high school students. He did not disclose to his superiors in the Aquatics Department of either his termination or DNH designation until early 2020, and only after CPS informed him that his DNH classification prohibited him from accessing pools at CPS facilities.

When interviewed, the supervisor denied knowing why CPS had terminated his employment or why the School District had classified him as DNH. He also categorically denied that he had sexually harassed, sexually propositioned, or threatened the employment of any female lifeguard under his supervision. The OIG recommended that the Park District terminate the supervisor's employment and designate him as Do Not Rehire. Although he resigned before the Park District could act on the OIG's recommendations, the Park District agreed with the OIG's recommendation and designated him as "Do Not Rehire." (2nd Quarter)

A VETERAN MALE LIFEGUARD SEXUALLY HARASSED AND ASSAULTED AN UNDERAGE FEMALE LIFEGUARD AND MADE THREATS AFTER THE ATTACK

A lifeguard (17) told the OIG that, in 2018, a male lifeguard had sexually assaulted her while driving her home after work. As they approached her house, he parked his automobile on the side of the street, refused to let her exit the vehicle, and directed her to give him oral sex while threatening to "make [her] life miserable" if she refused. The victim initially resisted him but acquiesced to his demands only because he was a more senior lifeguard at the beach who, she believed, could deliver on his threat. Her account was corroborated by two outcry witnesses. When confronted by the victim and her friend, he made threats against them.

The male lifeguard resigned while under investigation and declined to cooperate with the OIG. The Park District adopted the OIG's recommendation to designate him as "Do Not Rehire." (2nd Quarter)

ADDITIONAL CASES RESULTING IN A "DO NOT REHIRE" DESIGNATION

In addition to the cases reported above, the OIG reported an additional 10 cases where allegations of acts committed by former employees violated The Employee Code of Conduct, The Policy on Sexual Harassment, and/or The Violence in the Workplace Policy. The alleged behavior in these cases ranged from inappropriate/demeaning language, providing alcohol to minors, and "hazing." In each of these cases, the OIG recommended that the former employees be designated as "Do Not Rehire." Management has followed the OIG's recommendations in each of these matters.

Unfounded or Not Sustained Allegations

The OIG investigated 19 cases in which the investigative teams were unable to substantiate the allegations of misconduct, bullying or harassment. The complaints were deemed unfounded or not sustained. Since the allegations were unfounded or not sustained, the OIG is providing limited information on these investigations to protect the privacy of the individuals contacted in these cases.

- In five instances, the alleged victims denied being subjected to misconduct, bullying or harassment during the course of their employment. The OIG was unable to find any witnesses or evidence to substantiate the original complaints in these cases.
- In another nine cases, the potential victims refused to be interviewed by the OIG and/or refused to cooperate with the ongoing investigations. Where possible, they were provided information on how to contact the OIG or law enforcement if they decided to pursue the matter.
- Five complaints were determined to be unfounded or not sustained where there was no identifiable victim and/or no evidence (witnesses or physical evidence) to corroborate the (often anonymous) complaints.

OTHER INVESTIGATIONS

A PARK SUPERVISOR SEXUALLY ASSAULTED A SEASONAL RECREATION LEADER IN HIS OFFICE

A Seasonal Recreation Leader (25) reported that a male Park Supervisor (41) sexually assaulted her in the workplace. She told investigators that he invited her into his office to share drinks and a snack. He then physically blocked the door and sexually assaulted her. When interviewed, the Park Supervisor denied being the aggressor.

He was placed on Emergency Suspension during the investigation. He resigned after the OIG issued its report. Management has designated him as “Do Not Rehire.” (4th Quarter)

REVIEW OF INTERNAL CONTROLS AND REPORTING PROCESSES FOR THE RAPID RESPONSE PROGRAM

Prior to 2011, the Park District previously utilized the Job Order Contract services program (the “JOC”) to address small-to-medium-sized construction projects. In 2011, the Park District determined that it would save money by administering an in-house construction-procurement program that would create a competitive bidding-and-award process that was limited to a vendor pool comprised of prequalified general contractors.

Contracts in this Program are awarded outside of the Park District’s regular procurement processes. These jobs are not subjected to the same internal scrutiny as contracts outside the program and do not require individual Board approval as long as the initial contract cost does not exceed the \$2.5 million threshold.

The scope of this investigation was to review internal controls and compliance with established procedures governing capital projects and the Rapid Response Program.

Based on the findings in this review, the OIG recommended that Management update and/or formalize procedures and provide training for managers and employees, strengthen internal controls and oversight by ensuring adequate staffing and through consistent record-keeping practices, and provide semi-annual reports to the Board of Commissioners.

Management has agreed to provide semi-annual reports to the Board and is in the process of developing or updating systems and policies and procedures to strengthen internal controls. The OIG will monitor the implementation to ensure compliance. (4th Quarter)

SECURITY GUARD JOB QUALIFICATIONS

An anonymous caller reported to the OIG that a Park District Security Guard lacked the required law enforcement credentials for his position. The OIG opened a second case on its own initiative to examine the hiring and credentialing processes for security guard supervisors.

The Park District requires that security guards and security supervisors be certified by the Illinois Local Government Law Enforcement Officers Training Board as law enforcement officers. Correctional Officer certificates are not an acceptable credential in lieu of a Law Enforcement Officer certificate.

The OIG reviewed a sample of security personnel files provided by Human Resources (HR) and found deficiencies in the records. After reviewing the sample, OIG found no evidence that any of the individuals had copies of the required certifications in their personnel files. The OIG noted that over 95% of the files also lacked independent verification by HR of the individuals' employment with their respective law enforcement agencies. The OIG also verified that a number of Park District security employees did not have the requisite state law enforcement certificate.

Based on the findings, the OIG recommended that HR should audit the files of all Security Guards to determine if they meet the position requirements, the qualifications for the positions should be reviewed and updated as deemed necessary, and that all candidates should be screened and qualified by HR prior to the interviews.

Management has agreed to all of these recommendations and is working on implementation. (4th Quarter)

MISCONDUCT OF PARK ADVISORY COUNCIL MEMBER

The OIG received complaints that a Park Advisory Council (PAC) officer was in violation of Park District policies. A Park Supervisor had discovered a PAC officer in a locked area in the park. The PAC officer acknowledged that she was in possession of a key to the secured area, in violation of the rules. This was the second time the PAC officer was discovered in a prohibited area.

The PAC officer was also accused of striking another PAC member. The PAC officer asserted that the contact was accidental. The PAC officer was suspended from all activities as a result of this investigation. Despite the suspension, she appeared at two PAC meetings and had to be asked to leave.

Based on her history of misconduct, the OIG recommended that the PAC officer be banned from participating in the PAC and any future PAC activities. Management has followed the OIG's recommendation and has banned the PAC officer from further PAC participation. (4th Quarter)

FAILURE OF A PARK ADVISORY COUNCIL TO MAINTAIN RECORDS/REQUIRED BACKGROUND CHECKS

The OIG investigated allegations that a Park Advisory Council failed to maintain required records and had failed to submit information of volunteers for required background checks.

Background checks are an important tool to help ensure the safety of children and to protect the PAC from financial improprieties. The OIG confirmed that this PAC had failed to submit information on volunteers, as required by Park District policy. The OIG also confirmed that this PAC was not maintaining records required by the Park District.

Based on its investigation, the OIG recommended that the PAC should be directed to submit volunteer applications for every PAC member that handles funds or works with children so that the required background checks can be performed, the PAC should immediately update its records, and that the Park District conduct an audit of all PACs to ascertain if the PACs are in compliance with the background check requirement.

Management has agreed with all of the recommendations and is working with the PAC to ensure that it fulfills the requirements. Management is also in the process of auditing all PACs to ensure that volunteer applications have been received and background checks performed. (4th Quarter)

RESIDENCY VIOLATION

The OIG received a complaint that a Seasonal Laborer did not reside in the City of Chicago as required. His last day of employment was September 29, 2021.

A check of the employee's personnel file revealed that, on his application, he provided a suburban street address and zip code but indicated that the address was in Chicago. Records show that the employee was associated with that suburban address. No investigation or surveillance was performed since the employee's seasonal employment had already ended.

The OIG recommended that, if the former employee were to re-apply for employment, he be asked to provide proof of residency.

Management agreed and noted the issue on the former employee's file. (4th Quarter)

CONTRACTOR PENALIZED FOR FAILURE TO PRODUCE BUSINESS RECORDS

In its Third Quarter 2020 Report, the OIG reported that a construction contractor had failed to cooperate with the OIG's on-going review of a capital construction program. Specifically, the Prime Contractor failed to provide the OIG with required records pertaining to minority business utilization (M/WBE), which the company was required to maintain in the ordinary course of produce and produce upon request. As a result, the OIG recommended in June 2020 that the Park District not award any new construction contracts to the company until it had fully complied with the OIG's record requests. The OIG again provided the company with several opportunities to comply. In response, the company produced an incomplete set of records and provided several explanations for its failure to produce the required records (relocated offices, misplaced records, etc.) The OIG recommended that the contractor be debarred for a two-year period for failure to comply.

Although the Park District did not formally debar the company, no contracts were awarded to the company since the first quarter of 2020. After a recent joint review of the contractor's prior work history, records, and the findings from this investigation, the Purchasing Department and the OIG agreed that the company could be reinstated provided that it is put it on a six-month probationary period. Purchasing has agreed to closely monitor the contractor and evaluate its submitted documentation to ensure that the contractor is in compliance with Park District regulations. To ensure that both the Park District and the contractor are in compliance with the probation agreement, the OIG will perform an independent review of the contractor's documentation and of the Park District's monitoring process. (1st Quarter)

AUDIT AND REVIEWS

In 2021, the Audit Division of the Office of Inspector General completed the following audits and reviews:

ALLEGATION OF IMPROPER HANDLING OF DONATED PARK ADVISORY COUNCIL FUNDS

The OIG received complaints that the Humboldt Park Advisory Council (HPAC) may have mishandled funds while the PAC was suspended.

HPAC was suspended between February 2020 and May 2021 due to irregularities in the 2020 election of officers. (See following summary.) In December 2020, during the suspension, the HPAC Treasurer wrote a check for \$15,355 made out to and deposited by the Chicago Park District.

The funds had been donated to HPAC in August 2019 by a private individual for children's programs. While HPAC was suspended, the donor wanted the funds transferred so that the money could be immediately used for this purpose instead of sitting in a dormant account. The OIG confirmed with the donor that he sent a request to HPAC in December 2020 requesting that the funds be transferred to the Park District. The OIG found that the funds were transferred in accordance with Park District rules.

While there is no evidence of misconduct in this case, clearly defined rules regarding procedures for handling of suspended or disbanded PAC's funds would lessen the possibility of conversion of funds and would protect PAC officers from allegations of impropriety. The OIG recommended that CPD should enact new rules pertaining to the usage or disposition of PAC funds in the event a PAC is suspended or disbanded.

Management has agreed to amend the procedures. Implementation is pending. (4th Quarter)

OVERSIGHT OF PARK ADVISORY COUNCIL ELECTIONS

In 2021, the Audit Division monitored the processes of two Park Advisory Council (PAC) elections to ensure the integrity of the elections and to validate the results.

OIG personnel, along with Park District staff, oversaw various facets of the election process, including but not limited to verification of eligibility to run for office, verification of eligibility to vote in the election, and monitoring of the ballot collection and counting processes.

Humboldt Park

In March 2020, the OIG determined that the January 2020 elections for positions on Humboldt Park's Advisory Council had violated the Advisory Council's Bylaws and Park District guidelines. Consequently, the Park District invalidated the election results. Because of COVID-19 restrictions, the election was postponed until May 2021. The OIG's Audit Department agreed to monitor the May 2021 election.

Based on the observations and review of the elections' processes and outcomes, the Audit Department and the Park District concluded that the May 2021 election was conducted according to the PAC's bylaws and the Park District's Guidelines. The election results were certified as valid. (2nd Quarter)

Jackson Park

In November 2021, at the request of the Park District, the OIG monitored the election of board members for the Jackson Park Advisory Council (JPAC).

Based on the observations and review of the elections' processes and outcomes, the Audit Department and the Park District concluded that the November 2021 election was conducted according to the PAC's bylaws and the Park District's Guidelines. The election results were certified as valid. (4th Quarter)

FRANKLIN PARK ADVISORY COUNCIL FUNDS

A 2019 OIG investigation revealed that two Franklin Park employees illegally bought food stamp cards from SNAP recipients and used the cards to purchase candy and snack items to supply a concession that operated at the park. The Franklin Park Advisory Council (FPAC) received the proceeds of the concession sales. Between 2015 and 2019, the employees purchased more than \$32,000 in items.

As a result of these findings, the OIG attempted to perform a financial audit of the PAC. Despite repeated requests by the OIG, none of the PAC members provided the PAC's financial records. Because of PAC's lack of cooperation in this matter, the OIG was unable to locate or validate the funds in FPAC's account.

Current PAC guidelines do not have any rules pertaining to the usage or disposition of PAC funds if a PAC is suspended or disbanded. The lack of accountability for these funds could create a situation that leads to misuse or misappropriation.

Because of the serious implications related to the failure to produce financial records, the OIG recommended that the Park District should immediately disband the Franklin Park Advisory Council, permanently ban the uncooperative Board members from all future Park Advisory Council activities, enact a new policy requiring that PAC Board members comply with CPD requests for information pertaining to the PAC's finance or business records, and enact new rules pertaining to the usage or disposition of PAC funds in the event a PAC is suspended or disbanded.

Management has agreed to disband and reconstitute the Franklin Park Advisory Council. The former Board members have been banned from any future Council activity. Management has agreed to amend the policies and procedures. Implementation is pending. (4th Quarter)

ASSET MANAGEMENT AND INVENTORY-CONTROL

The Park District's Asset-Management Policy requires departments to maintain updated electronic records that reflect all capital assets with costs greater than \$500 but below \$25,000. The Policy also applies to all items that have a high potential for theft or misuse — such as portable electronic equipment — regardless of those items' costs. The policy requires that employees notify the District's Department of Facilities Management upon receipt of new, qualifying equipment so that property inspectors can apply asset tags directly to the equipment. Once equipment is asset-tagged, departments must include all corresponding asset tag information in their electronic records. The Park District's Comptroller's Office and the District's property inspectors, with assistance from the Audit Department, have the responsibility to verify that departments have properly inventoried and tagged all applicable assets.

The OIG examined 2019-2020 invoices. Of the 68,015 purchased items, the OIG identified 43 items across 26 parks that had a heightened risk of theft (televisions and game systems, portable air conditioners, exercise equipment, etc.) and then performed on-sight verifications to determine whether the items were properly asset-tagged. Of the 43 items selected for the OIG's review, 23 — or 53% — were not asset-tagged, contrary to the Asset-Management Policy's requirements.

In late December 2020 and early January 2021, the OIG provided information and instructions on the asset-tagging policy to personnel at the Park District locations that were not in compliance with the Policy. By March 2021, 15 of the 23 noncompliant items had been properly asset-tagged. By April 2021, the remaining eight untagged items were properly asset-tagged.

In light of the review's results, the OIG recommended that the Park District Comptroller's Office and Department of Facilities Management work together to revise policies with the goal of strengthening internal inventory controls, including standardization of District-wide procedures, establishment of deadlines for asset-tagging and inventory, establishment of an asset-tracking system to account for the movement or redistribution of assets, and on-going asset management training for managers, inspectors and supervisors.

Management had taken the recommendations under advisement. The response is pending.
(2nd Quarter)

Hiring Compliance Monitoring Activity

Fourth Quarter 2021

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 4th Quarter is summarized below. Information on prior activity can be found in the OIG's Quarterly Reports.

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 2021. Since the OIG started reporting the Park District's hiring-compliance-monitoring activity, HR has never 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. The following modifications to the Exempt List were approved in the Fourth Quarter:

- Positions added to the Exempt List (0)
- Positions removed from the Exempt List (6)

Review of Exempt Management Hires

HR reported two Exempt hires during the Fourth Quarter of 2021. The two exempt hires were a Special Projects Facilitator and a Senior Financial Analyst.

Review of Written Rationales

The OIG reviews written rationales when no consensus 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 2021. 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 2021. HR has never reported an emergency appointment.

Arbitrations and Grievances

The OIG audits all arbitrations and grievances involving hiring, promotions, transfers, or allegations of unlawful political discrimination. HR did not report any arbitrations or grievances during the Fourth Quarter of 2021.

Hiring Sequence Audits

The OIG audited a sample of Park District hires in the Fourth Quarter of 2021 for compliance with the Employment Plan. The audits continue to show that the Park District’s transition to a new database has resulted in a decrease in the availability of relevant hiring information for the purpose of compliance oversight. OIG has encountered hiring files without any required information uploaded about qualified candidate pools, interview rating forms, or proof of candidate qualifications. OIG will continue to work with the Park District to improve these issues and report on the progress.

The following hiring sequences from Q4 2021 were audited:

#2100281 Lifeguard

- Applicants: 85
- Qualified candidates: 70
- Candidates interviewed: 69

#2100025 Operating Engineer

- Applicants: 185
- Qualified candidates: 83
- Candidates interviewed: 31

#2100001 Junior Laborer

- Applicants: 667
- Qualified candidates: No interviews were held. All candidates who met MQ were invited to pre-hire processing
- Candidates interviewed: 525

#2100072 Laborer Maintenance

- Applicants: 282
- Qualified candidates: 59
- Candidates interviewed: 59

#2100372 Recreation Leader

- Applicants: 19
- Qualified candidates: 9
- Candidates interviewed: 9

#2100442 Senior Financial Analyst

- Applicants: 4
- Qualified candidates: No minimally qualified list of candidates available
- Candidates interviewed: 3

Mass Interview Compliance Monitoring Review

During the Fourth Quarter of 2021, the Assistant Compliance Monitor observed Park District personnel conduct mass interviews at Garfield Park of potential candidates for the following positions:

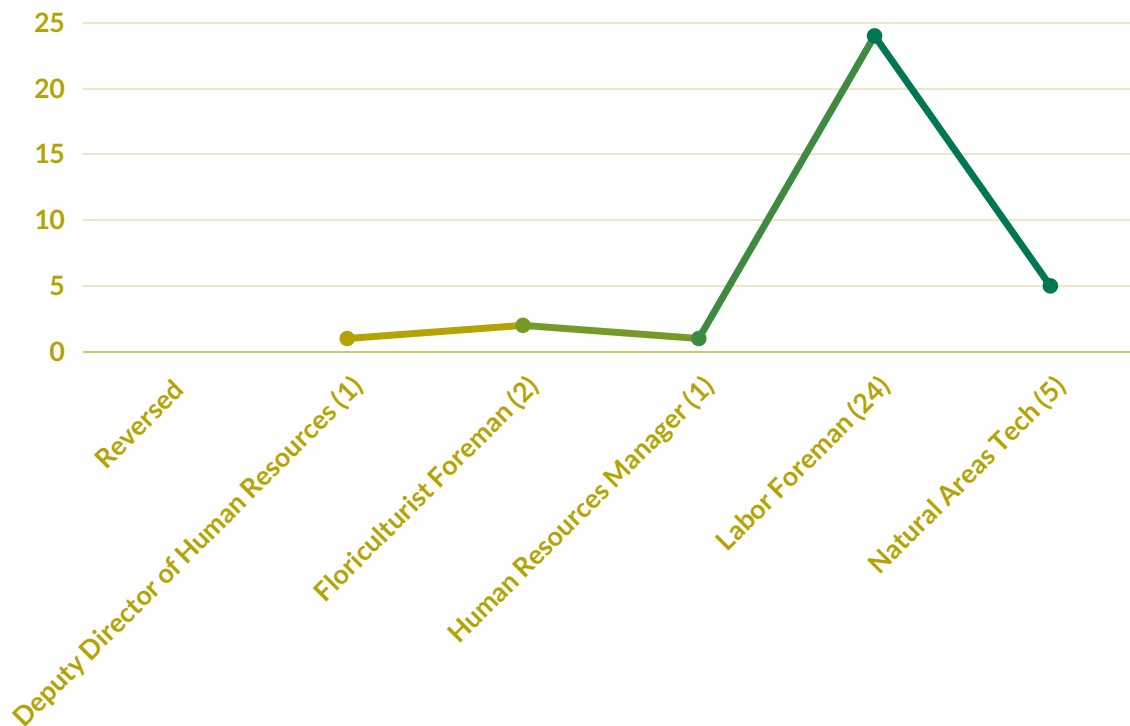
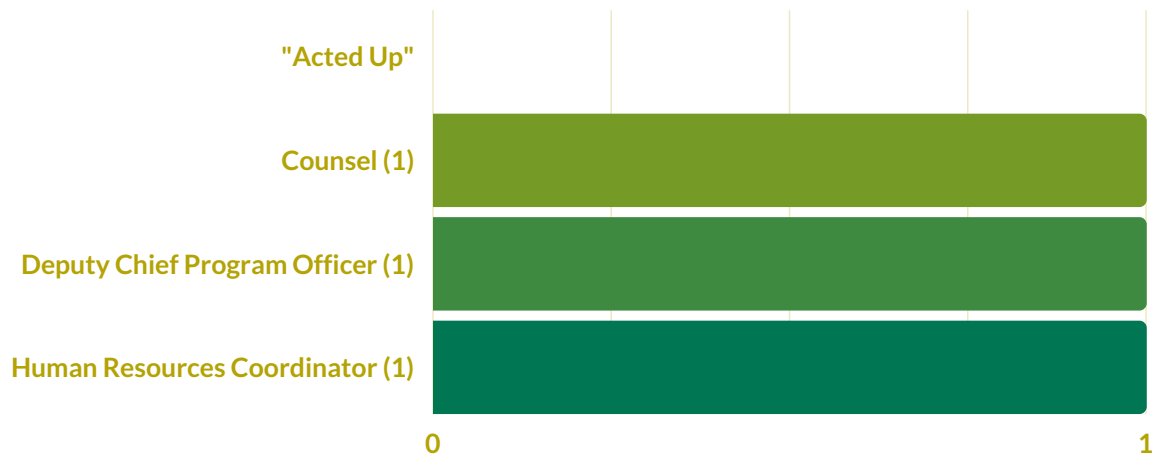
- | | |
|--------------------------------------|-------------------------------------|
| ◦ Natatorium Instructor (Hourly): 12 | ◦ Playground Supervisor: 17 |
| ◦ Natatorium Instructor (Monthly): 8 | ◦ Attendant (Hourly): 21 |
| ◦ Physical Instructor (Hourly): 21 | ◦ Physical Instructor (Monthly): 24 |
| ◦ Recreational Leader: 19 | ◦ Park Supervisor: 12 |

No deviation from the Park District's Employment Plan or other compliance issues were detected. The OIG will continue to randomly monitor the hiring process at the Park District in order to ensure compliance with all applicable laws and regulations and make recommendations to improve the efficacy and integrity of the process, where warranted.

Review of “Acting Up” Activity

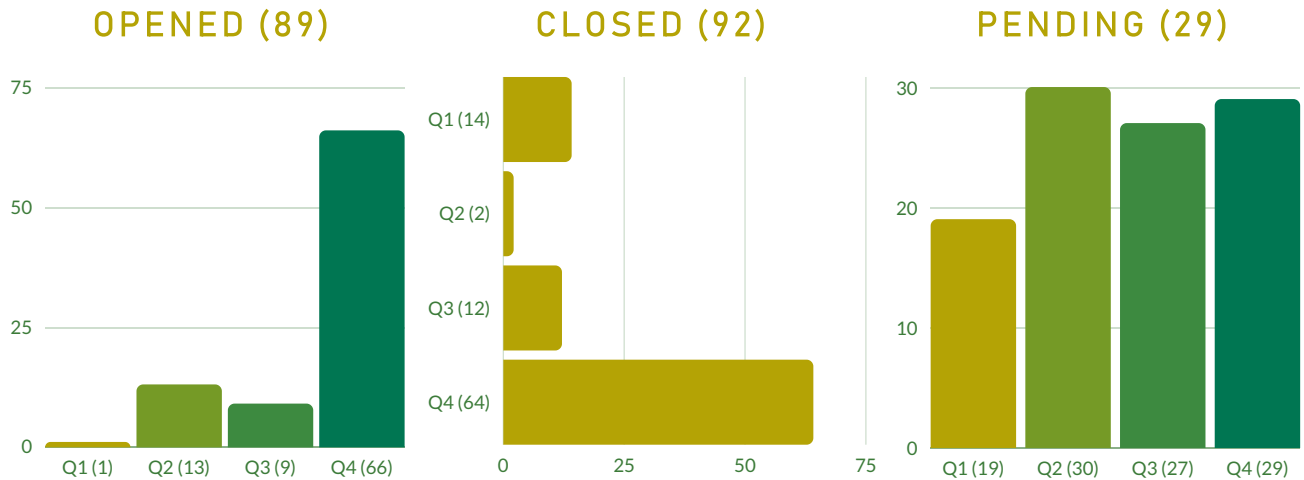
The OIG reviews each circumstance when an employee “acts up” (performing all or substantially all of the duties of an employee in a higher-paid classification). Activity in the Fourth Quarter of 2021 showed that, on three instances, employees had “acted up,” and 33 instances where employees who had been in “acting up” status were placed back in their positions or promoted.

“Acting Up” Activity - Fourth Quarter of 2021

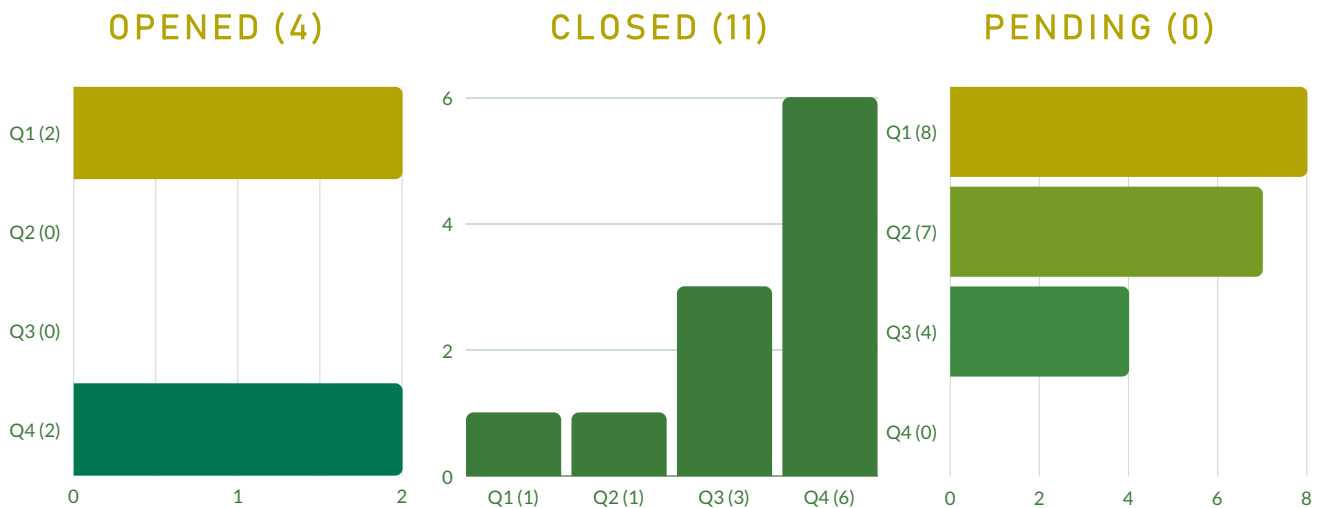


Annual Information

INVESTIGATIONS



REVIEWS



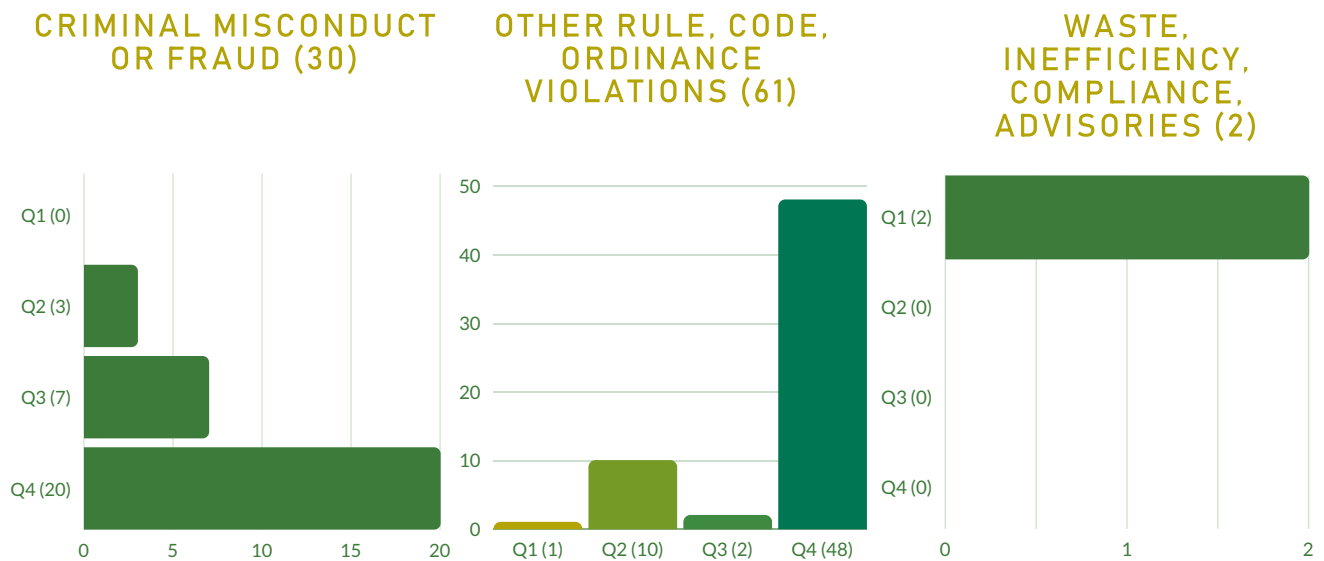
The marked increase in new cases in the fourth quarter of 2021 are not the result of a influx of new allegations. Most of the Aquatics Department cases (2020-2021) had not been assigned separate case numbers at intake. Individual case numbers were assigned in the fourth quarter of 2021 for tracking purposes.

Pending matters include carry-over from 2020-2021.

AUDITS*

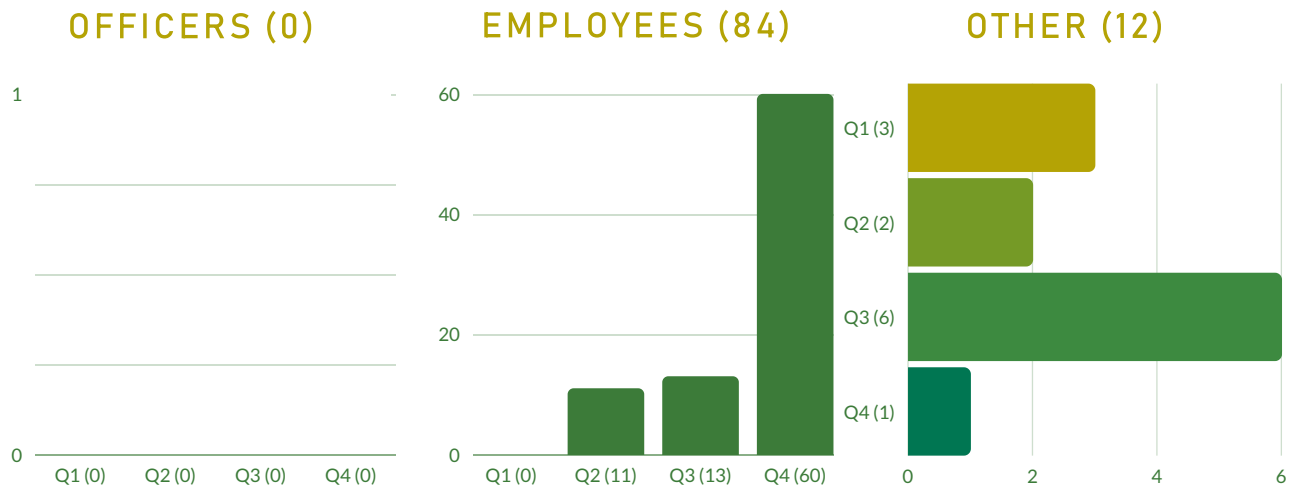


TYPES OF INVESTIGATIONS AND REVIEWS



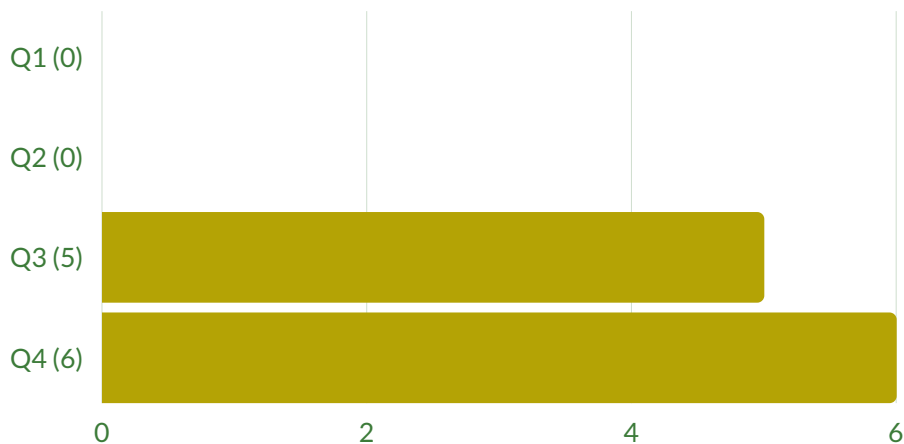
*This updated figure reflects a correction of Audit statistics previously reported in 2021.

INVESTIGATED AND REVIEWED PARTIES



HIRING COMPLIANCE

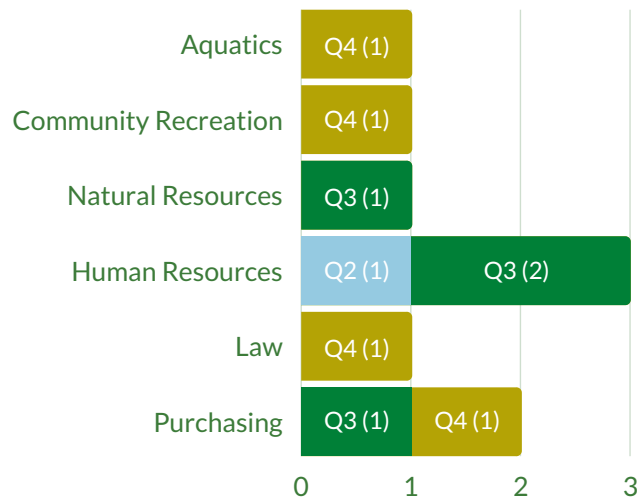
AUDITS & REVIEWS (11)*



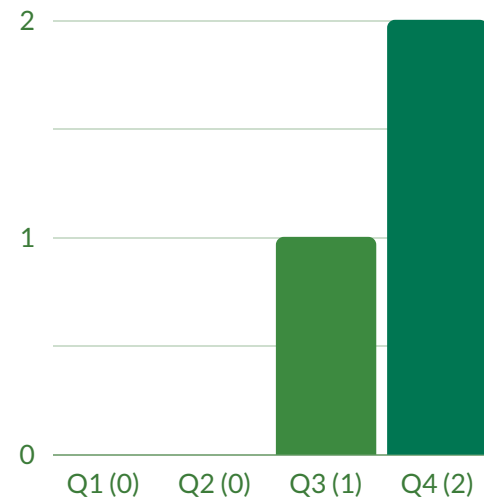
Other includes agents, concessionaires, contractors, and unknown parties.

*Due to Covid-19, during the first and second quarters of 2021, the OIG did not complete any Hiring Compliance Audits or Reviews.

INTERNAL ASSIST

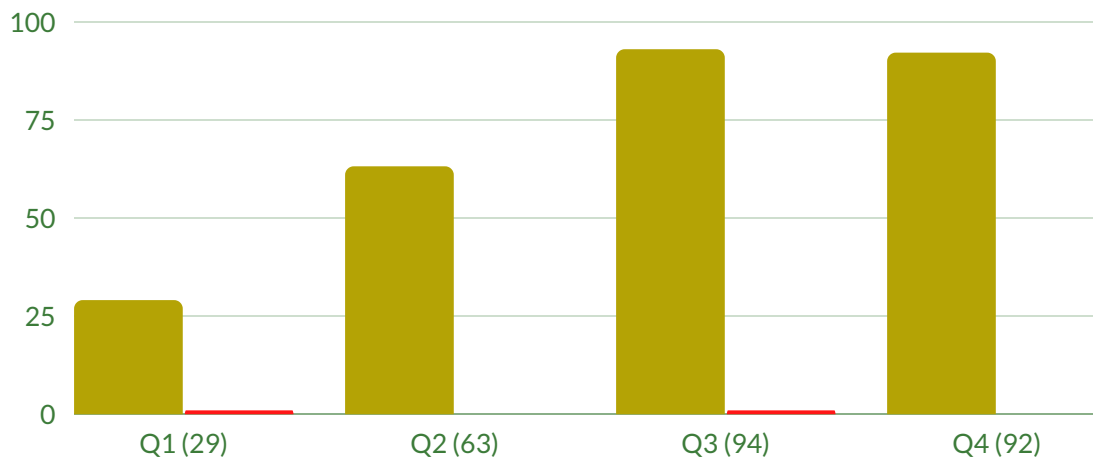


EXTERNAL ASSIST



COMPLAINTS RECEIVED

(278)



As depicted above in the color red, in both the first and third quarters of 2021, the OIG referred one Covid-19 related complaint to the Park District's Department of Risk Management.

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

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 four pending matters, as well as the reasons for their continuing pending status, are listed below:

CASE NUMBER	MATTER TYPE	NATURE OF ALLEGATION	REASON
20-Q1-0057-AI	ADMINISTRATIVE INVESTIGATION	CRIMINAL MISCONDUCT OR FRAUD	AVAILABLE TIME AND RESOURCES
20-Q1-0058-AI	ADMINISTRATIVE INVESTIGATION	CRIMINAL MISCONDUCT OR FRAUD	AVAILABLE TIME AND RESOURCES
21-Q2-0050-AI	ADMINISTRATIVE INVESTIGATION	CRIMINAL MISCONDUCT OR FRAUD	AVAILABLE TIME AND RESOURCES
21-Q2-0092-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES