

**CHICAGO PARK DISTRICT
OFFICE OF INSPECTOR GENERAL**

ELAINE L. LITTLE, INSPECTOR GENERAL

**OIG
SECOND
QUARTER
2021
REPORT**





Elaine L. Little
Inspector General

CHICAGO PARK DISTRICT OFFICE OF INSPECTOR GENERAL

740 N. Sedgwick St., 3rd Fl.
Chicago, IL 60654
312.742.9500 (Main)
312.742.3333 (OIG Hotline)
312.742.9505 (Fax)

Second Quarter 2021 Report

To the Chicago Park District Board of Commissioners, Park District employees, and Residents of the City of Chicago, it is with great pleasure that I present the Chicago Park District Office of Inspector General's 2021 Second Quarter Report.

The variety of the cases discussed in this report reflect the OIG's commitment to investigate, review and audit all matters "pertaining to waste, fraud, and abuse within the District" involving Park District employees, vendors, contractors, subcontractors, etc.

However, this quarter, the OIG is reporting on matters that have not traditionally been under its investigative umbrella. The OIG has undertaken investigations of recent allegations of sexual assault and abuse, at the request of the Park District. This newest subject matter has brought the OIG to propose a reorganization of its investigative structure and a broadening of its investigative scope. The OIG's ability to fulfill the scope of its mission — including investigating this newest subject matter — is, to a large measure, dependent on having the necessary resources to do the work. The Park District has demonstrated in several ways that it supports and embraces the OIG's independent oversight role and broadened scope. However, the OIG requires appropriate funding to hire additional investigative staff, provide appropriate training, and adequately update its case management system. While understanding the Park District's acute financial constraints during and immediately post-pandemic, the OIG finds its proposal to be a necessary use of Park District resources. The OIG remains cautiously optimistic about receiving the additional resources as proposed.

Sincerely,

Elaine L. Little
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 the mission:

- To investigate allegations of fraud, waste, and abuse or misconduct by Chicago Park District employees, members of the Board of Commissioners, contractors, agents, and volunteers; and
- To monitor 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

For FY 2021, the OIG's adopted budget is \$814,197.

Personnel

The OIG has employed the following personnel in the Second Quarter of FY 2021: The Inspector General, Deputy Inspector General, Director of Audit, Assistant Compliance Officer, one full-time Investigator, two full-time Auditors, and one part-time Investigator. One full-time Investigator and two part-time Investigator positions are currently unfilled. In addition, the OIG receives regular support from law enforcement personnel.

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. The AIG offers training seminars and certification institutes for members, as well as networking opportunities. Participation in the AIG also 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. Several OIG employees are in the process of obtaining their AIG certification as Certified Inspector General or Certified Inspector General Investigator.

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.

Investigations

THE OIG FOUND THAT THREE VETERAN PARK DISTRICT LIFEGUARDS HAD ENGAGED IN SEPARATE INSTANCES OF SEXUAL MISCONDUCT

In March 2020, the OIG received two complaints that together claimed that Chicago Park District employees in the Aquatics Department had engaged in employee-on-employee sexual harassment, sexual abuse, and sexual assault, as well as bullying, hazing, and other types of physical abuse. In response, the OIG opened several investigations as part of a wide-ranging, comprehensive, and robust review of the Aquatics Department. The OIG immediately prioritized investigating the allegations, and began its review of the Aquatics Department in earnest.

As the OIG's investigations progressed, the Office uncovered evidence that showed that several veteran male Park District lifeguards had each engaged in various types of sexual misconduct. That evidence was extensive, detailed, and corroborated; it established that the lifeguards represented continuing threats to the safety and welfare of their victims, other Park District employees, and Park District patrons. Consequently, in the late summer of 2020, the OIG recommended that the District place the lifeguards on Emergency Suspensions until the Office completed its investigations of the respective allegations. The Park District immediately adopted the OIG's recommendations and suspended each of the lifeguards. Moreover, each individual remained suspended until the OIG reported its findings and recommendations to the Board of Commissioners regarding each respective investigation.

The OIG has since completed investigations of three of the suspended lifeguards, and reported its investigative findings and recommendations to the Board. The OIG also has encouraged victims of criminal acts to report their ordeals to law enforcement authorities. The outcomes of those investigations are summarized below.

A Male Hourly Natatorium Instructor Sexually Harassed, Made Unwanted Sexual Advances Toward, and Threatened Retaliation Against Three Subordinate Female Lifeguards

An OIG investigation concluded it was more likely than not that, in 2018 and 2019, an hourly natatorium instructor at a Park District pool (Subject 1) had violated the Park District's Employee Code of Conduct, the District's Policy on Sexual Harassment, and its Violence in the Workplace Policy, when he repeatedly sexually harassed, made unwanted sexual advances toward, and threatened the employment of three female lifeguards whom he had supervised. One of those lifeguards, Victim 1, told the OIG that Subject 1 had told her that he would provide her with a

ride from the park after work, but only if she performed oral sex on him — a demand that was witnessed and corroborated by two other female lifeguards whom Subject 1 had also harassed, Victim 2 and Victim 3. Even more, Victim 1 recounted that Subject 1 had propositioned her to shower nude with him at the park. After Victim 1 told Subject 1 that she planned to report his actions to his supervisors he threatened to retaliate against her, stating, “I will just block it, you think they are going to believe you over me? I’m a worker.”

Victim 2, in turn, told the OIG that, on several occasions and in the presence of several child patrons, Subject 1 commented on “the view” that her shorts afforded of her buttocks. Subject 1 also repeatedly propositioned Victim 2 to have sex, including once in front of another group of child patrons.

The OIG also spoke with Victim 3. She recounted that Subject 1 repeatedly harassed her by making unwelcomed comments about how she looked in a swimsuit. At one point, Subject 1’s harassment brought Victim 3 to tears, which Victim 2 witnessed. Subject 1 would also make sexual comments about other female lifeguards to Victim 3, and would describe to her personal “issues” that he was having with women. Notably, Subject 1 told Victim 3 that she and other female lifeguards should wrestle in their swimsuits while he sprayed them with water because the scene “would be so sexy.” When Victim 3 asked Subject 1 to stop making sexual comments about her and other women, he threatened to revoke the time off that he had already approved — similarly to how he had threatened to retaliate against Victim 1.

Each of the three victims told the OIG that they were not comfortable reporting Subject 1’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. Victim 2, in particular, recounted that Subject 1 had told her that his immediate supervisor would not believe any complaint that she may bring, and that Subject 1 would work with his supervisor to “get [her] fired.” Similarly, Victim 3 stated that she was “scared” to report Subject 1’s actions because she believed that his superiors would reveal that she specifically had brought a complaint against him but not impose any discipline, thus exposing her to Subject 1’s threatened acts of retaliation.

In addition to obtaining the statements of Victim 1, Victim 2, and Victim 3, 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 schools students. Subject 1 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.

For his part, Subject 1 told the OIG that he did not know why CPS had terminated his

employment or why the School District had classified him as DNH. However, Subject 1's claim directly contradicted CPS's investigative documents that the OIG had obtained, which reflect that investigators had spoken with Subject 1 specifically about the students' allegations that he had engaged in inappropriate behavior toward them. Subject 1 also categorically denied that he had sexually harassed, sexually propositioned, or threatened the employment of any female lifeguard under his supervision. When the OIG asked Subject 1 why he had believed that several individuals would each accuse him of engaging in such serious misconduct, he merely speculated that they were upset with him — two years later — because he would not acquiesce to their various scheduling requests. Subject 1's explanation, the OIG determined, was not credible, particularly given the extent to which the allegations against him were independently corroborated by his three Victims.

Based on its investigation, the OIG recommended that the Park District terminate Subject 1's employment and designate him as Do Not Rehire. Although Subject 1 resigned his employment before the Park District could act on the OIG's recommendations, the Park District subsequently designated him as Do Not Rehire.

A Veteran Male Lifeguard Forced a Rookie, Underage Female Lifeguard to Perform Oral Sex on Him Before He Attempted to Rape Her; Threatened Her and Her Friend, Whom She had Told About the Assault; and Sexually Harassed Her both Before and After the Attack

Another OIG investigation concluded it was more likely than not that a veteran male lifeguard assigned to a Park District beach (Subject 2) had violated Illinois criminal law, the Park District's Employee Code of Conduct, the District's Policy on Sexual Harassment, and its Violence in the Workplace Policy. Specifically, the OIG concluded, a preponderance of the evidence established that Subject 2 had committed criminal aggravated sexual abuse and criminal sexual assault against a rookie female lifeguard at the same beach who, at the time, was underage. The OIG further concluded that Subject 2 had (1) physically threatened his Victim and her friend, whom she had told about the assault; and (2) sexually harassed his Victim both before and after the assault. Evidence also established that Subject 2 had violated the Park District's prohibition on possessing or consuming alcohol while on duty.

In detailed and corroborated testimony, Subject 2's Victim told the OIG that, in 2018, he had sexually abused and sexually assaulted her while driving her home after work. On the day in question, Subject 2's Victim unexpectedly found herself without transportation from work, and Subject 2 offered to drive her home. Although Subject 2 had repeatedly sexually harassed his Victim while they were on duty together, she reluctantly took him up his offer. But as they approached her house, Subject 2 parked his automobile on the side of the street, refused to let his Victim exit the vehicle, and directed her to give him oral sex while threatening to "make [her]

life miserable” if she refused.

The Victim initially rebuffed Subject 2, but acquiesced to his demands only because he was a more senior lifeguard at the beach who, she believed, could deliver on his threat. Subject 2 then suddenly forced himself on top of her, fondled her breasts and genitalia without her consent, and attempted to rape her. Subject 2 stopped only after his Victim repeatedly screamed for him to stop; he eventually let her exit his automobile. The Victim’s account was corroborated by two other female lifeguards, who each independently told the OIG that the Victim had related to them individually that Subject 2 had sexually assaulted her in his automobile after trapping her inside.

The Victim also recounted to the OIG that, two years after Subject 2’s attack, she told a friend (who also was a coworker as a lifeguard) that Subject 2 had sexually assaulted her. Shortly thereafter, the Victim’s friend confronted Subject 2 about the attack. Subject 2, in turn, sent a threatening text message to the Victim (a copy of which the OIG obtained), stating that she and her friend “got [explicative] coming for [them].” That message, the Victim told the OIG, led her to fear for her and her family’s safety.

The OIG further concluded that Subject 2 had also sexually harassed his Victim both before and after he had assaulted her. As alluded to earlier, Subject 2’s Victim related that, in the weeks leading up to the assault, he would make unwelcomed sexual comments to her about her buttocks while both were on duty. And over the course of the year following the assault, Subject 2 continued to sexually harass his Victim, including by preliminarily nominating her to receive an “award” at the beach’s end-of-the-year banquet that designated her “Slut of the Beach.” The Victim had learned of Subject 2’s “nomination” through sympathetic co-workers, who intervened on her behalf to scuttle Subject 2’s plans after she became visibly upset.

Finally, the OIG concluded that Subject 2 had violated the Employee Code of Conduct by possessing and consuming alcohol while on duty. In detailed and credible testimony, a lifeguard told the OIG that, while on beach duty for the 2018 Air & Water Show, he/she saw Subject 2 drink alcoholic beverages to the point where he was obviously intoxicated. Specifically, the lifeguard recounted, Subject 2 stumbled and swayed while patrolling the beach and reeked of alcohol.

Subject 2 resigned while under investigation and declined to cooperate with the OIG. Because Subject 2 was no longer a Park District employee, the OIG recommended that the District designate him as Do Not Rehire. The Park District adopted the OIG’s recommendation.

A Veteran Seasonal Male Lifeguard Sexually Assaulted and Sexually Abused Female Lifeguards While on Duty; He Also Sexually Harassed Both Victims

A third OIG investigation concluded it was more likely than not that, on numerous occasions between 2016 and 2018, a veteran seasonal male lifeguard (Subject 3) had violated Illinois criminal law, the Park District's Employee Code of Conduct, the District's Policy on Sexual Harassment, and its Violence in the Workplace Policy. Detailed, credible, and corroborated testimonial evidence established that, while on duty at a Park District pool in 2016, Subject 3 committed criminal sexual abuse by "molest[ing]" of a junior female lifeguard who worked at the same pool (Victim 1). While Victim 1 was attempting to take a pre-shift nap in the facility's women's locker room, Subject 3 entered, laid down next to her, and fondled her breasts and genitalia over her clothing. Even though Victim 1 repeatedly pleaded for Subject 3 to stop and attempted to push his hands away from her body, he continued. Victim 1 believed that Subject 3 had stopped after he apparently realized that his coworkers would notice his prolonged absence from the pool area. Victim 1 also recounted that Subject 3 had repeatedly sexually harassed her by constantly asking her whether she had ever had sex.

Evidence further showed that, while on duty at a different Park District pool in 2018, Subject 3 sexually abused and sexually assaulted an underage female lifeguard (Victim 2). When Victim 2 began her shift, she entered a storage room that lifeguards used to change to begin putting on her lifeguard attire. As Victim 2 was changing, Subject 3 entered the room, closed the door behind him, pinned Victim 2 against lockers in the room, and forcefully sexually abused and assaulted her. Victim 2 repeatedly told Subject 3 to stop, but he ignored her pleas. Victim 2 eventually pushed Subject 3 off of her and ran out of the room to the pool area to escape.

Moreover, Subject 3 repeatedly sexually harassed Victim 2 both before and after he had sexually attacked her. Victim 2 recounted that, before Subject 3's attack, he had propositioned her to enter into a sexual relationship, and made numerous unwelcomed comments about her buttocks. Subject 3 also would make unwelcomed, sexually charged comments to Victim 2 regarding his genitalia. Even after Subject 3 attacked Victim 2, he continued to harass her. Disturbingly, he frequently referenced his assault by saying to her, "Tell me you didn't like it," and continued to proposition her to enter into a sexual rendezvous.

Victim 1 and Victim 2 corroborated one another's version of events by independently recounting to the OIG what they had told each other when discussing how Subject 2 attacked them. Specifically, Victim 1 and Victim 2 separately explained to the OIG that, while working together in 2020, they had confided in one another that Subject 3 had accosted them. Victim 2 learned from Victim 1 that she had been sexually abused by Subject 3. Victim 2, in turn, related to Victim 1 that Subject 3 had also assaulted her. Even more, Victim 1 — who had already told the OIG that Subject 3 had sexually harassed and sexually abused her — provided Victim 2 with the OIG's

contact information in the event that she wished to report Subject 3's assault.

When the OIG attempted to interview Subject 3, he informed the Office that he did not intend to reapply for a seasonal lifeguard position, and thus declined to cooperate with the OIG's investigation. Because Subject 3 was no longer an employee, the OIG recommended that the Park District designate Subject 3 as Do Not Rehire. The Park District adopted the OIG's recommendation.

Advisory

THE OIG ADVISED THE PARK DISTRICT BOARD OF COMMISSIONERS ABOUT NEEDED REVISIONS TO THE DISTRICT'S ASSET-MANAGEMENT AND INVENTORY-CONTROL POLICY

OIG Advisory Letters serve to provide notice to the Park District Board of Commissioners of management problems or verifiable potential risks (1) that hinder the effectiveness of the Park District's operations or programs; but (2) of which the OIG has not conducted a full audit or review. In June, the OIG issued an Advisory Letter to inform the Board of the results of a District-wide review of purchasing activity that the Office had undertaken to determine whether District facilities complied with the District's Asset-Management and Inventory-Control Policy throughout 2019 and 2020.

As pertinent here, the Park District's Asset-Management Policy requires District departments (1) to maintain updated electronic records — that is, a standard Excel spreadsheet — that reflect all capital assets with costs greater than \$500 but below \$25,000; and (2) to 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. 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.

Asset tags are used to account for, and control, Park District departments' inventory. Specifically, once equipment is asset-tagged, departments must include all corresponding asset-tag information in their electronic records. Ultimately, it falls to the Park District's Comptroller's Office and the District's property inspectors, with assistance from the Audit Department, to verify that departments have properly inventoried and tagged all applicable assets.

The OIG determined that, in 2019 and 2020, the Park District had invoiced purchases of 68,015 items, District-wide (38,092 items in 2019, and 29,923 items in 2020). Of those 68,015 purchased items, the OIG compiled a sample of 43 items across 26 parks that carried with them a heightened risk of theft. Those items included televisions, portable electronic systems, portable air conditioners, exercise bikes, PlayStation video game systems, and popcorn machines. The OIG 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 personnel at each Park District location not in compliance with the Policy with instructions detailing how they could bring their location back into compliance. By March 2021, 15 of the 23 noncompliant items had been properly asset-tagged. And 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 undertake a policy review, with the goal of further strengthening internal inventory controls. The OIG suggested that any revised policy should include standardized procedures that govern how Park District locations (1) monitor all purchased items that require asset tags, including high-risk items; and (2) notify Facilities Management upon receipt of new items that fall under the Asset-Management Policy. Property inspectors should then be responsible for affixing asset tags before, or at the time of, any new item's receipt, and recording the Park District location where any new item is located. A revised policy should also include a deadline by which all newly purchased items that fall under the Asset-Management Policy must be properly inventoried and asset-tagged. And if an asset-tagged item is transferred from one Park District location to another, a revised policy should require personnel at the new location to immediately document the item in that location's inventory records. Finally, the OIG recommended that the Park District's property supervisor, property inspectors, area managers, and park supervisors undergo training on the new policy on a regular basis.

The OIG will report the Park District's response, if any, in a subsequent report.

THE OIG'S AUDIT DEPARTMENT GUARDED AGAINST ELECTION IMPROPRIETY AT HUMBOLDT PARK'S ADVISORY COUNCIL ELECTIONS

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 own bylaws, along with the Park District's Advisory Guidelines for Park Advisory Councils (PACs). Consequently, the Park District invalidated the election results. Shortly thereafter, a second election was scheduled to take place in April 2020. But because of restrictions that were imposed in response to the ongoing Covid-19 pandemic, the election was postponed until May 2021.

The OIG's Audit Department agreed to observe the May 2021 election in person. Specifically, the Audit Director provided the following oversight functions:

- If a dispute arose as to whether a potential candidate was eligible to stand for election, the Audit Director would verify whether that individual was, in fact, an eligible candidate;
- If a disagreement arose as to whether an individual was eligible to vote in the election, the Audit Director would verify whether the individual was, in fact, eligible; and
- After voting concluded, the Audit Director would oversee the vote-tabulation process and verify that it was conducted properly.

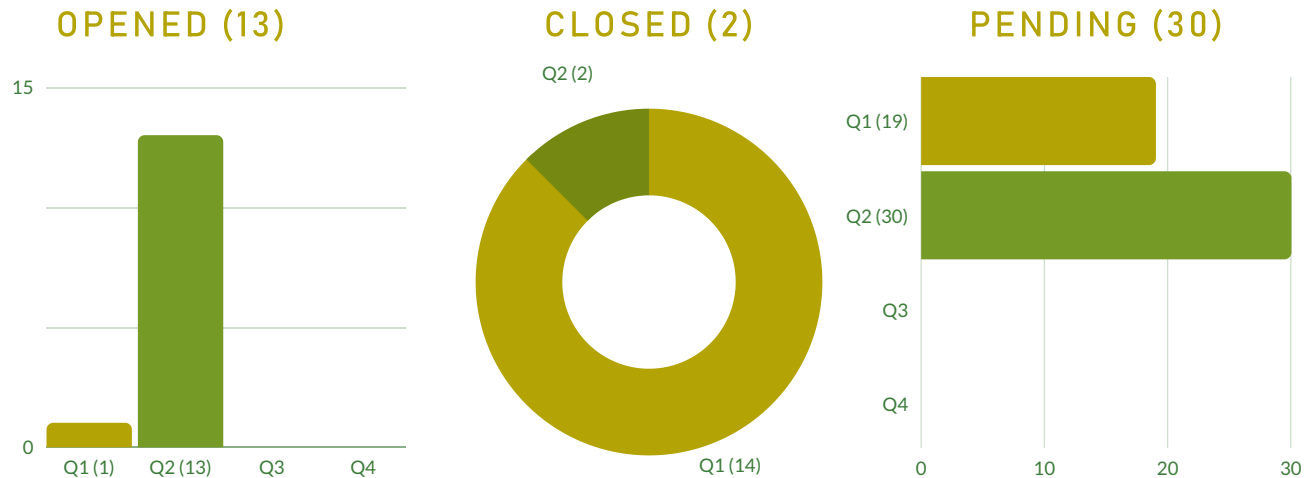
Based on the Audit Director's observations and review of the elections' outcomes, only eligible members stood for election, all individuals who voted were eligible to do so, and the tabulations were conducted properly. Moreover, all of the resulting vote counts were accurate.

In addition, the Audit Department and Park District concluded that the election was conducted according to the PAC's bylaws and the Park District's Advisory Council Guidelines.

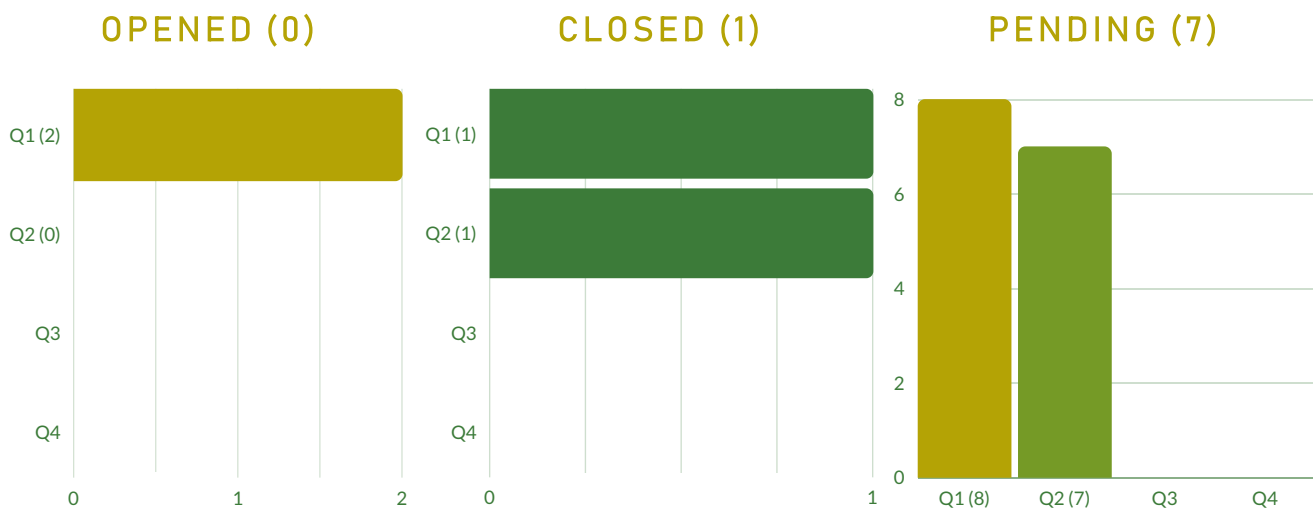
As a result, the elections were deemed valid. The members of the Humboldt Park Advisory Council accepted the election results and have agreed to an orderly transfer of power.

Quarterly Information

INVESTIGATIONS

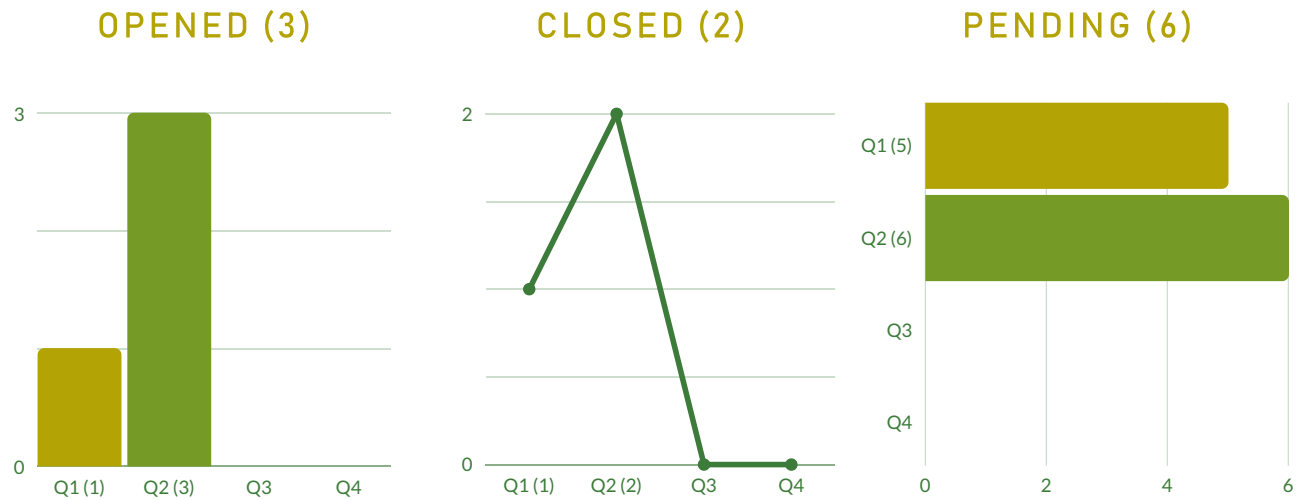


REVIEWS



Pending matters include carry-over from 2019-2020. Closed matters include cases that were merged due to similar subject matter and/or allegations.

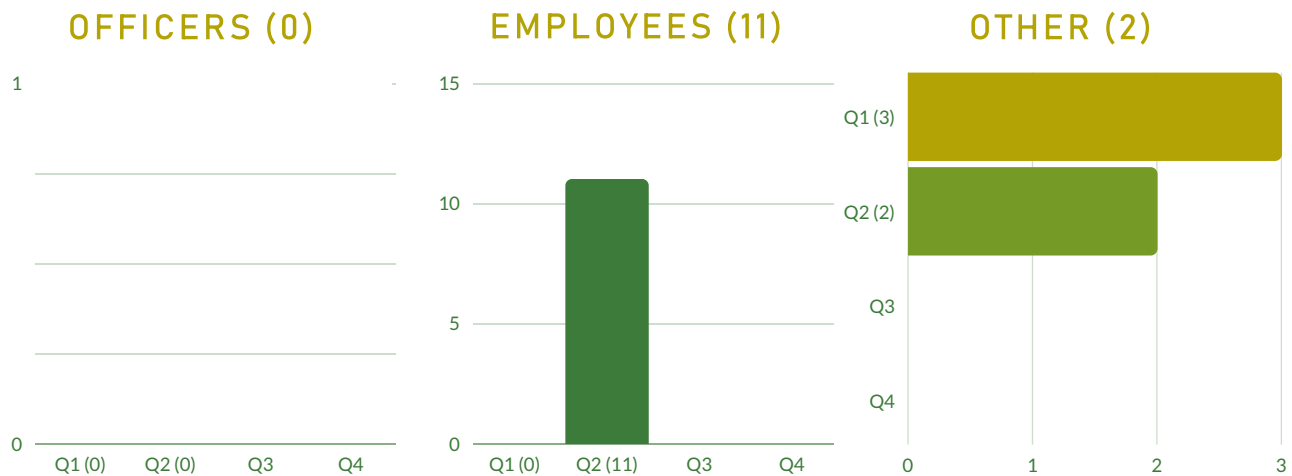
AUDITS



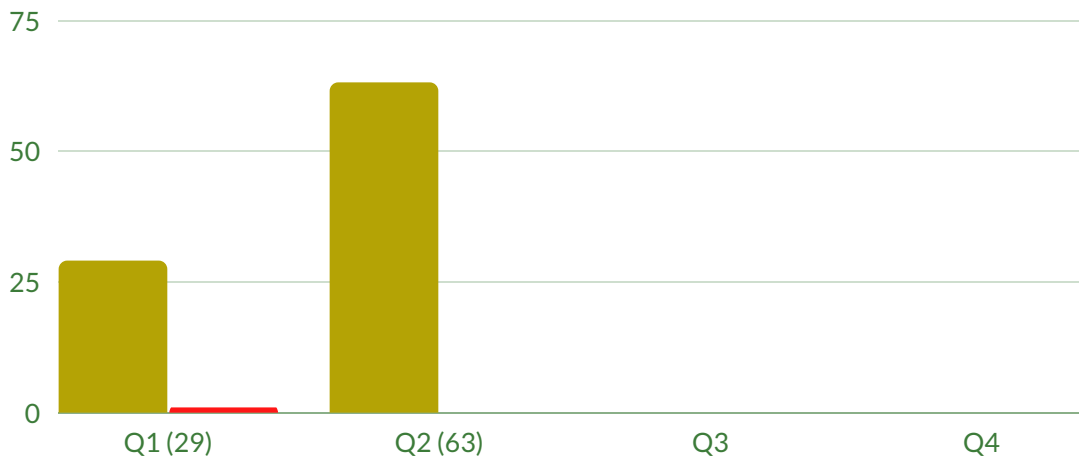
TYPES OF INVESTIGATIONS AND REVIEWS



INVESTIGATED AND REVIEWED PARTIES



COMPLAINTS RECEIVED



Other includes Agents, Concessionaires, Contractors, and Unknown Parties.

As depicted above in the color red, in First Quarter of 2021, the OIG referred one Covid-19 related complaint to the Park District's Department of Risk Management.

Due to Covid-19, the OIG did not complete any Hiring Compliance Audits or Reviews.

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. The OIG performed one Internal Assist for the Department of Human Resources and has no External Assists to report for the Second Quarter of 2021.

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

CASE NUMBER	MATTER TYPE	NATURE OF ALLEGATION	REASON
19-Q1-0206-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
19-Q2-0147-AI	ADMINISTRATIVE INVESTIGATION	CRIMINAL MISCONDUCT OR FRAUD	AVAILABLE TIME AND RESOURCES
19-Q2-0150-R	OIG REVIEW	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
19-Q2-0199-R	OIG REVIEW	COMPLIANCE	AVAILABLE TIME AND RESOURCES
19-Q2-0218-R	OIG REVIEW	COMPLIANCE	AVAILABLE TIME AND RESOURCES
19-Q2-0224-R	OIG REVIEW	COMPLIANCE	AVAILABLE TIME AND RESOURCES
19-Q3-0339-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
19-Q3-0343-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
19-Q4-0365-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
19-Q4-0373-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
19-Q4-0388-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
20-Q1-0004-R	OIG REVIEW	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
20-Q1-0042-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
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
20-Q2-0035-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
20-Q2-0072-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
20-Q2-0091-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
20-Q3-0134-R	OIG REVIEW	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
20-Q3-0170-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
20-Q3-0179-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES
20-Q3-0185-AI	ADMINISTRATIVE INVESTIGATION	CRIMINAL MISCONDUCT OR FRAUD	AVAILABLE TIME AND RESOURCES
20-Q4-0238-AI	ADMINISTRATIVE INVESTIGATION	OTHER RULE, CODE, ORDINANCE VIOLATIONS	AVAILABLE TIME AND RESOURCES

Hiring Compliance Monitoring Activity

Second Quarter 2021

The OIG reviews and monitors the Park District's hiring and assignment determinations from the quarter to ensure that the actions comply with the Employment Plan. The OIG reports on its compliance-monitoring activities in each of its quarterly reports.

Monitoring Contacts by Hiring Departments

The 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 Second Quarter of 2021. Since the OIG started reporting the Park District's hiring-compliance-monitoring activity, Human Resources 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 Second Quarter:

Positions added to the Exempt List (0)

Positions removed from the Exempt List (0)

Review of Exempt Management Hires

Human Resources reported one Exempt hire during the Second Quarter of 2021:

- Park Operations Manager (1)

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. Human Resources did not submit any "no consensus" letters during the Second 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.

Human Resources reported no emergency appointments during the Second Quarter of 2021. Human Resources 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. Human Resources did not report any arbitrations or grievances during the Second Quarter of 2021.

Hiring Sequence Audits

The OIG's Hiring Sequence Audit reporting will resume later in 2021.

Other Hiring Compliance Activity

During the Second Quarter of 2021, the OIG monitored a mass processing of potential candidates for Junior Laborer and Attendant Seasonal positions. There were no Shakman or other compliance issues detected.

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 Second Quarter of 2021 showed that, on 143 instances, employees had “acted up,” and five instances where employees who had been in “acting up” status were placed back in their positions.

"Acting Up" Activity - Second Quarter of 2021

