

Office of Inspector General
Chicago Park District
Will Fletcher, Inspector General

2016 FIRST QUARTER REPORT

Greetings,

I am pleased to present the Park District OIG's first quarterly report of 2016. Attached are summaries of the quarter's significant investigations and hiring compliance activities.

In the first quarter of 2016, the OIG hired an Assistant Compliance Officer to coordinate our employment monitoring duties under the Park District's Employment Plan. We also adopted an internal policy for more efficient deployment of Park District vehicles assigned to the OIG.

The OIG's goals for the second quarter of 2016 include the addition of a full-time investigator. We will also seek to acquire separate office space to further promote the OIG's mission of independence, bring our office into structural alignment with its peer agencies in Chicago, and strengthen the efficiency and quality of our operations.

Please contact our office at 312-742-3333 with any information relating to fraud, waste, abuse or inefficiency within the Chicago Park District.

Sincerely,

Will Fletcher
Inspector General

I. INVESTIGATIONS

A. REVIEW OF ALLEGATIONS MADE BY A PARK ADVISORY COUNCIL

In January 2016, a Chicago newspaper published an article in which members of a park advisory council made various claims against the Park District and the management at one of its parks. The council has donated funds to the park to pay for program fees for youth patrons who could not otherwise afford to pay. In the article, members of the council claimed that the Park District was “missing” a number of registration receipts that would account for the park’s expenditure of the donations. The members asserted that the Park District had pledged to give copies of the receipts to the council but had yet to do so. The article also reported that youth patrons had been turned away from the park for their inability to pay for program fees even though donated funds were available.

The investigation found no evidence that the Park District handled the council’s donations in a manner that was less than transparent, against the Park District’s rules and procedures, or inconsistent with the goal of the council’s donations. Further, there was no evidence that young patrons were denied from participating in the park’s programs because they could not afford the fees.

Contrary to claims made in the newspaper article, there was no evidence that the Park District stated that it would provide or that it had ever provided the council with copies of patron registration receipts as proof of how donations were spent. Instead, the Park District had historically given the council only summaries of its expenditures of donated funds. Therefore, the investigation showed that any implication that the Park District was “missing” certain receipts, simply because copies had not been provided to the council, was inaccurate.

The investigation also reflected that, with respect to the individual park advisory council at issue, the Park District has not enforced the provisions of the Park Advisory Council Guidelines despite indications that the council was not in full compliance with the Guidelines.

The OIG recommended that the Park District:

- Review of the council’s compliance with the Park Advisory Guidelines. Such a review would include an accounting of the council’s fundraising and fiscal management history; and
- Consider the appropriateness of providing the council with more detailed information about the expenditure of its donations (short of giving the council copies of individual patron receipts). In 2013, the Park District discontinued

the practice of giving the council the names of the participants who enrolled in the programs with the assistance of the council's donations, citing privacy concerns. The council has argued that, since that time, it has received insufficient information about how its donations were used. The council's point was arguable as the Park District always continued to provide the council with some enrollment data connected to the donations. However, the OIG recommended that management review the feasibility of providing more detailed information without compromising the personal information of youth patrons.

The Park District's responses to the recommendations are pending.

B. INAPPROPRIATE CONDUCT BY A PARK DISTRICT EMPLOYEE

An OIG investigation found that an off-duty Park District employee demonstrated inappropriate conduct when addressing a Park District lifeguard at a beach during the summer of 2015. The lifeguard immediately reported the incident to his/her supervisor and the Park District reviewed the allegations.

While the investigation was ongoing, the off-duty employee left Park District employment for other reasons. The OIG recommended that a copy of its report be placed in the employee's file in the event the employee applied for a position with the Park District in the future. The Park District followed the OIG's recommendation.

C. PREFERENTIAL TREATMENT AT WINTER PROGRAM REGISTRATION BY TWO EMPLOYEES OF A THIRD-PARTY OPERATOR

An OIG investigation found that two employees of a third-party operator of the Park District gave preferential treatment to a friend of one of the employees during open registration for the Winter 2016 season. While other patrons had waited several hours for class registration to open, the two employees arranged to have the friend arrive and be escorted to the front of the line just minutes before registration began. In doing so, the friend was one of the first patrons served although he/she had not waited in line like the others had done.

The two employees admitted to giving the friend preferential treatment. One of the employees stated that, had he/she known that escorting the friend to the front of the line would cause complaints, he/she would have removed a class seat from open registration altogether and given it to the friend. The other employee stated that he/she couldn't believe that anyone complained about what had happened, either.

The OIG recommended that the third-party operator take appropriate actions to ensure that employees who play direct or indirect roles in the administration of class

registrations do so fairly, in accordance with its rules, and without regard to personal relationships. In response, the third-party operator apologized for the incident and pledged to continue to educate and train its staff on the applicable policies and procedures. The operator also indicated that it would move more class offerings to online registration. Finally, the employee whose friend received preferential treatment apologized for the incident.

D. EMPLOYEE'S INDEBTEDNESS TO THE CITY

An OIG investigation discovered that a Chicago Park District Attendant had 18 unpaid tickets for parking and moving violations totaling approximately \$1,800. The earliest of the 18 tickets was issued on December 20, 2015 and the most recent was dated February 26, 2016.

The OIG recommended that the Park District:

- Take whatever disciplinary and/or remedial measures it found appropriate for the employee; and
- Monitor the employee's payment of the indebtedness to the City.

The Park District has indicated that it will follow the recommendations.

E. EMPLOYEE'S UNDISCLOSED FELONY CONVICTIONS

An OIG investigation into an unrelated matter discovered that a Park District employee had two undisclosed felony convictions while he/she was working for the Park District. The OIG reported the employee's convictions to management in April 2016 and recommended that it take whatever disciplinary measures the Park District considered appropriate.

The Park District's response to the recommendation is pending.

F. INVENTORY CHECKS OF GAME CONSOLES AT TWO PLAYGROUND PARKS

The OIG conducted inventory checks at two Park District playground parks. Specifically, the OIG sought to confirm that Sony PlayStation 4 gaming consoles were on site at each location. Park District purchasing records indicated that one console was bought for each of the parks.

The inventory checks confirmed that the gaming consoles were at the parks and kept in secure locations. Neither of the consoles, however, had been asset-tagged as Park District property. The supervisors at each of the playgrounds told the OIG that they were relatively new in their roles and were not familiar with the process of having Park District property asset-tagged.

After the OIG’s checks at the playgrounds, the supervisors promptly made arrangements with Facility Management to have the consoles as well as other property asset-tagged.

The OIG recommended that the Park District review its training of park supervisors to ensure that they are instructed to have valuable Park District property asset-tagged by the Facility Management team. The Park District has indicated that it will follow the recommendation.

II. 2016 INVESTIGATIONS INFORMATION

Investigations Caseload by Quarter

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Cases Initiated	73				
Investigations Completed	66				
Cases Pending	33♦				

♦ Includes carry-over from previous quarter.

Nature of Allegations

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Abuse of Position	1				
Criminal Misconduct or Theft	3				
Discourteous Treatment	1				
Fraud	4				
Improper Political Activity	1				
Misuse of Park District Property	1				
Preferential Treatment	1				
Rule or Ordinance Violation	52				
Waste or Inefficiency	1				
Other (reviews, assists, verifications)	8				

Method of Contact for Investigations Initiated

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Hotline telephone	5				
Hotline email	4				
OIG-initiated	58				
Walk-in	6				

Investigated Parties

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	2016 Total
Agents/Contractors	2				
Employees	68				
Officers/Managers	0				
Patrons	1				
Reviews/Inventory Checks	2				
Unknown Parties	0				
Other	0				

Cases Pending Over Six Months

Four

Reason

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

On Hold. Case held not to interfere with another ongoing investigation: 1

III. COMPLIANCE MONITORING ACTIVITY — FIRST QUARTER 2016

Under the Chicago Park District Employment Plan, the OIG reviews and monitors various aspects of the Park District’s hiring and assignment activities. The OIG reports on its compliance monitoring activities in each its quarterly reports.

A. HIRING OVERSIGHT INVESTIGATIONS

The OIG initiated and completed one hiring oversight investigation during the first quarter of 2016:

- The OIG investigated an allegation that a February 2015 job posting for a year-round engineer position was rigged to favor the applicant who was eventually awarded the job. The investigation concluded that there was no evidence of favoritism or that the hiring process for the position was flawed.

The candidate who was hired received “priority consideration” during the hiring process because of prior service as a seasonal employee for a certain number of months. The “priority consideration” criteria were expressly provided for in the applicable collective bargaining agreement. Therefore, what the complainant alleged was unfair preferential treatment was, in fact, a contractual provision that gave candidates with certain experience priority consideration when full-time employment opportunities became available.

Had the candidate with “priority consideration” not been offered the position, it would have been opened to the general candidate pool, which included the complainant.

B. 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 contacts by hiring departments for the first quarter of 2016.

1. Review of Exempt List Modifications

The OIG reviews the Park District's adherence to exemption requirements and modifications to the list of positions that are Exempt from the Employment Plan procedures:

The following positions were **added** to the Exempt list in the first quarter of 2016:

- Director of Revenue
- Deputy Director of Revenue
- Assistant Director of Revenue

The following position was **removed** from the Exempt list in the first quarter of 2016:

- Director of Park Services

2. Review of Exempt Management Hires

The Park District placed employees in the following Exempt positions during the first quarter of 2016:

1. An employee was promoted to Chief Program Officer
2. An employee was promoted to Chief Administrative Officer
3. An employee was promoted to Director of Purchases
4. An employee was promoted to Director of Revenue
5. An employee was promoted to Deputy Director of Human Resources
6. An employee was promoted to Treasurer
7. An employee was promoted to Region Manager – South Region
8. Two employees were promoted to Area Manager – South Region
9. Two employees were promoted to Area Manager – Central Region
10. One employee was promoted to Area Manager – North Region

3. 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.

The OIG did not receive any “no consensus” letters during the first quarter of 2016.

4. 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.

There were no emergency appointments in the first quarter of 2016.

5. Review of “Acting Up” Activity

The 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).

The Park District reported the following instances of employees “acting up” through the end of the first quarter of 2016:

- 25 employees “acting up” from Laborer to Labor Foreman.

C. COMPLIANCE MONITORING — AUDITS

1. Review of Notices of Job Opportunities

The OIG audits modifications to minimum requirements and screening and hiring criteria and modifications of class specifications, minimum requirements, or screening and hiring criteria.

During the first quarter of 2016, the OIG noted no compliance issues with the minimum requirements and other criteria related to posting of Notices and Job Opportunities.

2. Review of Qualified Applicants/Bidders Lists

The OIG audits the lists of applicants/bidders who meet the predetermined minimum qualifications for the position (as generated by Human Resources). For the first quarter of 2016, the OIG’s review of the lists of applicants/bidders for positions revealed no significant issues.

3. Review of Candidate Testing

No activity in the first quarter of 2016.

4. Review and Monitoring of Hiring Sequences

The OIG randomly monitored several hiring sequences in the first quarter of 2016 for the following positions:

- Arts Instructor
- Attendant
- Boxing Instructor
- Early Childhood Instructor
- Junior Tree Surgeon
- Laborer
- Labor Foreman
- Park Supervisor (3x)
- Physical Instructor
- Playground Supervisor
- Program Event Facilitator
- Program Specialist
- Project Manager
- Recreational Leader (2x)

The OIG's monitoring revealed no significant issues in the candidate selection and interview processes.

5. Arbitrations and Grievances

The OIG audits all arbitration and grievances involving hiring, promotions, transfers or involving allegations of unlawful political discrimination.

The Park District did not report any arbitrations or grievances in the first quarter of 2016.