

**33876**

RECEIVED AND PLACED ON FILE – BOARD OF TRUSTEES  
COMMUNITY COLLEGE DISTRICT NO. 508  
NOVEMBER 7, 2019

# Office of the Inspector General City Colleges of Chicago

## Presentation to the Board of Trustees

November 7, 2019



**CITY COLLEGES**  
*of* CHICAGO  
Education that Works

## Powers and Duties of the OIG (Article 2.7.2 of the Board Bylaws)

*The Inspector General shall have the authority to conduct investigations regarding waste, fraud and misconduct by any officer, employee, or member of the Board; any contractor, subcontractor, consultant or agent providing or seeking to provide goods or services to the City Colleges of Chicago; and any program administered or funded by the District or Colleges.*

# Subject Matter of Complaints Received (FY18 and FY19)

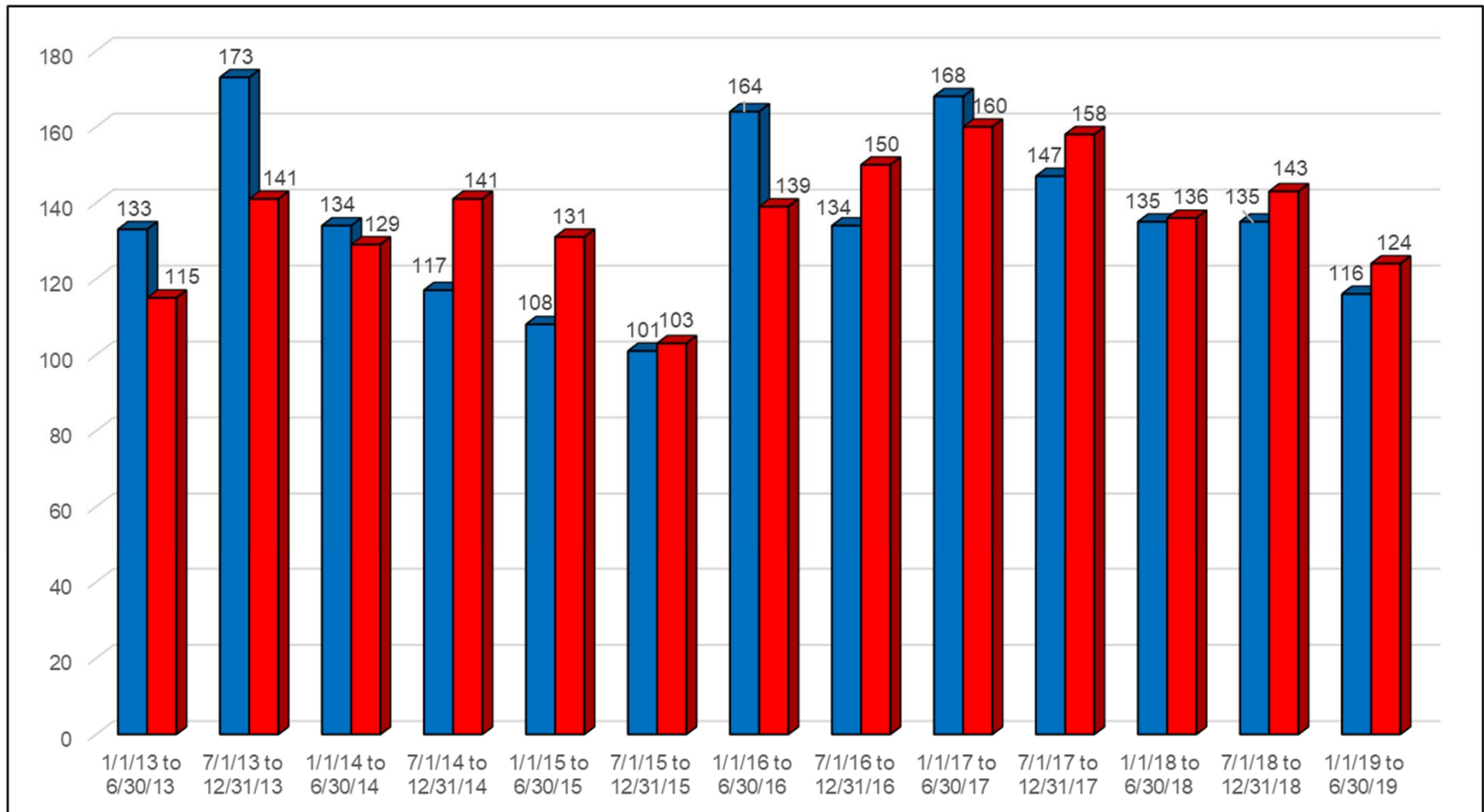
Subject Matter (Allegation)	FY 18		FY 19	
	Number	Percentage	Number	Percentage
Failure to maintain prerequisites of the position	3	1.06%	0	0.00%
Inappropriate use of sick leave	6	2.13%	0	0.00%
Use of CCC property for unauthorized purposes	2	0.71%	1	0.40%
Violation of one's collective bargaining agreement	4	1.42%	1	0.40%
Waste of Funds	3	1.06%	2	0.80%
OIG initiated reviews	4	1.42%	2	0.80%
Violation of Outside Employment Policy	4	1.42%	3	1.20%
Engaging in conduct in violation of the Illinois Compiled Statutes	6	2.13%	4	1.59%
Failure to maintain confidentiality of CCC employment records	0	0.00%	6	2.39%
Falsification of employment records	1	0.35%	6	2.39%
Violation of the Acceptable Computer Use Policy	2	0.71%	6	2.39%
Incompetence in the performance of the position	12	4.26%	7	2.79%
Fraud (including financial aid or tuition)	15	5.32%	8	3.19%
Conduct unbecoming a public employee	6	2.13%	11	4.38%
Giving preferential treatment	8	2.84%	11	4.38%
Misappropriation of funds / Theft	13	4.61%	12	4.78%
Discourteous Treatment	17	6.03%	13	5.18%
Violation of Miscellaneous CCC Policies	8	2.84%	18	7.17%
Residency	29	10.28%	18	7.17%
Violation of CCC Ethics Policy	13	4.61%	23	9.16%
Sexual or other harassment / discrimination / retaliation	45	15.96%	29	11.55%
Inattention to duty	41	14.54%	33	13.15%
Falsification of attendance records	40	14.18%	37	14.74%
<b>Totals</b>	<b>282</b>	<b>100.00%</b>	<b>251</b>	<b>100.00%</b>

# How Are Complaints Received?

Method	FY18	FY19
	Total Received	Total Received
Email	185	192
Telephone	51	27
OIG Initiated	28	20
Mail	5	8
In Person	11	4
Media Report	2	0
<b>Totals</b>	<b>282</b>	<b>251</b>

# Complaints

Received (blue) and Closed (red) through FY19



<b>Reason Closed</b>	<b>FY18</b>	<b>FY19</b>
Sustained	28	30
Not Sustained / No Policy Violation	100	69
Review with Recommendations	1	2
Board Mandated Audit Completed	1	1
Referred / Deferred	88	99
Subject Inactive	24	12
Duplicate Complaint	29	36
Complaint included with another active investigation	19	10
Other	4	8
<b>Totals</b>	<b>294</b>	<b>267</b>

## Subject Matter of Reports Submitted as reported in the Bi-Annual Reports for FY19

Primary Finding / Type	Reports Submitted
Board Mandated Audit	1
Not Sustained (Theft) w/ Recommendations	1
Waste of Funds	1
Excessive Tardiness	1
Giving Preferential Treatment	1
Conduct Unbecoming a CCC Employee	1
Misuse of Sick Leave	1
Falsification of Employment Records	1
OIG Initiated Review	2
Unauthorized Possession/Use of CCC Property	2
Ethics Violation	3
Engaging in conduct contrary to IL Compiled Statutes	3
Residency	4
Falsification of Attendance Records	4
Violation of Computer Use Policy	8
<b>Totals</b>	<b>34</b>

# Implementation of OIG Disciplinary Recommendations

<b>Category</b>	<b>FY18</b>	<b>FY19</b>	<b>Totals</b>
Total OIG Disciplinary Recommendations	25	33	58
Total Completed	25	33	58
<b>% Completed</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
Pending	0	0	0
<b>% Pending</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
Total OIG Disciplinary Recommendations Implemented	25	33	58
<b>% Implemented</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
Total OIG Disciplinary Recommendations Not Followed	0	0	0
<b>% Not Followed</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>



# Disciplinary Action Taken (FY19)

<b>Action Taken</b>	<b>Number</b>
Termination	4
Resignation / Retirement	15
Other (Suspension, Reprimand, etc.)	12
Debarment (vendors)	2
<b>Total Action Taken</b>	<b>33</b>
Total Outstanding	0
Total No Action Taken	0
Total Other Action Taken	0
<b>Total Recommendations</b>	<b>33</b>

# Policy-related Recommendations in FY19

## ❖ 19 Recommendations

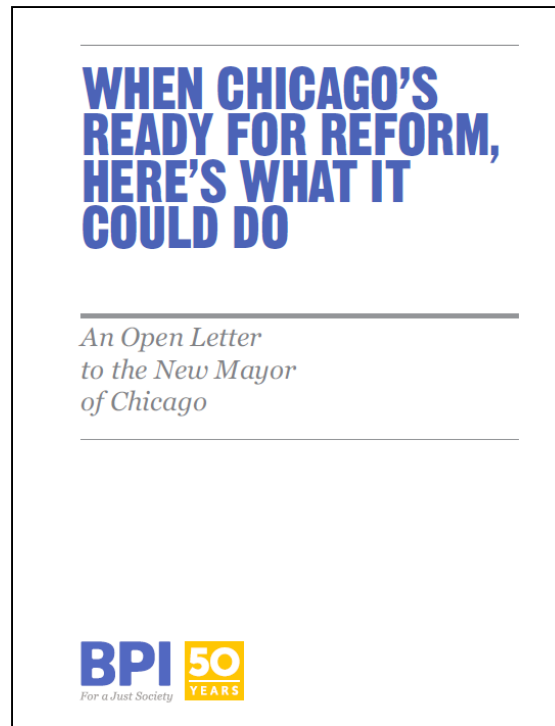
- Business Office procedures
- Ethics Policy
- Academic and Student Policy (Section 3.08)
- Procurement policies and procedures
- HR-related policies and procedures
- Fleet Management Manual

## Other Results

- ❖ Two recoupment recommendations in FY19
  - \$668.32 collected
  
- ❖ Recovery of CCC property in FY19
  - 3 laptops
  - 2 iPads

# Business and Professional People for the Public Interest (“BPI”)

## Review of Offices of Inspector General - April 2019



<https://www.bpichicago.org/wp-content/uploads/2019/04/BPI-OPEN-LETTER-NEW-MAYOR-4-4-19.pdf>

# BPI's Categories of Review

- ✓ Independence
- ✓ Jurisdiction
- ✓ Powers
- ✓ Collaboration
- ✓ Host Agency Responsibility

❖ See Article 2.7 et seq. of the Board Bylaws

# Comparison of Sister Agency OIGs

OIG Office	Total Personnel	Budget	Year
Chicago Park District	4	\$403,111.00	2019
City Colleges of Chicago	7	\$788,791.31	FY20
Chicago Housing Authority	9	\$1,455,376.00	FY19
Chicago Board of Education	49	\$5,949,405.00	2020
City of Chicago	106	\$9,738,316.00	2019

# Independence

BPI Recommendation		Does CCC OIG Bylaw Include?	Bylaws Citation	Comments
Category	Type			
Independence	Qualifications	No	--	See job description
	Appointment Process, including independent voices	Partial	2.7.1(b)	Recommendation by Chancellor and approval by Board
	Term of Office	Yes	2.7.1(b)	4 year term
	Termination for cause with hearing	Partial	2.7.1(b)	For cause, in writing. No hearing.
	Management	Yes	2.7.1(a)	--
	Budget (floor)	No	--	Current CCC OIG budget = .18% / City = .14%

# Jurisdiction

<b>BPI Recommendation</b>		<b>Does CCC OIG Bylaw Include?</b>	<b>Bylaws Citation</b>	<b>Comments</b>
<b>Category</b>	<b>Type</b>			
Jurisdiction	Jurisdiction over all persons involved in agency, including vendors	Yes	2.7.2	--



# Powers

BPI Recommendation		Does CCC OIG Bylaw Include?	Bylaws Citation	Comments
Category	Type			
Investigative Powers	Power to investigate all complaints, including anonymous complaints and to initiate own investigations	Yes	2.7.(c)	--
	Power to issue and enforce subpoenas with counsel of IG's choosing	No	--	Requires state statute
	Power to take testimony under oath	No		--
	Power to refer matters to and participate in investigations with law enforcement	Yes	2.7.3(2) and (3)	--
	Contract Monitoring, including authority to place IG staff on management team of large projects	Partial	2.7.2	--

# Powers

BPI Recommendation		Does CCC OIG Bylaw Include?	Bylaws Citation	Comments
Category	Type			
Audit Powers	Power to audit	Yes	2.7.2c	--
Review Powers	Power to review disclosure statements	Yes	--	To the extent CCC has disclosures for outside employment, etc.
Review Powers	Power to conduct background review of senior hires	No	--	--
Reporting Powers	Power to report directly to the public	Yes	--	Bi-Annual reports are placed on website

# Collaboration

<b>BPI Recommendation</b>		<b>Does CCC OIG Bylaw Include?</b>	<b>Bylaws Citation</b>	<b>Comments</b>
<b>Category</b>	<b>Type</b>			
Collaboration	IGs should work collaboratively	Yes	2.7.3(4)	--

# Host Agency Responsibilities

BPI Recommendation		Does CCC OIG Bylaw Include?	Bylaws Citation	Comments
Category	Type			
Host Agency Responsibilities	Access to all records	Yes	2.7.2 (e) / 2.7.4(a)	--
	Duty to Cooperate	Yes	2.7.4(b)	--
	Duty to report wrongdoing by employees and vendors	Partial	--	But see IV(46) of CCC District-Wide Employee Manual (employees' duty)