To: Cheryl L. Hyman, Chancellor  
Ellen Alberding, Vice-Chairperson of the Board of Trustees  
Larry R. Rogers, Sr., Secretary of the Board of Trustees  
Pastor Charles Jenkins, Trustee  
Marisela Lawson, Trustee  
Everett Rand, Trustee  
Paula Wolff, Trustee  
Ashley N. Turner, Student Trustee

From: John A. Gasiorowski, Inspector General

Date: February 7, 2012

RE: OIG Bi-Annual Report for the period of July 1, 2011 through December 31, 2011

This Bi-Annual Report is being provided to the Chancellor and the Board of Trustees of Community College District No. 508 pursuant to Section 2.7.5 of the Bylaws of the Board of Trustees. Pursuant to Section 2.7.5, the Bi-Annual Report for the period of July 1st through December 31st is required no later than March 1st each year. This is the third Bi-Annual Report submitted pursuant to the amendments to Section 2.6 et seq. of the Board Rules for Management and Government adopted by the Board of Trustees on July 14, 2010 and subsequently included as Section 2.7 et seq. of the Bylaws of the Board of Trustees effective December 1, 2011.

Section 2.7.2 of the Bylaws of the Board of Trustees authorizes the Office of the Inspector General ("OIG") for the City Colleges of Chicago 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. This Bi-Annual Report is a summary of investigations and audits which resulted in sustained findings of waste, fraud, or misconduct and/or resulted in reports submitted by the OIG with recommendations for the period of July 1, 2011 through December 31, 2011.

The OIG would like to thank the Chancellor, the Board of Trustees and the administration of the City Colleges of Chicago for their cooperation and support.
Mission of the Office of the Inspector General

The Office of the Inspector General (“OIG”) of the City Colleges of Chicago (“CCC”) helps fuel CCC’s drive towards increased student success by promoting economy, efficiency, effectiveness and integrity in the administration of the programs and operations of CCC by conducting fair, independent, accurate, and thorough investigations into allegations of waste, fraud and misconduct, as well as by reviewing CCC programs and operations and recommending policies and methods for the elimination of inefficiencies and waste and for the prevention of misconduct.

The OIG should be considered a success when students, faculty, staff, administrators and the public:

- perceive the OIG as a place where they can submit their complaints / concerns in a confidential and independent setting;
- trust that a fair, independent, accurate, and thorough investigation will be conducted and that the findings and recommendations made by the OIG are objective and consistent; and
- expect that the OIG’s findings will be carefully considered by CCC administration and that the OIG’s recommendations will be implemented when objectively appropriate.

New Developments

During the current reporting period (July 1, 2011 to December 31, 2011), the OIG hired an Investigator I. With this hire, the OIG currently has nine employees, specifically, two supervising investigators, two Investigator III’s, two Investigator II’s, the Investigator I, a staff assistant, and the Inspector General.

In order to provide greater awareness of the existence and function of the OIG, the OIG met with various faculty and student groups. The OIG also created a poster reflecting the various methods in which an individual who has information regarding waste, fraud or misconduct can contact the OIG. Copies of the poster were provided to each of the Colleges as well as the District Office. The OIG requested that the posters be hung in areas frequented by faculty, staff, and students. The OIG poster is reproduced on the final page of this report.
Updates to Investigations Documented in Previous Bi-Annual Reports

In the Bi-Annual Report submitted for the January 1, 2011 to June 30, 2011 reporting period, the OIG submitted sixteen reports documenting nineteen investigations which resulted in sustained findings of waste, fraud and misconduct. At the time the Bi-Annual Report was submitted, disciplinary action was still pending regarding several of the investigations. The following table updates the status of the disciplinary action recommended by the OIG and the action taken by the City Colleges of Chicago.

<table>
<thead>
<tr>
<th>Case Number</th>
<th>Subject</th>
<th>Recommended Disciplinary Action</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>11-0035</td>
<td>Security Officer</td>
<td>Termination</td>
<td>Resignation</td>
</tr>
<tr>
<td>11-0035</td>
<td>Supervisor</td>
<td>Demotion</td>
<td>None</td>
</tr>
<tr>
<td>11-0059</td>
<td>Full-Time Faculty</td>
<td>Termination</td>
<td>None</td>
</tr>
<tr>
<td>11-0078</td>
<td>Janitor</td>
<td>Termination</td>
<td>Termination</td>
</tr>
<tr>
<td>11-0030</td>
<td>Security Director</td>
<td>Appropriate Disciplinary Action</td>
<td>None</td>
</tr>
<tr>
<td>11-0030</td>
<td>Security Officer</td>
<td>Transfer</td>
<td>Transfer</td>
</tr>
<tr>
<td>11-0077</td>
<td>Security Officer</td>
<td>Appropriate Disciplinary Action</td>
<td>Reclassification / One Week Suspension</td>
</tr>
<tr>
<td>11-0090</td>
<td>Director</td>
<td>Appropriate Disciplinary Action</td>
<td>Written Reprimand</td>
</tr>
<tr>
<td>11-0015</td>
<td>Janitor</td>
<td>Termination</td>
<td>Termination</td>
</tr>
<tr>
<td>11-0087</td>
<td>Adult Educator</td>
<td>Termination</td>
<td>Termination</td>
</tr>
<tr>
<td>11-0058</td>
<td>Vendor</td>
<td>Permanent Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0058</td>
<td>Principal</td>
<td>Permanent Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0069</td>
<td>Vendor</td>
<td>Permanent Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0069</td>
<td>Principal</td>
<td>Permanent Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0071</td>
<td>Vendor</td>
<td>Permanent Debarment</td>
<td>Voluntary Debarment</td>
</tr>
<tr>
<td>11-0071</td>
<td>Principal</td>
<td>Permanent Debarment</td>
<td>Voluntary Debarment</td>
</tr>
<tr>
<td>11-0072</td>
<td>Vendor</td>
<td>3 year Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0072</td>
<td>Principal</td>
<td>3 year Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0073</td>
<td>Vendor</td>
<td>3 year Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0073</td>
<td>Principal</td>
<td>3 year Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0102</td>
<td>Vendor</td>
<td>3 year Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0102</td>
<td>Principal</td>
<td>3 year Debarment</td>
<td>Pending</td>
</tr>
<tr>
<td>11-0108</td>
<td>Vendor</td>
<td>3 year Debarment</td>
<td>Voluntary Debarment</td>
</tr>
<tr>
<td>11-0108</td>
<td>Principal</td>
<td>3 year Debarment</td>
<td>Voluntary Debarment</td>
</tr>
<tr>
<td>11-0043</td>
<td>Janitor</td>
<td>Termination</td>
<td>Termination</td>
</tr>
<tr>
<td>11-0025</td>
<td>Faculty Member</td>
<td>Reconsider one day suspension</td>
<td>Suspension rescinded / Written reprimand issued</td>
</tr>
<tr>
<td>11-0008</td>
<td>Clerical Supervisor</td>
<td>Appropriate Disciplinary Action</td>
<td>One Day Suspension</td>
</tr>
<tr>
<td>11-0008</td>
<td>Instructor</td>
<td>Appropriate Disciplinary Action</td>
<td>Retirement</td>
</tr>
<tr>
<td>11-0113</td>
<td>Engineer</td>
<td>Appropriate Disciplinary Action</td>
<td>Termination</td>
</tr>
<tr>
<td>11-0113</td>
<td>Administrator</td>
<td>Appropriate Disciplinary Action</td>
<td>Written Reprimand</td>
</tr>
</tbody>
</table>

OIG Case Number 11-0034

As reported in the Bi-Annual Report submitted for the July 1, 2010 to December 31, 2010 reporting period, this OIG investigation revealed that a full-time faculty member at a City College fraudulently misrepresented her educational background. This caused her to be paid at a lane IV rate as opposed to a lane I rate since the time of her hire in August 1995, resulting in the employee receiving compensation totaling in excess of $307,000.00 to which she was not entitled.
On March 11, 2011, as a result of the OIG investigation, CCC filed a civil lawsuit in the Circuit Court of Cook County (case number 2011 L 002775) against the employee seeking to recoup the compensation that she received to which she was not entitled. On January 24, 2012, a default judgment in the amount of $307,102.57 was entered in the case against the employee in favor of CCC.

Complaints Received

For the period of July 1, 2011 through December 31, 2011, the OIG received one hundred complaints. These one hundred complaints include complaints forwarded to the OIG from outside sources as well as investigations (or audits / reviews) initiated based on the OIG’s own initiative. For purposes of comparison to the period of July 1, 2011 through December 31, 2011, the following table documents the complaints received by the OIG during previous periods.

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1 Under Section 2.7.2 of the Bylaws of the Board of Trustees, the powers and duties of the OIG include: c) To investigate and audit the conduct and performance of the District’s officers, employees, members of the Board, agents, and contractors, and the District’s functions and programs, either in response to a complaint or on the Inspector General’s own initiative, in order to detect and prevent waste, fraud, and abuse within the programs and operations of the District;....

2 The number of complaints received during each of the previous six month periods prior to July 1, 2010 is based on the number of investigative files initiated during each of those periods by previous Inspectors General.
The one hundred complaints received represent a variety of subject matters. The table below documents the subject matters of the complaints received.

<table>
<thead>
<tr>
<th>Subject Matter of Complaints Received / Initiated by the OIG</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fraud</td>
<td>2</td>
</tr>
<tr>
<td>Retaliation</td>
<td>2</td>
</tr>
<tr>
<td>Discrimination</td>
<td>3</td>
</tr>
<tr>
<td>Grade Tampering</td>
<td>3</td>
</tr>
<tr>
<td>Damage to / Use of CCC property for unauthorized purposes</td>
<td>4</td>
</tr>
<tr>
<td>Sexual or other Harassment</td>
<td>4</td>
</tr>
<tr>
<td>Falsification of Employment or Other Records</td>
<td>5</td>
</tr>
<tr>
<td>Reviews</td>
<td>5</td>
</tr>
<tr>
<td>Preferential Treatment</td>
<td>6</td>
</tr>
<tr>
<td>Ethics Violation</td>
<td>8</td>
</tr>
<tr>
<td>Misappropriation of Funds / Theft</td>
<td>10</td>
</tr>
<tr>
<td>Inattention to Duty</td>
<td>11</td>
</tr>
<tr>
<td>Falsification of Attendance Records</td>
<td>12</td>
</tr>
<tr>
<td>Residency</td>
<td>12</td>
</tr>
<tr>
<td>Other District-Wide Employee Manual Violations</td>
<td>13</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

**Status of Complaints**

As reported in the previous Bi-Annual Report, as of June 30, 2011, the OIG had seventy-three complaints that were pending, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of July 1, 2011 through December 31, 2011, the OIG closed eighty-three complaints. These complaints were closed for a variety of reasons, including the following: the complaint was sustained following an investigation or the review was completed with recommendations and a report was submitted; the complaint was not sustained following an investigation or no policy violation was found; the complaint was referred to the appropriate CCC department; and the subject of the complaint retired or resigned from CCC employment prior to or during the course of the investigation. The following chart categorizes the reasons that the OIG closed the eighty-three complaints during this reporting period.
As of December 31, 2011, the OIG had ninety pending complaints.

**OIG Reports Submitted – July 1, 2011 through December 31, 2011**

During the reporting period of July 1, 2011 through December 31, 2011, the OIG submitted eighteen reports.3 The vast majority of the reports submitted documented sustained findings of misconduct. One report documented the OIG’s review of CCC Procurement Card Use by the District Office. Another report documented the OIG’s review of off-campus Adult Education sites utilized by one of the City Colleges. Lastly, for reasons explained later in this Bi-Annual Report, one report documented the outcome of an investigation which resulted in a not sustained finding.

**Reports of Sustained Findings of Waste, Fraud and/or Misconduct**

Pursuant to the provisions of Section 2.7.5 of the Bylaws of the Board of Trustees, the following are summaries of the OIG investigations / reviews for which reports were submitted documenting sustained findings of waste, fraud or misconduct during the period of July 1, 2011 through December 31, 2011.

**OIG Case Number 11-0138**

The OIG conducted a review of the off-campus Adult Education sites utilized by a City College during the 2011 Summer semester. In all, the OIG reviewed fourteen off-campus sites which were in session during the 2011 Summer semester. The review included multiple visits to thirty-six classes at thirteen off-

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3 Pursuant to Section 2.7.3 of the Bylaws of the Board of Trustees, the Inspector General submits reports to the Chancellor, the Board Chairman, and the General Counsel at the conclusion of an investigation with recommendations for disciplinary or other action.
campus sites and one visit at an off-campus site prior to the cancellation of the classes at that site.

The OIG conducted site visits to thirty-three of the classes on four occasions each, one of the classes was visited on five occasions, and two of the classes were visited on two occasions each. As such, the OIG conducted site visits of 141 class sessions. During these visits, OIG investigators noted whether the classrooms were conducive to learning and provided a safe environment; observed the materials used; counted the students present; and observed the adult educators’ attendance. The review subsequently included an analysis of the reported attendance in comparison to the observed attendance.

Based on the review of the off-campus Adult Education sites, the OIG’s findings were as follows:

- There were significant disparities between the number of students enrolled in given classes at various off-campus Adult Education sites and the number of students observed by the OIG in those classes and/or the number of students reported as present in those classes by the adult educator.

- There were significant disparities between the number of students reported as present by the adult educator in given classes at various off-campus Adult Education sites and the number of students observed by the OIG in those classes.

- There is a lack of communication between the off-campus sites, the adult educators, and the College administration as well as a lack of consistent and meaningful oversight by the College. Communication and oversight are hampered by the great number of off-campus sites utilized by the College (twenty-nine in the spring and fall / sixteen in the summer) in relation to the number of off-campus sites utilized by the other City Colleges (five to seven).

- There were instances where off-campus Adult Education sites utilized the facilities of third parties, apparently without the knowledge of the College, to host Adult Education classes.

- An adult educator assigned to an off-campus site falsified her attendance records in that she represented that she was teaching a four hour class when in fact she was routinely providing less than two and one half hours of instruction. (See the summary for OIG Case Number 12-0003 documented later in this report)

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4 This does not include the visit to the site at which classes were subsequently cancelled.
An adult educator assigned to two separate sites reduced the number of hours that his class met at one site thus shortening the contact minutes for the course, and increased the number of hours that his class met at the other site, but did not obtain authority to do so. (See the summary for Case Number 11-0138 (adult educator) documented later in this report)

An adult educator assigned to an off-campus site routinely submitted student attendance sheets reflecting that all of the students were present when in fact they were not. (See the summary for OIG Case Number 11-0150 documented later in this report)

The City College failed to execute current Site Provider Agreements with the various sites.

The City College failed to maintain copies of any of the off-campus site providers’ certificates of liability insurance and maintained a 501(c)(3) letter for only one of the off-campus sites, both of which are required by the Site Provider Agreement.

CCC lacks District-wide policies and procedures regarding Adult Education classes.

Based on the above findings, the OIG the following recommendations, in part, to provide uniformity and allow for the use of best practices:

- Develop and implement District-wide policies and procedures regarding off-campus Adult Education sites and Adult Education classes in general.

- Develop and implement District-wide policies and procedures regarding the selection and cancellation of off-campus Adult Education sites.

- Develop and implement District-wide policies and procedures regarding class attendance.

- Develop and implement District-wide policies and procedures regarding the registration and pre- and post-testing of Adult Education students, including a requirement that registration and testing be solely conducted by the College and a requirement setting forth the minimum number of classes / hours to be completed prior to sitting for a post-test.

- Develop and implement District-wide policies and procedures regarding site visits by Adult Education administrators. Such policies may include the minimum number of regular unannounced site visits expected to be conducted as well as the aspects of the off-campus site to be reviewed, such as, whether the off-campus site is abiding by the Site Provider Agreement; whether the facilities are conducive to learning and providing
a safe environment for the students; whether the adult educator is providing appropriate and effective instruction; whether student attendance is accurately reported, and whether CCC Adult Education policies and procedures are being followed.

- Due to issues related to low attendance in comparison to enrollment, the close proximity of various off-campus sites, and the great number of off-campus sites utilized by the College (twenty-nine in the spring and fall / sixteen in the summer) in comparison to the number of off-campus sites utilized by the other Colleges (five to seven), the OIG recommended that the number of off-campus Adult Education sites utilized by the College be reduced to a more workable number.

In addition to the above broad recommendations, the OIG also made numerous specific recommendations regarding what the recommended policies and procedures should include.

Based on this review of off-campus Adult Education sites utilized by a City College during the Summer 2011 semester, investigations regarding three individuals were initiated which resulted in sustained findings of misconduct. Summaries of these three investigations immediately follow.

OIG Case Number 12-0003

An investigation of an adult educator assigned to an off-campus site was initiated. The OIG investigation revealed that on various occasions, the adult educator fraudulently misrepresented that she taught class from 5:00 p.m. to 9:00 p.m. at an off-campus site and, as a result, fraudulently received four hours of pay, when in fact she routinely began the class about one hour late and ended the class about one-half hour early. The adult educator’s actions violated Section IV, Paragraphs 7, 11, 17, 37, 38, and 50 of the CCC District-Wide Employee Manual.

The OIG recommended that the adult educator be terminated. The OIG further recommended that the adult educator be designated ineligible to be re-hired and that the adult educator’s personnel records reflect this designation.

As of the date of this Bi-Annual Report, the disciplinary process regarding the adult educator is pending.

OIG Case Number 11-0150

An investigation regarding an adult educator assigned to another off-campus site was initiated. The OIG investigation revealed that the adult educator falsified attendance or other employment records, in that on at least two occasions, and on as many as eight occasions, she submitted a student attendance sheet
reflecting that all of her enrolled students were present for class when in fact they were not, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.

Prior to the submission of the results of the OIG investigation, the adult educator resigned from her position with CCC. Due to the adult educator’s resignation, the OIG recommended that the adult educator be designated as ineligible to be re-hired and that the adult educator’s personnel records reflect such designation.

The adult educator was subsequently designated not eligible to be re-hired.

**OIG Case Number 11-0138 (adult educator)**

An investigation of an adult educator assigned to two off-campus sites was initiated. The OIG investigation revealed that the adult educator, without authorization, changed his English as a Second Language ("ESL") Adult Education class at an off-campus site from four hours to three hours and his ESL class at another off-campus site from two hours to three hours. Nonetheless, the adult educator certified on his Certificates of Attendance that he taught a four hour class at one of the off-campus sites and a two hour class at the other off-campus site, in violation of Section IV, Paragraphs 7 and 11 of the CCC District-Wide Employee Manual. The OIG investigation also revealed that the adult educator was inattentive to his duty, in that he failed to ensure that the various student attendance sheets that he submitted for his Adult Education class at one of the off-campus sites reflected the students actually present in the given classes, in violation of Section IV, Paragraph 38 of the CCC District-Wide Employee Manual.

The OIG recommended that CCC take appropriate disciplinary action against the adult educator.

As of the date of this Bi-Annual Report, the disciplinary process regarding the adult educator is pending.

**OIG Case Number 11-0146**

In early June 2011, per the directive of the Mayor of the City of Chicago, CCC and sister City agencies ceased using agency issued P-Cards. The OIG and the CCC Department of Internal Audit ("Internal Audit") reviewed CCC P-Card transactions for the period of July 1, 2010 to June 2011. There were a total of ten P-Cards issued to District Office employees. One of these P-Cards was issued to the Inspector General. One of these P-Cards was issued to the District Director of Treasury Services and was primarily used to make on-line payments to various CCC vendors. This P-Card is known as the AP (Accounts Payable) P-Card. Eight of the P-Cards were issued to senior level District Office employees. The OIG reviewed the P-Card transactions by the District Office employees.
Internal Audit reviewed the P-Card transactions at the various colleges as well as the transactions conducted via the P-Card issued to the Inspector General.\(^5\)

The eight District Office employees who were issued CCC P-Cards were the Executive Assistant to the Chancellor; the Vice-Chancellor of Strategy and Institutional Intelligence; the Executive Director of Legislative and Governmental Affairs; the Associate Director of Legislative and Governmental Affairs; the Treasurer; the Vice-Chancellor of Information Technology; the Director of Field Auditing Services with the Department of Administrative Services; and the Director of Security for the District Office. The OIG reviewed 438 transactions totaling more than $37,300.00 conducted via these eight P-Cards. The OIG review revealed that travel-related transactions accounted for 48% of the expenditures. The OIG review revealed no expenditures which appeared to be for personal gain or made with fraudulent intent.

Although the OIG identified twelve of the 438 transactions (less than 3%) as problematic, none of these expenditures demonstrated any indicia of fraudulent purpose. The funds expended on these twelve transactions only amounted to $444.51 or about 1% of the funds expended via P-Cards issued to the eight District Office senior level employees for the period of July 1, 2010 through June 6, 2011 that were the subject of this portion of the OIG review. These problematic expenditures included the following:

- Ten expenditures totaling $81.25 for travel-related food purchases where the food purchase (typically coffee) was made in Chicago.
- An expenditure in the amount of $199.99 to Flowers.com for an “all-white sympathy standing spray” for the leader of a local church who passed away.
- An expenditure in the amount of $154.00 to a Chicago Public Schools charter school for two tickets for “Harry Potter and the Deathly Hallows Private Advance Screening & Reception – Reception and VIP Seating for the Film,” pursuant to a school fundraiser for scholarships.
- An expenditure in the amount of $9.27 to Office Depot for one box of Tylenol. The CCC Purchasing Card Cardholder Guide, in effect at the time, provided that the P-Card is not to be used for personal purchases, including pharmaceuticals.

The OIG review also found that between January 3, 2011 and April 18, 2011, a CCC P-Card was utilized to pay for rental cars for travel to Springfield on CCC legislative business. These expenditures, representing four transactions, totaled $2,124.13. During the course of this review, the OIG further found that between

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\(^5\) It should be noted that as a result of its audit of P-Card expenditures at the various Colleges, CCC Internal Audit referred various issues to the OIG for follow-up investigative work. The OIG Investigative Summary to be submitted regarding the follow-up investigative work will be summarized in the Bi-Annual Report for the period of January 1, 2012 to June 30, 2012.
41% and 69% of the days that CCC rented the vehicle, the vehicle was essentially sat parked.

The OIG also reviewed the expenditures made utilizing the P-Card issued to the District Director of Treasury Services. This P-Card, commonly referred to as the "AP (Accounts Payable) P-Card", is primarily utilized to make on-line payments to CCC vendors. Regarding this P-Card, the OIG reviewed eleven AP P-Card statements and supporting documentation for the time frame of July 1, 2010 through May 24, 2011. During this period, the AP P-Card was used in 637 transactions totaling more than $2 million. The AP P-Card payments included expenditures for CCC telephone service (69.07% of the transactions / 65.22% of the expenditures), photocopier leases (5.81% / 18.91%), and office supplies (9.73% / 4.2%).

As with the OIG review of the P-Cards issued to the eight District Office employees, the OIG review of expenditures via the AP P-Card did not reveal any use of the P-Card for personal gain or expenditures made with fraudulent intent. The OIG review did reveal some failures to abide by CCC policies, like processing payments not supported by invoices. The OIG review also revealed instances where Accounts Payable personnel failed to accurately and/or timely record AP P-Card transactions in the PeopleSoft Finance application, which is the main system used by CCC to manage vendor budgets, to generate vendor payment histories, and to generate trial balance and profit and loss statements. The OIG reported that these failures to abide by CCC policies are magnified when committed by the Department of Finance / Accounts Payable staff. Accounts Payable, as reviewer of others’ P-Card expenditures, must act with utmost diligence to ensure that its employees are strictly following such procurement policies since Accounts Payable is the end of the P-Card review process. Any failure to abide by CCC procurement policies by Accounts Payable puts CCC at great risk since Accounts Payable’s work is not subject to the same independent monthly review as are other P-Card holders, while Accounts Payable’s P-Card expenditures amounted to 99% of CCC P-Card expenditures.

Based on the OIG review of the expenditures via the P-Cards issued to the eight District Office employees and the AP P-Card, the OIG submitted various recommendations to better manage risks associated with the use of P-Cards and better ensure that CCC financial records are accurately maintained. It should be noted that CCC also took action to manage related risks via the CCC Employee Reimbursement Policy, dated July 31, 2011.

**OIG Case Number 12-0024**

The OIG received a complaint that during the 2011 Summer semester, a college receptionist II assigned to a City College was attending classes at the College during her regular work hours and did not make up the work hours that she missed while in class. The OIG investigation revealed that the employee
attended classes during her regularly scheduled work hours since at least 2008. The OIG investigation revealed that the employee represented that she was working when in fact she was attending classes while on CCC work time and failed to make up the work hours she spent in class, in violation of Section IV, Paragraphs 7, 11, 17, 38, and 50 of the CCC District-Wide Employee Manual. The OIG investigation also revealed that on numerous Certificates of Attendance, the employee erroneously calculated her total hours which resulted in the employee receiving pay for hours not supported by the times that she documented on the Certificates of Attendance, in violation of Section IV, Paragraph 17 of the CCC District-Wide Employee Manual.

Additionally, the OIG investigation revealed that the employee had two supervisors since the employee’s duties and pay were split between two grant programs. The OIG investigation revealed that the supervisors were inattentive to their duty as the employee’s supervisors, in that they failed to ensure that the employee made up the work hours that she missed by attending classes while on CCC work time. The OIG investigation further revealed that one of the supervisors was also inattentive to her duty as the employee’s supervisor, in that the supervisor approved numerous Certificates of Attendance on which the employee erroneously calculated her total hours which resulted in the employee receiving pay for hours not supported by the times that the employee documented on the Certificates of Attendance.

The OIG recommended that the college receptionist II be terminated. The OIG also recommended that the college receptionist II be designated ineligible to be re-hired and that her personnel records reflect this designation. The OIG further recommended that CCC take appropriate disciplinary action against the two supervisors.

As of the date of this Bi-Annual Report, the disciplinary process regarding each of the employees is pending.

OIG Case Number 12-0037

The OIG received a complaint that a janitor assigned to a City College damaged an air conditioning unit when he fired a pellet at raccoons which were purportedly near the air conditioning unit above the door of a City College building. An estimate subsequently obtained by the chief engineer assigned to the City College revealed that it would cost $2,100.00 to repair the damaged condenser coil and would cost $7,980.00 to replace the damaged condenser coil.

The OIG investigation, greatly aided by security video of the incident, revealed that the janitor used a CO2 pistol to fire a pellet at raccoons which caused the damage to the air conditioning unit. The janitor’s actions violated Section IV, Paragraphs 16, 28, 34 and 50 of the CCC District-Wide Employee Manual.
Additionally, during an interview with the OIG, the janitor made at least three false statements to the OIG. Making false statements during an official investigation violates Section IV, Paragraph 8 of the CCC District-Wide Policy Manual.

Lastly, the OIG investigation revealed that the janitor and another janitor assigned to the City College spent between one hour and two and one half hours watching television at the campus when they should have been performing their janitorial functions. Thus, the employees were inattentive to their duties, in violation of Section IV, Paragraph 38 of the CCC District-Wide Policy Manual.

Based on the investigation, the OIG recommended that the janitor who fired the pellet be terminated and be designated as ineligible to be re-hired. The OIG recommended that CCC take appropriate disciplinary action against the other janitor.

Following the disciplinary process, the Board of Trustees approved the termination of the janitor who fired the pellet which caused the damage to the air conditioning unit. The janitor was also designated not eligible to be re-hired.

As of the date of this Bi-Annual Report, the disciplinary process regarding the other janitor is pending.

OIG Case Number 12-0005

The OIG received a complaint that equipment at an enterprise unit of the City Colleges was being used for personal use. The OIG investigation revealed that the unit lacked sufficient policies and procedures regarding the use and safeguarding of its equipment. The OIG investigation further revealed that an administrator was inattentive to his duty, in that he failed to take any action to establish policies or procedures regarding the use and safeguarding of the unit’s equipment, which only increased the risk that the equipment would not be accounted for, in violation of Section IV, Paragraph 38 of the CCC District-Wide Employee Manual. The OIG investigation further revealed that an employee assigned to the unit used CCC property for unauthorized purposes, in that on as many as nine occasions, he used the unit’s equipment for personal use, in violation of Section IV, Paragraph 19 of the CCC District-Wide Employee Manual and Section 5 of the CCC Ethics Policy.

Based on the investigation, the OIG recommended that policies and procedures be developed and implemented regarding the use and safeguarding of all of the unit’s equipment. The OIG also provided specific recommendations regarding what should be included in such policies and procedures. The OIG further recommended that CCC take appropriate disciplinary action against the administrator. Being that the employee resigned prior to the submission of the
OIG Investigative Summary, the OIG did not recommend any action against the employee.

Following the disciplinary process, the administrator was issued a written reprimand.

Additionally, the enterprise unit developed and implemented policies and procedures consistent with the OIG’s recommendations.

OIG Case Number 12-0008

The OIG received a complaint that a program director assigned to a City College disclosed confidential education records of a CCC student to the student’s mother, without the student’s consent. The OIG investigation revealed that the program director did in fact disclose confidential education records of a CCC student to the student’s mother, without the student’s consent, contrary to the Family Educational Rights and Privacy Act (“FERPA”) and in violation of Section IV, Paragraphs 15 and 43 of the CCC District-Wide Employee Manual.

Due to the fact that the program director resigned from employment with CCC, the OIG did not recommend any disciplinary action.

The OIG investigation further revealed that CCC lacks effective District-wide policies and procedures to provide employees and students with sufficient information regarding their duties and rights under FERPA. Based on the investigation and in order to reduce the risk of CCC violating FERPA, the OIG recommended that CCC develop and implement District-wide policies and procedures to provide employees and students with sufficient information regarding their duties and rights under FERPA. The OIG also recommended the following: a) in a conspicuous location on its main website, a clear and thorough explanation of FERPA should be included; and b) FERPA training for all employees at the time of hire and on an annual basis.

OIG Case Number 11-0111

The OIG initiated an investigation based on a complaint which originated with several students enrolled in a class taught by a full-time faculty member at a City College. The students complained that they noticed on the Blackboard website that the faculty member repeatedly changed their posted exam scores. The students stated that they informed the faculty member that they did not know what their exam scores were and the faculty member responded by telling them, “Let me work the numbers. Read between the lines. Don’t worry, you will all pass.”

During the course of the investigation, the OIG interviewed two of the students, conducted two interviews of the faculty member, and reviewed and recalculated
all of the five exams and the grades issued by the faculty member. The OIG investigation revealed various problematic issues regarding the manner in which the faculty member calculated the exam scores and the final grades for the sixteen students enrolled in her Spring 2011 class. In summary, the OIG investigation revealed the following:

- With regards to one exam, the faculty member did not use consistent mathematical formulas in arriving at the final scores for her sixteen students. In fact, the faculty member used at least four different formulas in scoring the students’ exams.

- The OIG was unable to reproduce the faculty member’s final scores on four exams for a total of nine students.

- The formula used by the faculty member to calculate eight of the sixteen (50%) students’ Exam I scores was not mathematically sound and resulted in skewing the scores high. The OIG analysis revealed that when Exam I scores were calculated using a more sound mathematical formula, the Exam I scores of thirteen of the sixteen (81%) students were lower than the Exam I scores issued by the faculty member. The OIG analysis revealed that the calculation using the more sound mathematical formula resulted in a lower actual final letter grade for one student.

- The faculty member also used an unsound mathematical formula to calculate her students’ scores on the Final Exam.

- The faculty member did not consistently round the students’ scores or consistently credit fractional scores when posting students’ scores.

- The faculty member credited one student with a total of 1.5 points for two quizzes when she only credited one point to all of the other students in the class.

- When the OIG calculated a student’s final grade using a more sound mathematical formula to score one of the exams, the OIG analysis revealed that the student should have received the final grade of “D” as opposed to the final grade of “C” issued by the faculty member.

- When the OIG calculated another student’s final grade based on the unsound mathematical formula that the faculty member used to calculate at least eight of the other students’ scores for the exam, the OIG analysis revealed that the student should have received the final grade of “C” as opposed to the final grade of “D” issued by the faculty member. Also, when the OIG calculated the student’s final grade using the formula that the faculty member actually used to calculate another student’s score for Exam I, the OIG analysis revealed that the student should have received
the final grade of “C” as opposed to the grade of “D” issued by the faculty member. However, when the OIG calculated the student’s final grade using the more sound mathematical formula to score the exam, the OIG analysis revealed that the student’s final grade resulted in the grade of “D”.

- During the term, the faculty member added an exam, Exam II, to the curriculum of her Spring 2011 semester class that was not included in the syllabus.

- The faculty member changed students’ posted scores on thirty-two occasions. The changes typically raised the students’ exam scores. However, regarding the faculty member’s final posted scores, the faculty member provided reasonable and verifiable explanations for some of the changes but not for others. In five instances, the exam score derived through the OIG’s calculation matched or more closely matched the score initially posted by the faculty member as opposed to the faculty member’s final posted score.

The OIG investigation found that based on the above, at the very least, the faculty member was inattentive to her duty and incompetent in the performance of her duty as a full-time faculty member, contrary to Section IV, Paragraphs 38 and 39 of the CCC District-Wide Employee Manual.

The OIG recommended that CCC take appropriate disciplinary action against the faculty member. The OIG also recommended that the Department of Academic Affairs determine whether it would be appropriate to adjust the final grades of two students, based on the OIG analysis of their scores / grades.

Following the disciplinary process, the faculty member was suspended for a two week period.

**OIG Case Number 11-0001**

The OIG received a complaint that a college accountant assistant assigned to a City College resided outside the City of Chicago in violation of the CCC residency requirement. The OIG investigation revealed that the employee resided outside the City of Chicago in Calumet Park, Illinois, in violation of Section 3.7(a) of the Board Rules of Management and Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation revealed that the employee falsified employment records, in that on a CCC 2011 Annual Certification of Residency form, the employee fraudulently affirmed that she resided in the City of Chicago, when in fact she resided in Calumet Park, Illinois, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.
The OIG investigation further revealed that the college accountant assistant falsified her attendance records. Surveillances conducted by the OIG revealed that on at least five occasions, the employee certified false start times on Certificates of Attendance, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.

The OIG recommended that the college accountant assistant be terminated. The OIG further recommended that the college accountant assistant be designated ineligible to be re-hired and that her personnel records reflect this designation.

The college accountant assistant resigned from her position with CCC. The college accountant assistant was subsequently designated not eligible to be re-hired.

OIG Case Number 11-0055

The OIG received a complaint that a college financial aid advisor assigned to a City College resided outside the City of Chicago in violation of the CCC residency requirement. The OIG investigation revealed that the employee resided outside the City of Chicago in Calumet City, Illinois, in violation of Section 3.7(a) of the Board Rules of Management and Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation also revealed that the employee falsified employment records, in that on two CCC residency certification documents, the employee fraudulently affirmed that she resided in Chicago, Illinois, when in fact she resided in Cicero, Illinois, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.

The OIG investigation further revealed that the employee falsified her attendance records. Surveillances conducted by the OIG revealed that on at least five occasions, the employee certified start times on her Certificate of Attendance which were significantly earlier than her actual start times, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.

The OIG recommended that the college financial aid advisor be terminated. The OIG further recommended that the college financial aid advisor be designated ineligible to be re-hired and that her personnel records reflect this designation.

As of the date of this Bi-Annual Report, the disciplinary process regarding the college financial aid advisor is pending.

OIG Case Number 11-0130 (senior level administrator)

As a result of the 2011 OIG audit of compliance with the District’s residency requirement, which was documented in the Bi-Annual Report for the period of January 1, 2011 to June 30, 2011, the OIG initiated an investigation of a senior level employee assigned to the District Office. The OIG investigation revealed
that the employee resided in Glenwood, Illinois, in violation of the Section 3.7(a) of the Board Rules of Management and Government and Section III of the CCC District-Wide Employee Manual. Also, during an interview with the OIG, the employee refused to answer a question posed by the OIG dealing with the source of funds that were used as a security deposit for a purported sub-leased unit in the City of Chicago. Such refusal to cooperate with the OIG violated Section 2.6.4(b) of the Board Rules of Management and Government.

The senior level administrator retired from his position one day after an interview with the OIG and one day prior to the submission of the OIG Investigative Summary documenting the investigation. In that the OIG would have recommended that the senior level administrator be terminated, the OIG recommended that Department of Human Resources designate the administrator ineligible to be re-hired.

The senior level administrator was subsequently designated not eligible to be re-hired.

**OIG Case Number 11-0130 (program director)**

During the course of the investigation of the senior level administrator discussed above, the OIG interviewed the director of a program at a City College, who owned the unit in the City allegedly leased by the administrator to attempt to establish his residency. Based on the OIG investigation and a second interview of the director, the OIG found that the director made several false statements to the OIG. Making false statements during an official investigation violated Section IV, Paragraph 8 of the CCC District-Wide Policy Manual. Moreover, the OIG investigation revealed that the director fraudulently created a lease, a receipt reflecting that a security deposit was paid, and three receipts reflecting that rent was paid for the City unit, when in fact the administrator did not pay a security deposit or any rent to the director. The director’s action, in creating the documents and in signing another’s signature on the receipt reflecting that a security deposit was paid, constituted forgery. As such, the director violated Section IV, Paragraph 15 of the CCC District-Wide Employee Manual.

The OIG recommended that the director be terminated and be designated as ineligible to be re-hired.

Following the disciplinary process, the Board of Trustees approved the termination of the director. Additionally, the director was designated not eligible for re-hire.
OIG Case Number 11-0047

The OIG received a complaint that a janitor assigned to a City College resided outside the City of Chicago in violation of the CCC residency requirement. The OIG investigation revealed that the employee resided outside the City of Chicago in Calumet City, Illinois, in violation of Section 3.7(a) of the Board Rules of Management and Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation also revealed that the employee falsified employment records, in that on a City Colleges of Chicago residency certification document, the employee fraudulently affirmed that she resided in Chicago, Illinois when in fact she resided in Calumet City, Illinois, in violation of Section IV, Paragraph 11 of the CCC District-Wide Employee Manual.

The OIG recommended that the janitor be terminated. The OIG further recommended that the janitor be designated ineligible to be re-hired and that her personnel records reflect this designation.

As of the date of this Bi-Annual Report, the disciplinary process regarding the janitor is pending.

OIG Case Number 11-0117

During the course of the 2011 OIG audit of the District’s compliance with the residency policy, the OIG reviewed the on-line residency certification form submitted by an assistant chief engineer at a City College. Based on this review, an investigation was initiated. The OIG investigation revealed that the assistant chief engineer was hired by CCC in April 1994 and he currently resided in Evergreen Park, Illinois; thus pursuant to Board Rules and the CCC District-Wide Policy Manual, as a full-time employee, the assistant chief engineer was required to be a resident of the City of Chicago as a condition of employment.

Based on a December 2002 side letter agreement between the Board and the International Union of Operating Engineers, Local 399, it was the assistant chief engineer’s position that he was exempt from the CCC residency requirement. The side letter covered engineers who had been CCC employees, who were terminated due to a reduction in force when CCC privatized the engineering and custodial services at various CCC facilities (November 2001), who were hired by the CCC vendor, and who were subsequently re-hired by CCC when CCC re-assumed direct responsibility for engineering and custodial services at the facilities previously privatized (January 2003). The side letter provided that a re-hired engineer, who was not in compliance with the CCC residency policy, was exempt from the residency policy if the engineer came out of compliance between November 1, 2001 and December 1, 2002, but if said employees moved their residence at any time during their employment by the Board, they must come into compliance with the Board’s residency rules.
The OIG investigation further revealed that the engineer did not come out of compliance with the CCC residency policy between November 1, 2001 and December 1, 2002, despite the fact that the engineer claimed that he resided in the City of Chicago from just after his original date of hire by CCC until after November 1, 2001. The OIG investigation revealed that the engineer did not reside at the Chicago residence of his sister-in-law and her husband for the seven year period that he claimed but instead resided in the Evergreen Park home where his wife and children resided. The OIG investigation revealed that, based on interviews with the sister-in-law and her husband who now reside out of state, the assistant chief engineer only resided with his in-laws for a few months as opposed to seven years. The OIG investigation further revealed that during this period the assistant chief engineer voted nine times. On each of these nine occasions, he voted in Evergreen Park, Illinois. Also, despite the fact that the assistant chief engineer claimed that he was residing with his sister-in-law due to marital difficulties with his wife, during this period, three of the assistant chief engineer's four children, with his wife, were born.

The OIG recommended that the assistant chief engineer be terminated.

Following the disciplinary process, the assistant chief engineer was initially terminated. Subsequently, following a grievance filed by the assistant chief engineer, the termination was rescinded and the assistant chief engineer was issued a suspension of seventy days as disciplinary action for his false statements made during his interview with the OIG.

**OIG Case Number 11-0133**

The OIG received a complaint that a chief engineer assigned to a City College resided in Oak Lawn, Illinois in violation of the CCC residency requirement. The OIG investigation revealed that the chief engineer was hired by CCC in 1981 and he currently resided in Oak Lawn, Illinois, thus pursuant to Board Rules and the CCC District-Wide Policy Manual, as a full-time employee, the chief engineer was required to be a resident of the City of Chicago as a condition of employment.

Despite the fact that Board Rule 3.7(a) provides four exceptions to the residency requirement, including full-time employees in janitorial, operating engineer and firemen classifications (Job families 811, 812, and 831) hired prior to January 1, 1980, the chief engineer claimed that when he was hired, he was informed that anyone hired prior to January 1, 1982 did not have to be a resident of the City of Chicago as a condition of employment with CCC. The OIG located a memorandum, dated August 13, 1998, from the then Vice Chancellor of Human Resources to the College Presidents, that “employees in these three categories (janitors, engineers, and firemen) must establish city residency only if they have a new hire date after 1/1/82, the date that privatized staff were absorbed into our workforce.” The OIG requested that the Department of Human Resources
determine from its records whether the January 1, 1982 date was based on Board action or was simply an error or a “typo”. The Department of Human Resources could not locate any Board action supporting the January 1, 1982 date.

Since Board Rule 3.7(a) provides that only engineers hired before January 1, 1980 were not subject to the residency requirement and based on the lack of any evidence demonstrating that the January 1, 1982 date was anything but a mistake, the OIG recommended that the chief engineer be terminated.

After reviewing the OIG file, the CCC General Counsel expressed that he did not believe that CCC could successfully defend the OIG’s recommendation to terminate the chief engineer before an arbitrator or on review before the Circuit Court of Cook County. No disciplinary action was taken against the chief engineer.

**Report Documenting Not Sustained Finding**

**OIG Case Number 12-0009**

It is not the usual policy of the OIG to submit reports documenting investigations which result in not sustained findings. However, due to the fact that the allegation was widely communicated by the complainant and pursuant to a request by the Office of the General Counsel for written documentation regarding the outcome of the OIG investigation, the OIG submitted a report of the findings of this investigation.

The OIG received a complaint that a clinical coordinator at a City College engaged in inappropriate grade tampering following an exam given during the Fall 2010 semester. The OIG investigation did not reveal sufficient evidence to support a sustained finding of misconduct on the part of the accused employee or any other CCC employee. As such, the OIG did not recommend that any disciplinary or other action be taken.
REPORT
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InspectorGeneral@ccc.edu

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Suite 1740
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