

# Office of the Inspector General City Colleges of Chicago

---

---

## Office of the Inspector General Bi-Annual Report January 1, 2012 – June 30, 2012

Prepared pursuant to Article II, Section 2.7.5 of the Board Bylaws

---

---

John A. Gasiorowski  
Inspector General

Office of the Inspector General  
City Colleges of Chicago  
11 South LaSalle Street  
Suite 1740  
Chicago, Illinois 60603  
Phone: (312) 553-3400  
Fax: (312) 553-3418  
Hotline: (312) 553-3399

E-Mail: [InspectorGeneral@ccc.edu](mailto:InspectorGeneral@ccc.edu)

Web: <http://ccc.edu/departments/Pages/Inspector-General.aspx>



To: Cheryl L. Hyman, Chancellor  
Paula Wolff, Chair of the Board of Trustees  
Ellen Alberding, Vice Chair 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  
Susan Santiago, Trustee  
Zakeia Hampton, Student Trustee

From: John A. Gasiorowski, Inspector General

Date: August 7, 2012

RE: OIG *Bi-Annual Report* for the period of January 1, 2012 through June 30, 2012

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 Board Bylaws. Pursuant to Section 2.7.5, the *Bi-Annual Report* for the period of January 1<sup>st</sup> through June 30<sup>th</sup> is required no later than September 1<sup>st</sup> each year. This is the fourth *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 made part of the Board Bylaws, effective December 1, 2011, as Article II, Section 2.7 et seq.

Section 2.7 et seq. of the Board Bylaws 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* covers the period of January 1, 2012 through June 30, 2012.

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.

## Office of the Inspector General Bi-Annual Report

### Mission of the Office of the Inspector General

The Office of the Inspector General (“OIG”) of the City Colleges of Chicago (“CCC”) will help 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.

### Updates to Investigations Documented in the Previous Bi-Annual Report

In the *Bi-Annual Report* submitted for the July 1, 2011 to December 31, 2011 reporting period, the OIG reported on fifteen investigations which resulted in sustained findings of waste, fraud and misconduct. At the time the *Bi-Annual Report* was submitted, disciplinary action was 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 CCC.

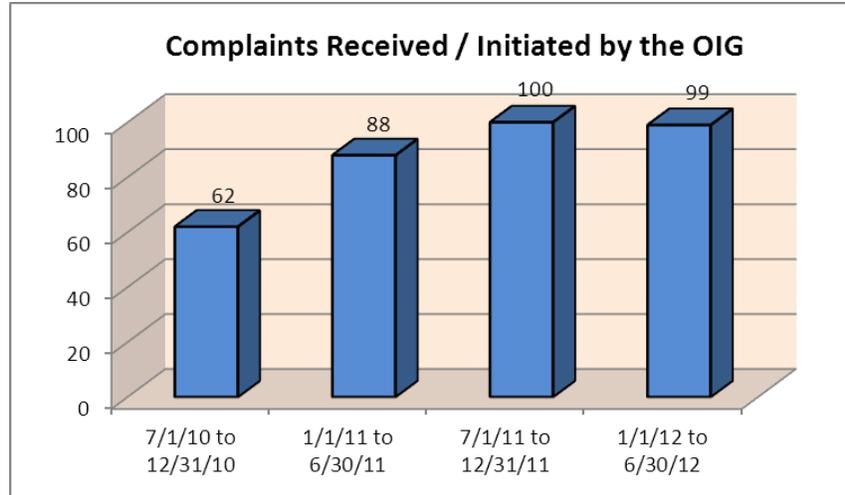
Case Number	Subject	Recommended Disciplinary Action	Disciplinary Action Taken
11-0111	Full-Time Faculty	Appropriate Discipline	10 day suspension
11-0130	Senior Level Administrator	Termination / Do Not Rehire	Resignation / Do Not Rehire
11-0130	Program Director	Termination / Do Not Rehire	Termination / Do Not Rehire
11-0117	Engineer	Termination	70 day suspension
11-0133	Chief Engineer	Termination	None
12-0137	Janitor	Termination / Do Not Rehire	Termination / Do Not Rehire
12-0137	Janitor	Appropriate Discipline	3 day suspension
12-0005	Administrator	Appropriate Discipline	Written Reprimand
11-0055	College Financial Aid Advisor	Termination / Do Not Rehire	Termination / Do Not Rehire
11-0001	College Accountant Assistant	Termination / Do Not Rehire	Termination / Do Not Rehire
11-0138	Adult Educator	Appropriate Discipline	Written Reprimand
12-0003	Adult Educator	Termination / Do Not Rehire	Termination / Do Not Rehire
11-0150	Adult Educator	Do Not Rehire <sup>1</sup>	Do Not Rehire
11-0047	Janitor	Termination / Do Not Rehire	Termination / Do Not Rehire
12-0024	College Receptionist II	Termination / Do Not Rehire	Termination / Do Not Rehire
12-0024	Project Director	Appropriate Discipline	Termination
12-0024	Project Director	Appropriate Discipline	Written Reprimand

### Complaints Received

For the period of January 1, 2012 through June 30, 2012, the OIG received ninety-nine complaints. These ninety-nine 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.<sup>2</sup> For purposes of comparison to the number of complaints received during the period of January 1, 2012 through June 30, 2012, the following table documents the complaints received by the OIG during previous reporting periods.

<sup>1</sup>The employee resigned prior to the conclusion of the investigation, thus the OIG only recommended that the employee’s personnel records reflect the designation “Do Not Rehire”.

<sup>2</sup> Under Article II, Section 2.7.2 of the Board Bylaws, 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;....



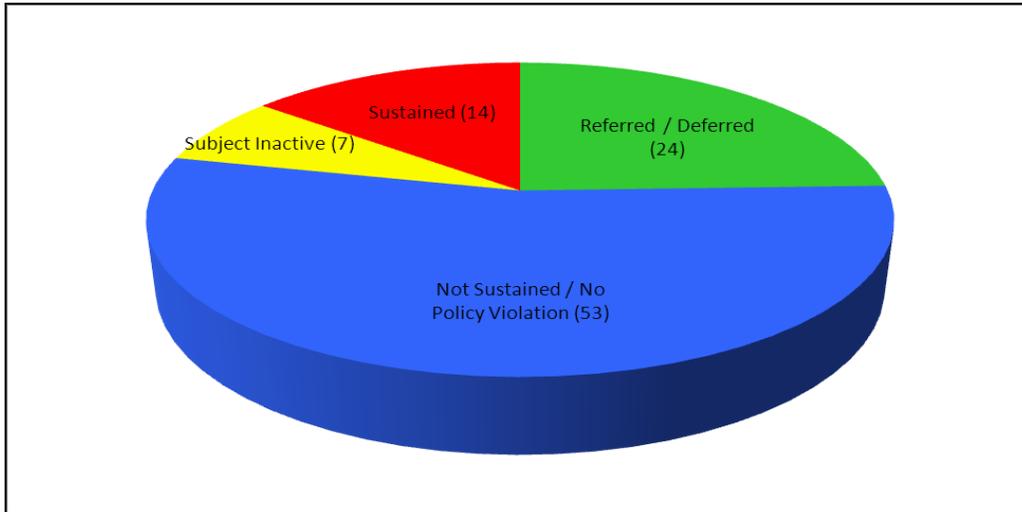
The ninety-nine complaints received represent a variety of subject matters. The table below documents the subject matters of the complaints received.

Subject Matter	Number
Financial Aid Fraud	2
Sexual or Other Harassment	2
Grade Tampering	3
Ethics Violation	3
Conduct Unbecoming a Public Employee	4
Fraud	4
Misappropriation of Funds / Theft	5
Discourteous Treatment	6
Preferential Treatment	7
Other CCC District-Wide Employee Manual Violations	8
Discrimination	9
Inattention to Duty	9
Falsification of Attendance Records	10
Residency	13
Reviews Initiated by the OIG	14
<b>Total</b>	<b>99</b>

### Status of Complaints

As reported in the previous Bi-Annual report, as of January 1, 2012, the OIG had ninety complaints that were pending, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of January 1, 2012 through June 30, 2012, the OIG closed ninety-eight complaints. These complaints were closed for a variety of reasons, including the following: the complaint was sustained following an investigation 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 ninety-eight complaints during this reporting period.



As of June 30, 2012, the OIG had ninety-one pending complaints.

### **OIG Reports Submitted – January 1, 2012 through June 30, 2012**

During the reporting period of January 1, 2012 through June 30, 2012, the OIG submitted seventeen reports.<sup>3</sup> These seventeen reports included the annual certification of residency audit, three reports documenting OIG reviews, and thirteen reports documenting sustained findings of waste, fraud and/or misconduct.

### **Annual Certification of Residency Audit**

Under the heading *Annual Certification of Residency*, Section 4.6(a) of the Board Policies and Procedures for Management & Government, which sets forth the CCC Residency Policy, provides that on February 1<sup>st</sup> of each year every full-time employee of CCC will be required to certify their compliance with this residency policy. The employee’s certification shall include an oath or affirmation that the employee is not required to be an actual resident because he/she falls within one of the exceptions to the requirement or that the employee is an actual resident of the City of Chicago. Additionally, Section 4.6(a) provides that “the Inspector General shall conduct an annual audit of the District’s compliance with this Rule

<sup>3</sup> Pursuant to Section 2.7.3 of the Board Bylaws, 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.

and shall submit a report of audit findings to the Board no later than the first regularly scheduled public meeting of the Board following July 1<sup>st</sup> of each year.”

On January 31, 2012, all full-time employees of CCC were sent an e-mail regarding the requirements of Section 4.6(a) of the Board Policies and Procedures for Management & Government and the need to complete the on-line *Annual Certification of Residency*.

On June 8, 2012, the OIG submitted to the Board of Trustees and the Chancellor the results of the 2012 Audit of Compliance with the District’s Residency Requirement. The OIG audit revealed that by April 4, 2012, 99.39% of full-time active and working CCC employees responded to the 2012 Annual Certification of Residency process. The table below documents the responses received:

Response	Number	%
No response	12	0.61%
No response due to employee being on leave	27	1.37%
No response due to termination of employee or change to part-time status	24	1.22%
1. Required to be a resident, with correct address	1734	87.80%
2. Not required to be a resident, with correct address	33	1.67%
3. Required to be a resident, with incorrect address	108	5.47%
4. Not required to be a resident, with incorrect address.	1	0.05%
5. Required to be a resident, but does not currently live within the City of Chicago.	36	1.82%
<b>Totals</b>	<b>1975</b>	<b>100%</b>

The OIG audit further revealed the following:

- The OIG contacted the twelve working and active employees who simply did not respond. All subsequently completed Residency Statements. Eleven of the employees affirmed that they resided in the City of Chicago. One of the employees affirmed that he did not reside in the City of Chicago but he was not required to do so due to the fact that he started employment with CCC prior to July 1, 1977. With these twelve responses, 100% of the active and working full-time employees responded to the 2012 certification of residency process.
- Regarding the twenty-seven employees who failed to respond due to the fact that they were on a leave of absence during the process, the OIG found that four of these employees subsequently returned to work. Two of these four employees submitted responses upon their return to work. These two employees affirmed that they resided in the City of Chicago. The OIG contacted the other two employees for responses. These two employees also affirmed that they resided in the City of Chicago.
- Regarding the thirty-six employees who responded that they were required to be residents but did not currently reside within the City of Chicago, the OIG found the following:

- Twenty-four of these employees were employed for less than six months or previously received approved extensions.
- Twelve of these employees responded that they did not currently reside within the City of Chicago, despite the fact that CCC records indicated a City of Chicago residential address for the employee.
  - The OIG reviewed CCC personnel records and public records. This review revealed that nine of these twelve employees clearly reside within the City of Chicago and must have checked the wrong box on the Annual Certification of Residency form.
  - One of these twelve employees was previously investigated by the OIG based on an allegation that the employee was in violation of the CCC residency policy. This investigation, which subsequently resulted in the termination of the employee, is summarized later in this *Bi-Annual Report* under OIG Case Number 11-0123.
  - The OIG initiated investigations regarding two of these twelve employees. The OIG investigation regarding one of these employees revealed that the employee did in fact reside in the City of Chicago. As of the date of this report, the other investigation is pending.
- Regarding the thirty-four employees who responded that they were not required to be a resident of the City of Chicago, the OIG found the following:
  - Twenty-four of these employees were hired before July 1, 1977 and thus fall within an exception to the residency requirement.
  - One of these employees was an engineer hired before January 1, 1980 and thus falls within an exception to the residency requirement.
  - One of these employees was married to an employee who was exempt from the residency policy and thus falls within an exemption to the residency policy. The OIG reviewed CCC personnel records and confirmed that the employee was married to another CCC employee who was hired before July 1, 1977.
  - Eight of these employees were exempt from the residency requirement due to side letter agreements.

## Reports Documenting OIG Reviews

### Review of CCC M/WBE Compliance Monitoring

During the course of conducting several reviews of Minority / Women Business Enterprise (“M/WBE”) compliance by given CCC vendors, the OIG requested copies of *Monthly and Quarterly Reports of Payments to MBE and WBE Subcontractors* from the Department of Administrative and Procurement Services. These documents are required to be submitted by CCC vendors pursuant to the *CCC Minority and Women Business Enterprise Contract Participation Plan*. Likewise, the OIG requested copies of quarterly and annual reports submitted to the Board of Trustees concerning the status of CCC’s ability to be in compliance with the *CCC Minority and Women Business Enterprise Contract Participation Plan*. These reports are required to be submitted to the Board of Trustees pursuant to Section 2.9(C) of the Board Policies and Procedures for Management & Government. Based on the responses to the OIG’s request for such documents, the OIG conducted a review of CCC M/WBE compliance monitoring. Due to the seriousness of these deviations from Board policies and procedures and the risks inherent in failing to require vendors to attest to their compliance with CCC M/WBE requirements, the OIG reported on these issues despite the fact that the OIG reviews of CCC vendors’ compliance with M/WBE goals and other M/WBE and procurement related issues were on-going. The OIG review revealed the following:

- CCC vendors routinely failed to submit *Monthly and Quarterly Reports of Payments to MBE and WBE Subcontractors* and other required documents to the Office of M/WBE Contract Compliance of the Department of Administrative and Procurement Services pursuant to the *CCC Minority & Women Business Enterprise Contract Participation Plan* as referenced in Section 2.9 of the Board Policies and Procedures for Management & Government. Likewise, the Office of M/WBE Contract Compliance of the Department of Administrative and Procurement Services routinely failed to enforce such vendor reporting requirements. As a result, little, if any, monitoring of vendor compliance with M/WBE goals occurs during the course of a contract.
- The Office of M/WBE Contract Compliance failed to prepare and submit quarterly and annual reports concerning the status of CCC’s ability to be in compliance with its Board Approved M/WBE Participation Plan as required by Section 2.9(C) of the Board Policies and Procedures for Management & Government. Likewise, the Board of Trustees did not enforce such Office of M/WBE Contract Compliance of the Department of Administrative and Procurement Services reporting requirements.

- On occasion, CCC Professional Services Agreements failed to incorporate all terms contained in vendors' responses to Requests for Proposal which created a risk that CCC will not be able to legally bind vendors to such terms.

Based on the above findings, the OIG made the following recommendations:

- The OIG recommended that the Office of M/WBE Contract Compliance of the Department of Administrative and Procurement Services enforces all vendor reporting requirements of the *CCC Minority & Women Business Enterprise Contract Participation Plan* by:
  - Tracking whether vendors have submitted *Monthly and Quarterly Reports of Payments to MBE and WBE Subcontractors* and other required documents in a timely fashion;
  - Notifying vendors when they have failed to fulfill their reporting requirements under the *CCC Minority & Women Business Enterprise Contract Participation Plan*;
  - Initiating disciplinary action against vendors who fail to fulfill their reporting requirements under the *CCC Minority & Women Business Enterprise Contract Participation Plan*; and
  - Reviewing the *Monthly and Quarterly Reports of Payments to MBE and WBE Subcontractors* and other required documents to monitor whether CCC M/WBE goals to which vendors agreed are being met and to determine whether any failure to comply with M/WBE goals constitutes a material breach of the contract, potentially resulting in termination of the contract and other remedies.
- The OIG recommended that the Office of M/WBE Contract Compliance of the Department of Administrative and Procurement Services fulfills its quarterly and annual reporting requirements pursuant to Section 2.9(C) of the Board Policies and Procedures for Management & Government.
- The OIG recommended that the Board of Trustees ensures that the Office of M/WBE Contract Compliance of the Department of Administrative and Procurement Services consistently fulfills its quarterly and annual reporting requirements.
- The OIG recommended that the Office of the General Counsel revises the Professional Services Agreement template, as well as templates for all other types of agreements, to include the following:

- Appropriate language to ensure that all provisions to which vendors agree in responses to Requests For Proposals are specifically incorporated into executed agreements.
- Appropriate language in the MBE/WBE section which specifically provides that vendors must comply with all requirements of, including but not limited to the reporting provisions, of the *City Colleges of Chicago Minority & Women Business Enterprise Contract Participation Plan*.

In the interest of full exploration of the issues, the OIG provided a draft of its report documenting the review of CCC M/WBE Compliance Monitoring to the CCC Office of General Counsel and requested a response regarding the incorporation of M/WBE language in the Professional Services Agreement. The Office of General Counsel's response was that the Compliance with Laws section of contracts includes vendor agreement to adhere to all Board Rules, Policies and Procedures, including the MBE/WBE Participation Plan which can be found on the CCC website. However, going forward, contracts will include a provision that makes specific reference to: 1) MBE/WBE Plan requirements; 2) the CCC website address where the MBE/WBE Participation Plan is located; and 3) Schedule A of the MBE/WBE Participation Plan which includes the Vendor's Affidavit of MBE/WBE Goal Implementation.

The OIG also provided a draft of the report to the CCC Department of Administrative and Procurement Services and requested a response. In its response, the Department of Administrative and Procurement Services did not contradict any of the OIG's findings and recommendations and provided the department's M/WBE compliance monitoring plans for the future, which included the following:

- A technology solution to track M/WBE payments and improve monitoring of vendor compliance.
- The hiring of two contract compliance officers to monitor M/WBE compliance and enforce CCC's M/WBE Plan.
- Coordinating with the CCC Office of Information Technology to use Blackboard Connect as a notification system to prime and subcontractors for submitting quarterly payment information on M/WBE Compliance.
- Creating a new form for prime and subcontractors to report quarterly and annual payments on District contracts.
- Improving M/WBE tracking by collecting additional vendor data, which includes the board report number, date of award, description of services, certifying agency, direct or indirect participation, and the percentage and dollar amount committed for the participation.
- Developing a separate web page for M/WBE compliance to improve information available to vendors, and CCC's goals regarding M/WBE participation in CCC contracts.

### Review of Salary Lane IV Placements (OIG Case Number 11-0056)

As a result of a 2010 investigation of a full-time faculty member assigned to a City College, which revealed that due to the faculty member's misrepresentation of her educational background, the faculty member received in excess of \$307,000.00 during the course of her employment to which she was not entitled, the OIG initiated a review of the credentials of all full-time faculty members placed in the Lane IV compensation rate as of November 2010. The OIG found that the various CCC files maintained regarding these full-time faculty members contained insufficient documentation to support the placement of the faculty member in the Lane IV compensation rate in 31 of the 140 (22.1%) files reviewed. This insufficient documentation included a lack of documentation establishing that the faculty member earned the requisite credentials, a lack of original transcripts, and a lack of original evaluation reports of faculty members' foreign transcripts. Specifically, the OIG review revealed the following:

- The personnel files of 12 of 140 faculty members who were in the Lane IV compensation rate as of November 2010 lacked sufficient documentation evidencing that these faculty members earned the requisite credentials (i.e., either a Ph.D./Ed.D. or master's degree plus 60 hours of graduate credit) prior to placement in the Lane IV compensation rate.
- The personnel files of 12 of 140 faculty members who were in the Lane IV compensation rate as of November 2010 lacked original transcripts, and only contained copies of transcripts, documenting that these faculty members earned a Ph.D./Ed.D or master's degree plus 60 hours of graduate credit prior to placement in the Lane IV compensation rate.
- The personnel files of 7 of 140 faculty members who were in the Lane IV compensation rate as of November 2010 did not contain a credential evaluation report of these faculty members' foreign transcripts or only contained a copy of a credential evaluation report.

Based on this review, the OIG made the following recommendations:

- The OIG recommended that the CCC Office of Academic Affairs conducts a verification of the credentials of the 28 currently active faculty members whose personnel files did not evidence sufficient documentation to verify that they earned the requisite credentials prior to placement in the Lane IV compensation rate. At minimum, this verification process should include the following:
  - The submission of appropriate documentation by the faculty member which evidences that the faculty member earned the requisite credentials (i.e., either a Ph.D./Ed.D. or master's degree plus 60 hours

- of graduate credit) justifying placement in the Lane IV compensation rate.
  - In instances where original transcripts are not contained in any of the faculty members' employment records, the submission of original transcripts by the faculty member supporting the degrees / graduate hours represented as earned by the faculty member.
  - In instances where original credential evaluation reports of the faculty members' foreign transcripts are not contained in any of the faculty members' employment records, the submission by the faculty member of original credential evaluation reports of the faculty members' foreign transcripts.
  - A review of whether any purportedly earned in-service program hours are sufficiently documented and of an appropriate nature to be legitimately included as graduate credit.
- In order to limit the risk that CCC makes placement decisions relying on false or altered transcripts, the OIG recommended that only original transcripts be reviewed in the placement / advancement process and that the original transcripts be maintained in faculty members' personnel files.
  - In order to ensure that foreign transcripts have been properly evaluated and to limit the risk that CCC makes placement decisions relying on false or altered credential evaluation reports, the OIG recommended that only original credential evaluation reports be reviewed in the placement / advancement process and that the original credential evaluation reports be maintained in the personnel files of faculty members with foreign transcripts.

OIG Follow-up to Office of Internal Audit Review of Procurement Card Use by the Colleges during the period of July 2010 to June 2011 (OIG Case Number 12-0034)

The OIG conducted follow-up investigations regarding expenses deemed questionable by the CCC Office of Internal Audit during its review of expenditures via P-Cards issued to the various City Colleges during the period of July 2010 to June 2011. Regarding at least three of the expenditures involving two City Colleges, the OIG found that various CCC policies were violated. These expenditures became the subject of two separate investigative summaries which are summarized later in this *Bi-Annual Report* as OIG Case Number 12-0034(a) and as OIG Case Number 12-0034(b). The OIG findings regarding the other expenditures deemed questionable by the Office of Internal Audit are also documented below:

- A City College expended \$540.00 in hotel room upgrades for two advisors and a student (\$45.00 per night/per room) attending a Student Government Association conference, when the room rate for each of the other fourteen students who attended the conference matched the room rates documented

on the *Travel/Professional Conference/Local 1600 Tuition Reimbursement Request* form submitted prior to the trip.

- A City College expended a total of \$265.00 in airline “economy plus” seat upgrades for five students, contrary to the CCC Department of Finance Guidelines and Procedures for Meeting/Conference/Travel.
- A City College expended a total of \$367.58 for six gourmet gift baskets presented to members of a Higher Learning Commission evaluation team, contrary to the Article III, Section 1(a) of the Constitution of Illinois which requires that “public funds....shall be used only for public purposes. Section 1.3 of the Board Policies and Procedures for Management & Government, adopted on December 1, 2011, now provides that “gifts/flowers/gift cards” are unallowable expenditure types.
- Various expenditures were made which included sales tax, contrary to the CCC Purchasing Card Cardholder Guide. Section 1.13 of the Board Policies and Procedures for Management & Government, adopted on December 1, 2011, provides that every effort needs to be made to ensure that expenditures do not include sales tax.

The propriety of several of the expenditures, particularly food-related expenditures, was not clear based on CCC P-Card policies in effect at the time of the expenditures. Subsequently, the Board Policies and Procedures for Management & Government, adopted by the Board of Trustees on December 1, 2011, covered many of the issues noted during the OIG investigation of such expenditures. However, the OIG identified various CCC policies and procedures which should be amended to ensure that CCC financial records are completely and accurately maintained and to ensure compliance with the purchasing and contracting policies and procedures of the Board Policies and Procedures for Management & Government. The OIG made the following recommendations.

- In light of the fact that the vendor module of the PeopleSoft Finance system only tracks payments made to vendors via purchase orders but not payments by other payment methods, such as by P-Card or employee reimbursement, the OIG recommended that CCC develops a unified module/report to track/monitor all expenditures made, regardless of payment method, to ensure that expenditures to a single vendor do not exceed dollar thresholds set by state law and/or CCC policies requiring certain procurement processes (i.e. formal competitive bidding) and/or do not exceed the Board approved contract limits.
- The OIG recommended that the Guidelines and Procedures for Meeting/Conference/Travel be amended to require that a written explanation, approved by the department head and the executive director of business operations, be attached to the *Travel/Professional Conference/Local 1600*

*Tuition Reimbursement Request* form in instances where the spent travel/conference amount exceeds 10% of the approved estimated budget amount.

- In instances where extra items appear on the procurement card bank statement that were not pre-approved on the *Travel/Professional Conference/Local 1600 Tuition Reimbursement Request* form, the OIG recommended that the Guidelines and Procedures for Meeting/Conference/Travel be amended to require the cardholder to justify the additional items in writing and include the written justification with the Purchasing Card Form. If the additional items cannot be justified, the cardholder should be required to perform his/her due diligence and dispute the items if the items were not appropriately charged.
- Regarding expenditures justified as sponsorships/donations or community events having direct benefits to CCC students pursuant to Section 1.13 of the Board Policies and Procedures for Management & Government, the OIG recommended that Section 1.13 of the Board Policies and Procedures for Management & Government be amended to require a specific, signed statement detailing how the sponsorship/donation or community event has a direct benefit to CCC students, prior to the approval of the expenditure and/or reimbursement.

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

Pursuant to the provisions of Section 2.7.5 of the Board Bylaws, the following are summaries of the OIG investigations for which reports were submitted documenting sustained findings of waste, fraud or misconduct during the period of January 1, 2012 through June 30, 2012. These reports document thirteen investigations and recommend disciplinary or other action regarding twenty-six employees.

#### OIG Case Number 12-0016

The OIG received a complaint that the vice-president of a CCC department attempted to arrange for a CCC contract to be awarded to a company owned and operated by his wife. The OIG investigation revealed that the vice-president violated various provisions of the CCC Ethics Policy, specifically Sections 6(2) and 8(1), when contracts were awarded through the department to the company owned by his wife. Furthermore, during an interview with the OIG, the vice-president made at least two false statements, in violation of Section IV(8) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the vice-president be terminated. The OIG further recommended that the vice-president be designated ineligible to be re-hired and that his personnel records reflect this designation.

Following the disciplinary process, the Board of Trustees approved the termination of the vice-president. Also, the vice-president was designated ineligible to be re-hired.

Additionally, in order to fill a gap in the CCC Ethics Policy which precluded a recommendation of disciplinary action against the wife's company, the OIG recommended that the Board of Trustees amends the CCC Ethics Policy to provide that a contractor that is awarded a contract or otherwise benefits as a result of a CCC employee's violation of the CCC Ethics Policy, also violates the Ethics Policy and is therefore subject to debarment pursuant to Section 5.2.21 of the CCC Ethics Policy.

OIG Case Number 12-0034(a)

During the course of the OIG follow-up investigation regarding expenses deemed questionable by the CCC Office of Internal Audit during its review of expenditures for the period of July 2010 to June 2011 via P-Cards issued to the various City Colleges, the OIG reviewed two expenditures at a City College. The investigation revealed the following:

- A single purchase in excess of \$10,000.00 by a City College was split into multiple invoices / payments in order to circumvent the formal competitive bidding process required for such expenditures, in violation of Sections 1.02 and 1.03 of the CCC Operations Manual. Although the dollar threshold requiring formal competitive binding was changed to \$25,000.00 pursuant to the December 1, 2011 amendments to the Board Policies and Procedures for Management & Government, the manipulation of a purchase to avoid dollar thresholds nonetheless violated Section 2.2 of the Board Policies and Procedures for Management & Government.
- The executive director of business operations at the College and the chief engineer failed to submit a purchase for repairs in excess of \$10,000.00 but not more than \$15,000.00 to the Chancellor for approval, in violation of Section 1.07(J) of the CCC Operations Manual.
- The executive director and the chief engineer provided a misleading answer to a question on an information form provided to the CCC, in that they submitted a *Recapitulation of Bids Received* form inaccurately documenting the quotes received from two of three vendors, in violation of Section IV(6) of the CCC District-Wide Employee Manual.
- The executive director and the chief engineer failed to comply with CCC Board Rules or policies concerning procurement and purchasing of goods and services, in violation of Section IV(36) of the CCC District-Wide Employee Manual, in that they failed to submit a purchase for repairs in

excess of \$10,000.00 but not more than \$15,000.00 to the Chancellor for approval, in violation of Section 1.07(J) of the CCC Operations Manual.

- Regarding an unrelated expenditure, the executive director failed to select the lowest bidder after engaging in an informal competitive bidding process for a \$5,370.52 purchase, in violation of Section 1.01 of the CCC Operations Manual. Section 2.1 of the Board Policies and Procedures for Management & Government likewise provides that goods and nonprofessional services should be purchased from the vendor who can provide the required goods at the lowest price available.
- The chief engineer failed to report misconduct of another CCC employee, in that he failed to report that the executive director falsified a *Recapitulation of Bids Received* form, in violation of Section IV(46) of the CCC District-Wide Employee Manual.
- The executive director failed to report misconduct of another CCC employee, in that she failed to report that the chief engineer falsified a *Recapitulation of Bids Received* form, in violation of Section IV(46) of the CCC District-Wide Employee Manual.
- The executive director used her Procurement Card to pay an expense which included sales tax, contrary to the CCC Purchasing Card Cardholder Guide.

Based on the fact that the executive director resigned from her position months prior to the completion of the OIG investigation, the OIG recommended that the executive director be designated ineligible to be re-hired and that her personnel records reflect this designation. The OIG recommended that CCC takes appropriate disciplinary action against the engineer.

The executive director was designated ineligible to be re-hired. The chief engineer subsequently retired from employment with CCC and was designated ineligible to be re-hired.

The OIG further recommended that the prohibition against “stringing” language of Section 2.2 of the Board Policies and Procedures for Management & Government be amended to read as follows: “Splitting purchases to circumvent required approvals or to reduce the procedural requirements for obtaining multiple price quotes or bids is strictly prohibited and may be subject to disciplinary action.”

#### OIG Case Number 12-0034(b)

During the course of the OIG follow-up investigation regarding expenses deemed questionable by Office of Internal Audit during its review of expenditures via P-Cards issued to the various City Colleges, the OIG reviewed an expenditure for

the repair of a bus at a City College. The OIG found that the P-Card expenditure in the amount of \$3,029.42 by a City College was made without the required three written bid quotations being obtained. Specifically, the investigation revealed the following:

- The executive director of business operations at the City College and the director of security at that City College failed to obtain the required three written bid quotations for an expenditure of \$2,500.00 and up to \$10,000.00, in violation of Section 1.02 of the CCC Operations Manual.
- The executive director was incompetent in the performance of the duties of her position, in that she misrepresented the emergency nature of the circumstances surrounding the need to repair a City College vehicle in order to obtain the approval of the district director of business and procurement services, in violation of Section IV(39) of the CCC District-Wide Employee Manual.
- The executive director and the director of security failed to comply with CCC Board Rules or policies concerning procurement and purchasing of goods and services, in violation of Section IV(36) of the CCC District-Wide Employee Manual, in that they:
  - failed to obtain the required three written bid quotations for an expenditure of \$2,500.00 and up to \$10,000.00, in violation of Section 1.02 of the CCC Operations Manual.
  - failed to prepare / submit a *Recapitulation of Bids Received* form explaining their failure to obtain the three written bid quotations, in violation of Section 1.02 of the CCC Operations Manual.
  - failed to obtain at least one of the three quotes from a certified MBE or WBE vendor, in violation of Section 1.02 of the CCC Operations Manual.

Based on the fact that the executive director had resigned from her position months prior to the completion of the OIG investigation, the OIG recommended that the executive director be designated ineligible to be re-hired and that her personnel records reflect this designation. The OIG recommended that CCC takes appropriate disciplinary action against the director of security.

The executive director was designated ineligible to be re-hired. The director of security was given “verbal counseling”.

OIG Case Number 12-0020

During the course of an unrelated investigation, the OIG obtained an e-mail sent by a coordinator to three vocational lecturers which contained, in pertinent part, the following:

When I took over the program, you all asked if you could get a raise for labs as you hadn't gotten one. I was able to get you an increase for labs by being paid for three hours instead of the two you work per night..... If you weren't there for your labs because of illness, vacation, etc., I never docked you your pay. You were paid if you missed a day or not.

Based on the above e-mail, the OIG initiated an investigation regarding the attendance and payroll issues presented. The OIG investigation revealed that from at least the Fall 2010 semester through the Fall 2011 semester, the three vocational lecturers were in fact paid for three hours of work despite the fact that they only performed two hours or less of work. The OIG was told that the lecturers received pay for hours that they did not in fact work in lieu of a raise. Additionally, on at least one occasion, a vocational lecturer received pay for a day that he was not in fact at work, since the day off was not deducted from his pay. The actions of the lecturers violated Section IV, Paragraphs 17, 46, and 50 of the CCC District-Wide Employee Manual. Although during their interviews with the OIG, the lecturers stated that days off were not docked from their pay, no specific days could be identified.

The coordinator, who authored the e-mail, assumed a supervisory role in relation to the lecturers and allowed them to receive pay for hours / days that they did not in fact work. The coordinator's actions violated Section IV, Paragraphs 17, 46, and 50 of the CCC District-Wide Employee Manual.

A dean approved the Certificates of Attendance regarding the three lecturers which reflected hours that they did not in fact work. The dean's actions violated, at a minimum, Section IV, Paragraphs 39 and 50 of the CCC District-Wide Employee Manual.

The OIG investigation also revealed that the manner in which the program maintained its attendance and employment records was quite problematic in that:

- Despite the fact that Section 4.11(a) of Board Policies and Procedures for Management & Government, adopted December 1, 2011, specifically requires that "(a)ll District employees shall be required to complete and sign certificates of attendance in which they verify their attendance and hours of work during each pay period",<sup>4</sup> the Certificates of Attendance for the lecturers

---

<sup>4</sup> Prior to December 1, 2011, identical language could be found in Section 3.13(a) of the Board Rules for Management and Government.

were not signed by the lecturers. In fact, during interviews with the OIG, the lecturers stated that they had never seen a Certificate of Attendance.

- Despite the fact that the Lectureship Assignment forms are considered to be contracts and include a place for the lecturer to sign the contract, the Lectureship Assignment forms for lecturers were not signed by the lecturers.
- Despite the fact that the Certificates of Attendance are filled out by a clerk who relies on in-house time sheets or notes of the days / hours that the lecturers worked as assistant instructors, when the OIG asked for such in-house time sheets or notes, neither the program nor the College could locate the documents.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the coordinator, the dean and two of the three lecturers. One of the lecturers retired from her position prior to the conclusion of the investigation so no further disciplinary action was recommended. The OIG also recommended that CCC utilizes all legal but fiscally reasonable remedies, such as the docking of future pay from the two active employees, to recoup \$180.00 from one active lecturer, \$390.00 from the other active lecturer, and \$210.00 from the retired lecturer.

Following the disciplinary process, the coordinator was terminated from her coordinator position. The two lecturers were terminated from their lecturer positions. The dean was issued a written reprimand.

#### OIG Case Number 12-0053

The OIG received a complaint that an adult educator at a City College was employed by his aunt, who was the dean of adult education at the College. The OIG investigation revealed that the dean of adult education did in fact employ her nephew as an adult educator at the College. The OIG investigation revealed that the dean of adult education signed various CCC forms on behalf of her nephew, including a Personnel Action form approving the hiring of her nephew as a substitute adult educator and a Personnel Action form approving the promotion of her nephew to adult educator. Such action violated the CCC Ethics Policy, specifically Section 5.2.8(1)(i) of the Board Policies and Procedures for Management & Government as well as violated Section IV(44) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the dean of adult education. The OIG also recommended that either the dean or her nephew be transferred to a different department or to a different City College so that the dean was not employing or supervising her nephew in violation of the CCC Ethics Policy.

As a result of the OIG investigation, the dean of adult education retired from her position with CCC. Also, the dean was designated ineligible to be re-hired. Due to the retirement of the dean of adult education, the recommendation to transfer the nephew became moot.

#### OIG Case Number 11-0092

The OIG received a complaint that newly created scholarships at a program of a City College were inappropriately awarded to a faculty member and a student. Student scholarships are awarded through the City Colleges of Chicago Foundation (“Foundation”), a separate, not-for-profit, IRS approved 501(c)(3) that provides scholarship assistance each year to many students who otherwise would be unlikely to begin or complete their college education. The OIG investigation revealed that the Foundation lacked any specific policies and procedures regarding scholarship programs for which faculty and staff members are eligible. The OIG investigation also revealed that the Foundation lacked any specific policies and procedures regarding the types of expenses which are reimbursable under a scholarship and the documentation required to support reimbursable expenses.

The OIG investigation further revealed that a director at a City College violated the *City Colleges of Chicago & CCC Foundation Scholarship Programs: Policies & Procedures*, in that she failed to notify students who applied for but were not awarded scholarships. Additionally, the director violated the *City Colleges of Chicago & CCC Foundation Scholarship Programs: Policies & Procedures* in that she awarded a scholarship to a student who did not apply for the scholarship. She simply awarded the scholarship to the student because the student complained about not receiving any of the scholarships for which the student did apply but for which the student was not recommended.

Based on the investigation, the OIG recommended the following:

- The OIG recommended that CCC takes appropriate disciplinary action against the director.
- The OIG recommended that the *City Colleges of Chicago & CCC Foundation Scholarship Programs: Policies & Procedures* be amended to include the following:
  - Specific policies and procedures regarding scholarship programs for which faculty and staff are eligible.
  - The incorporation of reimbursement and travel policies and procedures which apply to CCC employees, including, at a minimum, the relevant portions of the following CCC policies:

- The *Reimbursement Policy* included in Section 1.13 of the Board Policies and Procedures for Management & Government, adopted December 1, 2011;
  - The Local Mileage Reimbursement & Other Local Transportation Policy, dated January 27, 2012;
  - Portions of the CCC Operations Manual, specifically Section 5.00, titled *Payment for Travel Reimbursement*, and Sections 6.00 through 6.05, titled *Travel*; and
  - The *Conference, Seminar or Training Leave Travel Request Form* found in the Department of Finance section of the employee portal of the CCC website.
- The OIG recommended that the Foundation refrains from approving any faculty or staff scholarships until the *City Colleges of Chicago & CCC Foundation Scholarship Programs: Policies & Procedures* are amended to provide policies and procedures regarding the awarding of faculty and staff scholarships and for the reimbursement of expenses.
  - The OIG recommended that the creation, review and award of all Foundation scholarships for the benefit of students, staff or faculty of the program be processed through the College's scholarship committee.
  - The OIG recommended that the Foundation releases no more than \$2,778.52 in scholarship funds to the faculty member. This amount represents the cost of the two programs attended by the faculty member, airline and ground transportation fees, and some meal-related expenses. The faculty member requested \$3,020.69, but the OIG found various items for which the faculty member should not receive reimbursement.
  - The OIG recommended that the Foundation withholds the \$500.00 in scholarship funds awarded to the student due to the fact that she did not apply for the scholarship and she was rejected by at least two of the three faculty members who reviewed her application for another scholarship for which she did apply.

Following the disciplinary process, the director was suspended for a period of two days.

#### OIG Case Number 11-0100

The OIG received a complaint that a lecturer assigned to a City College submitted various Certificates of Attendance reflecting overlapping time for the same pay periods and received compensation for all of the hours. The OIG

investigation revealed that the lecturer received and accepted pay to which she was not entitled. Specifically, the OIG investigation revealed the following:

- In numerous instances, during the time period of the 2009 Fall semester through the 2011 Fall semester, the lecturer received and accepted duplicate pay, in that she received pay both as contract pay and as regular pay for the same hours.
- In numerous instances, during the time period of the 2009 Fall semester through the 2011 Fall semester, the lecturer received and accepted pay for hours which partially overlapped between her contract hours and her regular/extra hours.
- In numerous instances, during the time period of the 2009 Fall semester through the 2011 Fall semester, the lecturer received and accepted pay for hours which overlapped between her CCC hours and her hours at her outside employment with a hospital.
- The lecturer was not required by college staff or her superiors to prepare or sign any of the Certificates of Attendance contrary to Section 3.13 of the Board Rules for Management & Government, in effect at the time.

The OIG recommended that CCC take appropriate disciplinary action against the lecturer for misappropriating CCC funds. The OIG also recommended that CCC take appropriate disciplinary action against a college clerical assistant II, a coordinator II and a dean for their parts in preparing and/or approving the Certificates of Attendance which enabled the lecturer to receive the duplicate pay. Two program directors who were also involved were no longer employed by CCC; therefore, the OIG made no further recommendation regarding them. Additionally, the OIG recommended that CCC utilizes all legal but fiscally reasonable remedies to recoup as much as \$11,489.89 from the lecturer for pay in which she received but to which she was not entitled.

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

#### OIG Case Number 12-0006

The OIG received a complaint that a full-time faculty member at a City College, who also served as a program director at the College, provided inaccurate data on behalf of the College to an accrediting body. The OIG investigation revealed that on numerous annual reports submitted on-line to the accrediting body, the program director provided false answers to questions, in violation of Section IV(6) of the CCC District-Wide Employee Manual. The OIG investigation also revealed that the program director was inattentive to her duty as a program director and was incompetent in the performance of her duties in that she failed to administer

programmatic outcome exams to students who completed the program in 2005 and 2010, in violation of Section IV(38) and (39) of the CCC District-Wide Employee Manual.

Based on this investigation and the investigation discussed below (OIG Case Number 12-0010), the OIG recommended that CCC takes appropriate disciplinary action against the program director. The OIG also recommended the following:

- The OIG recommended that CCC adopts a policy and procedure to require that an individual in the position of the dean or above be responsible for reviewing and verifying the data on all documents, including annual reports, submitted on behalf of a City College to any accrediting body. This will ensure that there are checks and balances in place to prevent the submission of inaccurate and conflicting data to such organizations.
- The OIG recommended that CCC adopts a policy requiring all College programs, particularly programs where programmatic outcome exam data is required to be reported to an accrediting body, to annually input data into the CCC PeopleSoft Student Administration System documenting graduates' participation in programmatic outcome exams and their exam results.

As of the date of this *Bi-Annual Report*, the disciplinary process regarding the full-time faculty member is pending.

#### OIG Case Number 12-0010

The OIG received a complaint, regarding the same program director discussed above (OIG Case Number 12-0006), that the program director misappropriated fees that she collected from students in her program at the College. The OIG investigation revealed the following:

- The program director misappropriated \$107.00 of CCC funds, in that she did not tender to the appropriate vendors or could not otherwise account for these funds that she collected from applicants/students, in violation of Section IV(17) of the CCC District-Wide Employee Manual.
- The program director made various purchases without submitting a requisition to the College's business office, contrary to Section 1.02.1 of the CCC Operations Manual which was in effect at the time, that the program director made these purchases; therefore, she also failed to comply with CCC Board Rules or policies and departmental policies concerning procurement and purchasing of goods and services, in violation of Section IV(36) of the CCC District-Wide Employee Manual.
- The program director wasted \$50.00 of CCC funds, in that she failed to deposit a \$25.00 check and a \$25.00 money order with the College's

business office in a timely manner and before the accounts on which these negotiable instruments were drawn were closed, in violation of Section IV(37) of the CCC District-Wide Employee Manual.

- For various reasons as documented in the investigation, the program director was inattentive to her duty as the program director, in violation of Section IV(38) of the CCC District-Wide Employee Manual, and was incompetent in the performance of her duties, in violation of Section IV(39) of the CCC District-Wide Employee Manual, including the following:
  - The program director collected various fees from applicants to and students in the program despite the fact that she was not assigned to or authorized to do so by the College's business office, in violation of Section 12.00 of the CCC Operations Manual, which was in effect at the time that she collected these fees.
  - The program director initiated and collected a \$25.00 fee from applicants to the College's program without the fee being approved by the Board of Trustees, in violation of Index Number 2.31B of the CCC Academic Policy.

Based on this investigation and the investigation previously discussed (OIG Case Number 12-0006), the OIG recommended that CCC take appropriate disciplinary action against the program director.

As of the date of this *Bi-Annual Report*, the disciplinary process regarding the full-time faculty member is pending.

#### OIG Case Number 12-0171

The OIG received a complaint that a full-time faculty member assigned to a City College, who also served as a department chair, was falsifying his attendance records by representing that he taught the last hour of a course which he shared teaching responsibilities with a lecturer, when in fact he did not teach that last hour. The OIG investigation revealed the following:

- The full-time faculty member falsely represented the quantity of work performed, in that he signed Certificates of Attendance which reflected that he was teaching the last hour of a course during the 2012 Spring semester when in fact he did not teach the last hour of the course for as much as two months during the 2012 Spring semester, in violation of Section IV(7) of the CCC District-Wide Employee Manual. Likewise, the full-time faculty member failed to correct Certificates of Attendance which did not accurately document the days that he taught the last hour of the course during the 2012 Spring semester, in violation of Section 4.11(c) of the Board Policies and Procedures for Management & Government.

- The lecturer erroneously received both substitute pay and pay pursuant to a *Lectureship Assignment* for teaching the same exact hours during the 2012 Spring semester resulting in the lecturer receiving \$393.72 in pay to which she was not entitled.
- Another lecturer erroneously received \$1,151.76 in pay to which he was not entitled due a clerk's failure to accurately pro-rate the pay he received pursuant to a *Lectureship Assignment* for teaching ten weeks of a course during the 2012 Spring semester.
- The vice president of the City College was inattentive to her duty, in that she approved inaccurate Certificates of Attendance regarding the full-time faculty member without properly investigating their accuracy, in violation of Section IV(38) of the CCC District-Wide Employee Manual.
- A college administrative assistant was inattentive to her duty, in that she failed to accurately pro-rate the pay received by the lecturer pursuant to a *Lectureship Assignment* resulting in the lecturer receiving more than \$1,100.00 in pay to which he was not entitled, in violation of Section IV(38) of the CCC District-Wide Employee Manual.
- A college clerical assistant had full-time faculty members sign blank Certificates of Attendance after which she would fill in their purported work hours based on their schedules and not the hours that they actually worked, in violation of Section 4.11(a) of the Board Policies and Procedures for Management & Government.

Based on the OIG investigation, the OIG recommended the following:

- The full-time faculty member retired from his position with CCC; therefore, the OIG did not recommend any other disciplinary action against the full-time faculty member.
- The OIG recommended that CCC takes appropriate disciplinary action against the vice president of the City College, the college administrative assistant, and the college clerical assistant.
- The OIG recommended that CCC utilizes all legal but fiscally responsible remedies, such as the docking of future pay, to recoup \$393.72 from one of the lecturers and \$1,151.76 from the other lecturer.
- The OIG recommended that the City College immediately ceases the practice of having employees sign blank Certificates of Attendance while clerks enter purported time worked based on employees' schedules. The OIG further recommended that the City College immediately implements, abides by, and enforces Section 4.11 of the Board Policies and Procedures for Management

& Government which sets forth the CCC policy regarding the proper preparation of Certificates of Attendance.

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

OIG Case Number 11-0084

The OIG received a complaint that a City College administrator resided outside the City of Chicago. The OIG investigation revealed that the administrator resided in Calumet City, Illinois, in violation of Section 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation further revealed that the administrator falsified employment records, in that on a CCC residency certification document, the administrator fraudulently affirmed that she resided in Chicago, Illinois when in fact he resided in Calumet City, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Based on the investigation and the fact that the administrator was scheduled to retire from employment with the CCC a week after the OIG's report documenting her misconduct was submitted, the OIG recommended that the administrator be designated ineligible to be re-hired and that her personnel records reflect this designation.

The administrator was designated ineligible to be re-hired following her retirement.

OIG Case Number 11-0123

The OIG received a complaint that a janitor supervisor assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the janitor supervisor resided in Oak Lawn, Illinois, in violation of Section 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation further revealed that the janitor supervisor falsified employment records, in that on a CCC residency certification document, the janitor supervisor fraudulently affirmed that he resided in Chicago, Illinois when in fact he resided in Oak Lawn, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the janitor supervisor be terminated. The OIG further recommended that the janitor supervisor be designated ineligible to be re-hired and that his personnel records reflect this designation.

Following the disciplinary process, the Board of Trustees approved the termination of the janitor supervisor. Also, the janitor supervisor was designated ineligible to be re-hired.

OIG Case Number 11-0132

The OIG received a complaint that a janitor assigned to the District Office resided outside the City of Chicago. The OIG investigation revealed that the janitor resided outside the City of Chicago in Romeoville, Illinois, in violation of Section 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation further revealed that the janitor falsified employment records, in that on a CCC residency certification document, the janitor fraudulently affirmed that she resided in Chicago, Illinois when in fact she resided in Romeoville, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual. Additionally, during an interview with the OIG, the janitor made at least two false statements, in violation of Section IV(8) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the janitor be terminated. The OIG also recommended that the janitor be designated ineligible to be re-hired and that her personnel records reflect this designation.

Following the disciplinary process, the Board of Trustees approved the termination of the janitor. Also, the janitor was designated ineligible to be re-hired.

OIG Case Number 12-0022

The OIG received a complaint that a full-time faculty member assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the full-time faculty member resided in Homewood, Illinois, in violation of Section 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual. The OIG investigation further revealed that the full-time faculty member falsified employment records, in that on a CCC residency certification document, the full-time faculty member fraudulently affirmed that she resided in Chicago, Illinois when in fact she resided in Homewood, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the full-time faculty member be terminated. The OIG also recommended that the full-time faculty member 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 full-time faculty member is pending.

# REPORT

## WASTE . FRAUD . MISCONDUCT

regarding City Colleges of Chicago officials, employees, or those doing business with the City Colleges to the Office of the Inspector General

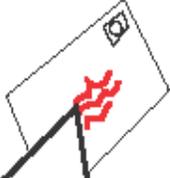
**OIG Fraud Hotline**



312.553.3399



InspectorGeneral@ccc.edu



**Office of the Inspector General**  
11 South LaSalle Street  
Suite 1740  
Chicago, Illinois 60603



ATTN:  
Inspector General

**FAX**  
312.553.3418

FILE an electronic complaint  
with OIG

[www.ccc.edu](http://www.ccc.edu)

**Office of the Inspector General  
City Colleges of Chicago**

Your report can be made  
ANONYMOUSLY or in CONFIDENCE