

Office of the Inspector General City Colleges of Chicago

Office of the Inspector General Bi-Annual Report January 1, 2015 – June 30, 2015

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

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To: Cheryl L. Hyman, Chancellor
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From: John A. Gasiorowski, Inspector General

Date: August 18, 2015

RE: *OIG Bi-Annual Report* for the period of January 1, 2015 through June 30, 2015

This *Bi-Annual Report* is being provided to the Chancellor and the Board of Trustees of Community College District No. 508 pursuant to Article 2.7.5 of the Board Bylaws. This *Bi-Annual Report* covers the period of January 1, 2015 through June 30, 2015. Pursuant to Article 2.7.5, the *Bi-Annual Report* for the period of January 1st through June 30th is required no later than September 1st each year.

Article 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.

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 Previous Bi-Annual Reports

Criminal conviction as a result of OIG investigation (OIG Case Number 14-0126)

As reported in the Bi-Annual Report for the period of July 1, 2013 through December 31, 2013, an OIG investigation revealed that during the criminal history verification stage of the CCC application process, a job applicant submitted altered (forged) court documents to CCC in order to make it appear as if his felony conviction for criminal sexual assault was expunged/sealed when in fact it was not. The job applicant submitted these false court documents in an attempt to justify his fraudulent misrepresentation on his job application that he was never convicted of a felony offense. Being that the job applicant’s submission of altered court documents to CCC constituted forgery, as defined by Section 17-3 of the Illinois Criminal Code (720 ILCS 5/17-3), the OIG submitted the results of this investigation to the Cook County State’s Attorney’s Office for review for possible criminal prosecution.

In January 2015, the job applicant was indicted by a Cook County Grand Jury and charged with multiple counts of the felony offense of forgery under criminal

case number 15CR0182101. On May 28, 2015, the job applicant pled guilty to one count of the felony offense of forgery in the Circuit Court of Cook County. The job applicant was sentenced to serve an 18-month term of probation.

Updates regarding disciplinary recommendations made during the July 1, 2014 to December 31, 2015 reporting period

In the *Bi-Annual Report* submitted for the July 1, 2014 to December 31, 2014 reporting period, the OIG submitted 16 reports documenting 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 documents updates of disciplinary actions recommended by the OIG regarding CCC employees as well as the actions taken by CCC.

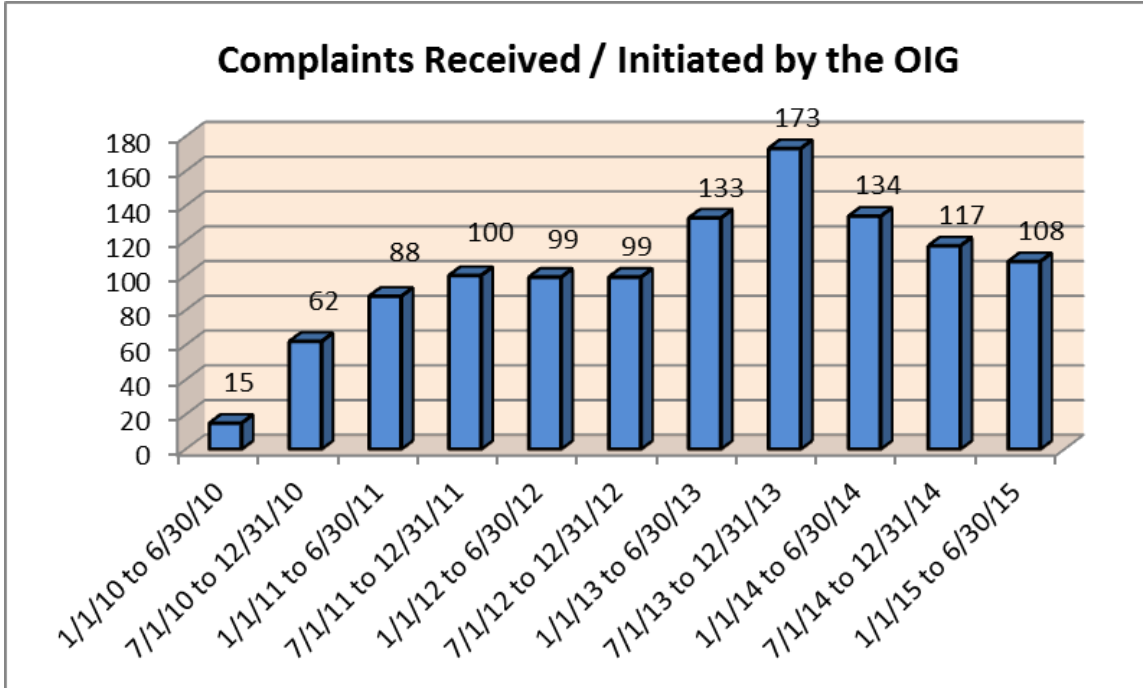
Updates Regarding Disciplinary Action Recommended during July 1, 2014 through December 31, 2014			
Case Number	Subject	Recommended Action	Action Taken
14-0304	Coordinator	Termination / DNRH ¹	Termination / DNRH
14-0294	Security Officer	Termination / DNRH	Termination / DNRH
14-0300	College Clerical Assistant II	DNRH (following resignation)	DNRH
14-0135	Full-Time Faculty	Appropriate Discipline	Verbal Warning
14-0306	Director	Appropriate Discipline	Verbal Warning
14-0294	Director	Appropriate Discipline	Oral Reprimand
14-0294	Administrator	Appropriate Discipline	None
15-0024	Security Officer	Termination / DNRH	Resignation / DNRH
15-0058	Assistant Teacher	Appropriate Discipline	None
15-0058	Director	Appropriate Discipline	None
15-0048	Full-Time Faculty	Appropriate Discipline	Written Warning
14-0303	Lecturer	Termination / DNRH	Termination / DNRH
15-0087	Security Officer	Transfer	None ²
15-0046	Security Officer	Reclassify / Adjust Pay	Reclassified / Pay Adjusted
15-0080	Security Officer	Reclassify / Adjust Pay	Reclassified / Pay Adjusted
15-0030	Manager	Termination / DNRH	Termination / DNRH
15-0056	Director	Termination / DNRH	Termination / DNRH
15-0071	Lecturer	Termination / DNRH	Termination / DNRH
15-0071	Lifeguard	Termination / DNRH	Termination / DNRH

¹ “DNRH” means “do not re-hire.” In such cases, the employee is designated ineligible to be rehired, and such designation is documented in the employee’s personnel records.

² The necessity of transferring the security officer became moot due to the resignation of his brother-in-law, the director of security, who was therefore no longer the security officer’s supervisor contrary to the CCC Ethics Policy.

Complaints Received

For the period of January 1, 2015 through June 30, 2015, the OIG received 108 complaints. These 108 complaints included complaints forwarded to the OIG from outside sources as well as investigations (or audits/reviews) initiated based on the OIG’s own initiative.³ For purposes of comparison to the number of complaints received during the period of January 1, 2015 through June 30, 2015, the following table documents the complaints received by the OIG during previous reporting periods.



The 108 complaints received represent a variety of subject matters. The table to follow documents the subject matters of the complaints received.

³ 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....(emphasis added).

Subject Matter of Complaints Received between January 1, 2015 and June 30, 2015		
Subject Matter (Allegation)	Number	%
Discourteous treatment	3	3%
Retaliation	4	4%
Engaging in conduct in violation of the Illinois Compiled Statutes	5	5%
Fraud (including financial aid / tuition)	5	5%
Fraud in securing employment / Falsification of employment records	5	5%
OIG initiated reviews	5	5%
Violation of the CCC Ethics Policy	6	6%
Conduct unbecoming a public employee	7	6%
Violation of miscellaneous CCC policies	8	7%
Inattention to duty	9	8%
Sexual or other harassment / Discrimination	11	10%
Misappropriation of funds / Theft	12	11%
Falsification of attendance records	13	12%
Residency / Annual Residency Compliance Audit	15	14%
Totals	108	100%⁴

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of December 31, 2014, the OIG had 111 complaints that were pending, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of January 1, 2015 through June 30, 2015, the OIG closed 131 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 or the OIG investigation was deferred to an investigation being conducted by another appropriate CCC department (for example, the CCC Equal Employment Opportunity Office); the complaint was a duplicate of a complaint previously received; 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 131 complaints during the current reporting period.

⁴ The total percentage may not equal 100% exactly due to rounding.

Complaints Closed between January 1, 2015 and June 30, 2015		
Reason Closed	Number	%
Sustained	17	13%
Not Sustained / No Policy Violation	64	49%
Referred / Deferred	26	20%
Duplicate Complaint	7	5%
Employee previously disciplined for same conduct	3	2%
Subject Inactive	13	10%
Completed Annual Residency Compliance Audit (2015)	1	1%
Total	131	100%

Regarding the complaints closed during the period of January 1, 2015 to June 30, 2015, the table below documents the number of calendar days between the date that the complaint was received and the date that the complaint was closed as compared to the average number of calendar days between the date that complaints were received and the date that complaints were closed for the complaints closed during the previous reporting period (July 1, 2014 through December 31, 2014).⁵

Reason Closed	7/1/14 to 12/31/14		1/1/15 to 6/30/15	
	Number	Average Days to Close	Number	Average Days to Close
Sustained	15	130	17	220
Not Sustained / No Policy Violation	67	369	64	245
Not Sustained with Recommendations	1	29	0	0
Referred / Deferred	35	1	26	1
Other	23	161	24	156
Totals	141		131	

As of June 30, 2015, the OIG had 88 pending complaints. Thirty-eight of these 88 pending complaints (43%) were received between January 1, 2015 and June 30, 2015, and 18 of these 88 pending complaints (20%) were received between July 1, 2014 and December 31, 2014.

⁵ A complaint is considered closed only after the investigative activity of the investigator to whom the complaint was assigned has been reviewed and approved by a Supervising Investigator and the Inspector General. In situations where a complaint is sustained, the complaint is not considered closed until the Investigative Summary documenting the investigation is prepared and submitted pursuant to Section 2.7.3 of the Board Bylaws.

OIG Reports Submitted – January 1, 2015 through June 30, 2015

During the reporting period of January 1, 2015 through June 30, 2015, the OIG submitted 20 reports, known as Investigative Summaries.⁶ These 20 reports included the Annual Certification of Residency Audit and 19 Investigative Summaries documenting sustained findings of waste, fraud and/or misconduct.

Annual Certification of Residency Audit (OIG Case Number 15-0134)

Under the heading *Annual Certification of Residency*, Article 4.6(a) of the Board Policies and Procedures for Management & Government, which sets forth the CCC Residency Policy, provides that on February 1st of each year every full-time CCC employee will be required to certify their compliance with the 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, Article 4.6(a) provides that "the Inspector General shall conduct an annual audit of the District's compliance with this Policy 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 1st of each year."

On February 9, 2015, all full-time employees of CCC were sent an e-mail regarding the need to certify their residency for 2015 by completing the online *Annual Certification of Residency* form. The e-mail was sent to 2,293 full-time employees.

By April 17, 2015, 2,266 of the 2,293 (98.8%) of the active full-time CCC employees responded to the Annual Certification of Residency process, while 100% of the full-time employees who were active and working during the 2015 certification of residency process responded. The table below documents the responses received:

⁶ 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.

Response	Number	%
No response due to employee being on a leave of absence	12	0.52%
No response due to termination of employee.	13	0.57%
No response – Sabbatical leave	1	0.04%
No response – No longer a full-time employee	1	0.04%
1. Required to be a resident, with correct address ⁷	2194	95.68%
2. Not required to be a resident, with correct address	14	0.61%
3. Required to be a resident, with incorrect address	11	0.48%
4. Not required to be a resident, with incorrect address.	0	0.00%
5. Required to be a resident, but does not currently live within the City of Chicago.	47	2.05%
Totals	2,293	100%

On May 14, 2015, the OIG submitted the results of the 2015 Audit of Compliance with the District’s Residency Requirement. The OIG audit revealed the following:

- Regarding the 47 employees who responded that they were required to be residents but did not currently reside within the City of Chicago, the OIG determined the following:
 - Twenty-six of the employees were employed for less than six months or previously received approved extensions.
 - Three of the employees submitted a City of Chicago residence in the PeopleSoft system subsequent to submitting their recorded response.
 - The OIG determined that 18 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 many of these employees appear to reside within the City of Chicago and no doubt checked the wrong box on the Annual Certification of Residency online form.
- Regarding the 14 employees who responded that they were not required to be a resident of the City of Chicago, all 14 of these employees fell within an exception to the residency requirement.
 - Seven of these 14 employees were hired before July 1, 1977.
 - Five of these 14 employees were exempt from the CCC Residency Requirement due to side letter agreements.
 - One of these 14 employees was employed for less than six months.
 - One of these 14 employees previously received an approved extension.

Based on the analysis conducted during the course of the 2015 Audit of Compliance with the District’s Residency Requirement, the OIG initiated five investigations.

⁷ The blank Certification of Residency form is pre-populated with the employee’s address as reflected in the CCC PeopleSoft system.

Reports Submitted Documenting Sustained Findings of Waste, Fraud and/or Misconduct

Pursuant to the provisions of Article 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, 2015 through June 30, 2015.

OIG Case Number 15-0098 (Employees A, B, and C)

The OIG was informed by the director of security at a City College that numerous textbooks were reported as stolen from instructors at the City College. The OIG investigation revealed that during the period of July 14, 2014 through January 13, 2015, three employees of the City College sold numerous textbooks, in exchange for cash, to a book store located in the immediate area of the City College. None of these textbooks were owned by these employees. The table to follow summarizes the textbooks sold by these individuals during the period of July 14, 2014 through January 13, 2015:

Textbook Sales from July 14, 2014 through January 13, 2015		
Seller	Textbooks Sold	Cash Received
Employee A	294	\$10,257.00
Employee B	49	\$1,782.50
Employee C	47	\$2,040.75

Employee A was a college clerical supervisor I. Employee B was a college clerical assistant II. Employee C was a college clerical assistant II.

The above table represents just a fraction of these individuals' illicit textbook sales, as Employee A and Employee C admitted to selling textbooks as far back as 2013, and Employee B recalled selling textbooks to the book store as early as the spring of 2014. Furthermore, all three individuals also sold textbooks to book buyers.

Of the 294 textbooks that Employee A sold, the topics that the textbooks covered included nearly every academic discipline provided at the City College. Particularly popular topics among the textbooks that Employee A sold over this nearly six-month period included humanities & music, applied sciences, business, mathematics & computer information systems, physical sciences, and biological sciences textbooks. Employee B mainly sold textbooks concerned with the academic discipline of the department to which she was assigned. Likewise, Employee C mainly sold textbooks concerned with the academic discipline of the department to which he was assigned.

The OIG investigation documented numerous reports of textbooks reported as missing from instructors' offices. The timing of the disappearance of a significant

number of these textbooks coincided with subsequent sales of the same titles at the book store by Employee A, Employee B, and/or Employee C.

During the course of the investigation, the OIG also searched Employee A's cubicle and a records room used by the department to which Employee A was assigned. These searches revealed textbooks scattered beneath Employee A's desk, and five boxes of textbooks in the records room. Two of the five boxes in the records room were observed in Employee A's cubicle before they were rediscovered in the records room at a later date.

During the course of the investigation, the OIG marked numerous textbooks in the library of desk copies utilized by the department to which Employee B was assigned. This library of textbooks is intended to be used by instructors assigned to that department. Fourteen of these marked textbooks were subsequently recovered from amongst the textbooks that Employee A and Employee B sold to the book store.

The OIG investigation further revealed that Employee B ordered textbooks for the library of desk copies for the department to which she was assigned. Almost immediately upon receiving such textbooks, Employee B and Employee A sold a significant portion of these textbooks to the book store.

The OIG investigation revealed that Employee C sold the textbooks to the book store under a self-admitted alias. Employee C claimed that he was either given the textbooks that he sold or that he only sold textbooks that were not used by the department. However, only three people were in charge of the department textbooks during the timeframe that Employee C worked in the department: a former department chairperson, the current department chairperson, and a coordinator. Of these three individuals, the coordinator only gave Employee C one textbook, and the former department chairperson lent Employee C two outdated textbooks. However, an analysis of Employee C's sales history to the book store during the nearly six-month period reveals that Employee C sold 47 textbooks to the store. Most of these textbooks were textbooks currently used by the department to which he was assigned, and on some occasions, he sold more than one of these titles.

Moreover, of the 47 textbooks sold, Employee C had another CCC employee sell eight of the textbooks to the book store. However, employee C ultimately received and kept all of the money received from the sales of these eight textbooks.

The OIG investigation also revealed that on many occasions, the three employees sold the textbooks to the book store while they were clocked in as working at the City College. Specifically, Employee A sold books at the book store on 61 occasions when he was clocked in as working. Employee B sold books at the book store on six occasions when she was clocked in as working

and on one occasion when using sick time. Employee C sold books at the book store on six occasions when he was clocked in as working and on two occasions when using sick time.

In sum, Employee A, Employee B, and Employee C violated, oftentimes on numerous occasions, Section IV, Paragraphs 2, 7, 15, 19, 38, and 50 of the CCC District-Wide Employee Manual. Additionally, Employee B also violated Section IV, Paragraph 13 of the CCC District-Wide Employee Manual, and Employee C also violated Section IV, Paragraphs 8 and 13 of the CCC District-Wide Employee Manual.

Prior to the date that the OIG submitted its findings regarding this investigation but after each employee was interviewed by the OIG, all three employees resigned from their positions with CCC, and all three employees were designated ineligible to be re-hired. Based on the fact that all three employees resigned from their positions with CCC, and all were designated ineligible to be re-hired, the OIG made no additional recommendations regarding these individuals.

The OIG submitted the results of this investigation to the Cook County State's Attorney's Office for review for possible criminal prosecution.

OIG Case Number 15-0098 (Employees D and E)

During the course of the investigation into numerous textbook thefts at a City College, as previously documented in this Bi-Annual Report under OIG Case Number 15-0098 (Employees A, B and C), the OIG became aware of suspicious activities regarding textbooks by a college clerical assistant II assigned to a different City College ("Employee D"), and a college storekeeper also assigned to that City College ("Employee E").

The OIG investigation revealed that in 2010, Employee D, while a CCC employee, was convicted of retail theft for attempting to steal merchandise from a Best Buy. Because she was convicted of retail theft, Employee D violated Section IV(15) of the CCC District-Wide Employee Manual. Furthermore, because she failed to report her conviction to anyone at CCC, Employee D violated Section III of the CCC District-Wide Employee Manual.

The OIG investigation further revealed that Employee D, in conjunction with Employee E, engaged in countless instances of wrongdoing regarding her textbook selling activities. Primarily, but not exclusively, Employee D and Employee E fraudulently obtained the textbooks by placing orders for desk copies from a publisher. Oftentimes when doing so, the duo utilized others' accounts with the publisher, usually by misrepresenting themselves to be former CCC employees. Employee E, using the access that his CCC position gave him, then provided these textbook deliveries to Employee D, who sold these textbooks on behalf of herself and Employee E. Usually Employee D sold these textbooks

to a book store located in the Loop, but she also sold textbooks to an online book store and to book buyers who visited the City College. At the Loop book store alone, these activities resulted in at least \$15,088.00 of sales. In addition to the textbooks that Employee D and Employee E ordered, Employee E provided Employee D with textbooks from deliveries that were intended for other recipients at the City College.

Furthermore, during his interview with the OIG regarding these activities, Employee E made at least three false statements. These false statements constituted three violations of Section IV(8) of the CCC Employee Manual.

Moreover, Employee D conducted at least 23 sales transactions at the Loop book store while she was clocked in as working. By conducting these transactions, Employee D: a) falsified her attendance records; b) left her City College without proper authorization; c) falsely represented to her superior the quality and/or quantity of work she performed; and d) was inattentive to her duties. Additionally, Employee D conducted at least four sales transactions at the Loop book store while utilizing sick leave. By conducting these transactions while utilizing sick leave, Employee D used sick leave in an unauthorized manner, in violation of Section IV(13) of the CCC District-Wide Employee Manual.

In sum, Employee D violated, oftentimes on numerous occasions, Section IV, Paragraphs 2, 7, 11, 13, 15, 21, 38, and 50 of the CCC District-Wide Employee Manual and the "Criminal History Verification and Post-Employment Convictions" provision of Section III of the CCC District-Wide Employee Manual. Likewise, Employee E violated, oftentimes on numerous occasions, Section IV, Paragraphs 8, 15, 21, 48, and 50 of the CCC District-Wide Employee Manual.

Prior to the date that the OIG submitted its findings regarding this investigation but after both employees were interviewed by the OIG, both employees resigned from their positions with CCC, and both employees were designated ineligible to be re-hired. Based on the fact that both employees resigned from their positions with CCC, and all were designated ineligible to be re-hired, the OIG made no additional recommendations regarding these individuals.

The OIG submitted the results of this investigation to the Cook County State's Attorney's Office for review for possible criminal prosecution.

OIG Case Number 15-0106

The OIG received a complaint that a full-time faculty member assigned to a City College was also working full-time for a local hospital. The OIG investigation revealed that on numerous occasions during the Fall 2014 term, the faculty member was on duty with and being paid by the local hospital at the same time that he was to conduct scheduled clinical classes at the hospital or to perform

scheduled office hours at a CCC facility on behalf of CCC. More specifically, the OIG investigation revealed the following:

- On 14 days, the faculty member's scheduled class times overlapped with the hours that the faculty member worked at the hospital. The amount of overlapping time on these 14 days averaged 7.76 hours per instance and totaled more than 108 hours.
- On 11 days, the faculty member's scheduled office hours overlapped with the hours that he worked at the hospital. The amount of overlapping time on these 11 days averaged about 45 minutes per instance and totaled more than eight hours.
- The sum of the faculty member's scheduled class times and the faculty member's scheduled office hours which overlapped with the hours that the faculty member worked at the hospital exceeded 117 hours.
- At the faculty member's rate of pay for the 2014 Fall term, the value of the time that the faculty member was paid by both CCC and the hospital for the same hours was more than \$11,800.00.

The above actions by the faculty member violated Section IV, Paragraphs 7, 11, 12, 42, and 50 of the CCC District-Wide Employee Manual, as well as the outside employment provisions of Section III of the CCC District-Wide Employee Manual.

Moreover, the OIG investigation revealed that during the Fall 2014 term, if not longer, the faculty member was a full-time employee of the hospital as well as a full-time faculty member with CCC. As such, the faculty member violated the outside employment provision of Article VIII of the Agreement between the Board of Trustees of Community College District No. 508 and the Cook County College Teachers Union, Local 1600, which prohibits persons in a full-time position with CCC from continuing, or at a future date accepting, a concurrent full-time position or positions equal to a full-time position with any other employer or employers while teaching full-time with the City Colleges of Chicago.

Additionally, during an interview with the OIG, the faculty member made several false statements. As such, the faculty member violated Section IV(8) of the CCC District-Wide Employee Manual.

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

Lastly, based on the findings in this investigation, the findings in a simultaneously submitted investigation (See OIG Case Number 15-0104 below), and previous investigations documenting similar time and attendance issues regarding CCC faculty members who teach off-campus clinical classes, the OIG recommended that CCC develops and implements a policy prohibiting faculty members from

teaching off-campus clinical classes at any facility at which the faculty member is also engaged as an employee.

As of the date of this report, the disciplinary process regarding the faculty member is pending.

OIG Case Number 15-0104

The OIG received a complaint that a full-time faculty member assigned to a City College, while teaching clinical classes at a local hospital, was not working all of the hours to which she was assigned. The OIG investigation revealed that during the Fall 2014 term, the faculty member was assigned to teach classes at another City College, including a clinical class at a local hospital.⁸ During the Fall 2014 term, the faculty member only taught the Saturday clinical class from the beginning of the term (August 25, 2014) until September 16, 2014, when she went on a leave of absence.

The OIG investigation revealed that on at least two of the three instances when the Saturday class was scheduled to meet, the faculty member was on duty with and being paid by the hospital at the same time that she was to conduct the scheduled clinical class. The OIG investigation also revealed that on one or more occasions, the faculty member was on duty with and being paid by the hospital at the same time that she was to perform scheduled office hours for her CCC students. The extent of the overlap between the faculty member's office hours and her hospital work hours was difficult to quantify due to the uncertainty of her exact office hour schedule.

The above actions by the faculty member violated Section IV, Paragraphs 7, 11, 12, 42, and 50 of the CCC District-Wide Employee Manual, as well as the outside employment provisions of Section III of the CCC District-Wide Employee Manual.

Moreover, the OIG investigation revealed that during the Fall 2014 term, and since April 2009, the faculty member was a full-time employee of the hospital as well as a full-time faculty member with CCC. As such, the faculty member violated the outside employment provisions of Article VIII of the Agreement between the Board of Trustees of Community College District No. 508 and the Cook County College Teachers Union, Local 1600.

Prior to a scheduled interview with the OIG, the faculty member resigned from her position with CCC. As such and based on the OIG investigation, the OIG recommended that the faculty member be designated ineligible to be re-hired and that her personnel records reflect this designation. Subsequently, the faculty member was designated ineligible to be re-hired.

⁸ It should be noted that the local hospital noted in the summaries for OIG Case Numbers 15-0104 and 15-0106 was the same hospital.

OIG Case Number 15-0089

The OIG received a complaint that a lecturer assigned to a City College, who also taught at various other City Colleges, misrepresented himself as a PhD. The OIG investigation revealed during the Fall 2014 term, the lecturer taught a class at a City College despite not having the required credentials, that is he lacked a bachelor's degree - a credential which was required to teach that class under the CCC Credential Guidelines. Moreover, the OIG investigation revealed that during the hiring process at one of the City Colleges at which the lecturer taught, the lecturer misrepresented that he obtained a Doctor of Science degree, when in fact his Doctor of Science degree was from Belford University, a known unaccredited diploma mill. Likewise, the lecturer misrepresented himself as "Dr." on his syllabus for his class at a City College. The lecturer's actions violated Section IV, Paragraphs 9 and 15 of the CCC District-Wide Employee Manual.

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

The lecturer was terminated, and he was designated ineligible to be re-hired.

OIG Case Number 15-0010

The OIG received a complaint that a current full-time faculty member approved his own special assignments when he was the human resources administrator at a City College. The OIG investigation revealed that the full-time faculty member was overpaid between \$2,475.00 and \$2,915.00 for teaching a module of a program at the City College, contrary to the terms of a grant renewal agreement. The OIG investigation revealed that during the Summer 2013 term, the faculty member taught one module and one clinical, and he co-taught a second module. The faculty member was paid \$3,850.00 for co-teaching the second module during the cohort, which was \$2,475.00 more than the approximate amount of \$1,375.00 that the program's grant renewal agreement provided should be paid to someone who teaches a second module during a cohort. Moreover, the faculty member may have received an overpayment of as much as \$2,915.00 for co-teaching the second module during the Summer 2013 term, based on an analysis of the hours of work for which the faculty member was paid for co-teaching this module which revealed that the faculty member's payment for co-teaching this module was based on 53 hours of work that he never did or for which he was already paid via his payment for teaching the other module that he taught during the cohort.

The OIG investigation further revealed that while acting as the City College's human resources administrator, the faculty member signed off on his own Lectureship Assignment forms for his lectureship duties in numerous cohorts for the program. By doing so, the faculty member approved payments to himself.

Included within these Lectureship Assignment forms that the faculty member approved was the Lectureship Assignment form that resulted in him being paid at least \$2,475.00 more than he should have received for co-teaching a second module during the Summer 2013 term. In reviewing and approving the Lectureship Assignment form that caused him to be overpaid, the faculty member was incompetent in his duties as a human resources administrator, in violation of Section IV(39) of the CCC District-Wide Employee Manual. Likewise, by approving his own lectureship assignments, the faculty member participated in the making of decisions in which he had a special interest, in violation of the CCC Ethics Policy, specifically Section 5.2.10(1) of the Board Policies and Procedures for Management & Government, which, in turn, is a violation of Section IV(44) of the CCC District Wide-Employee Manual.

Based on this investigation, the OIG recommended that CCC takes appropriate disciplinary action against the faculty member. The OIG further recommended that CCC uses all legal and fiscally responsible remedies to recoup between \$2,475.00 and \$2,915.00 from the faculty member.

In a letter to the vice chancellor of finance, the Chancellor, in pertinent part, responded to the OIG's recommendations as follows:

Inasmuch as the language in the grant renewal agreement is somewhat confusing regarding the rate of pay, and I believe that sustaining a disciplinary charge would be difficult, I do not believe that we should pursue discipline in this matter. I do believe, however, that we should attempt to recoup the overpayment from (the faculty member), and I am directing you to take whatever steps are necessary to accomplish that.

OIG Case Number 15-0100

The OIG received a complaint that on a specific day, a college lab assistant I assigned to a City College was observed viewing a "pornographic video" on his CCC-issued desktop computer. The OIG investigation revealed that on various occasions during a one-week period, as well as on various other unspecified occasions, the college lab assistant utilized his CCC-issued desktop computer to retrieve sexually explicit materials. The college lab assistant's use of his CCC-issued desktop computer to access sexually explicit images violated the Policies and Guidelines Governing the Use of Computing and Technology Resources of the City Colleges of Chicago, which in turn is a violation of Section III of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the college lab assistant be terminated, 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 college lab assistant, and he was designated ineligible to be re-hired.

OIG Case Number 15-0108

The OIG received a complaint that a CCC-owned laptop computer, which was assigned to the Disability Access Center of a City College, was found to be missing since the latter part of November 2014. The OIG investigation revealed that in the latter part of November 2014, a part-time note taker removed the CCC-owned laptop computer from the City College without authority and failed to return the laptop computer. The OIG investigation further revealed that the note taker did not sign out the laptop, and the note taker denied knowing of the whereabouts of the laptop when asked by the director of the Disability Access Center. Numerous electronic pings to the laptop revealed that the laptop was being used at a local university during the period of November 21, 2014 through January 17, 2015.

The OIG investigation further revealed that the note taker is a student at the university. Moreover, CCC PeopleSoft system records reflect the note taker's address as the address of a residence hall at the university.

The laptop was ultimately recovered by the OIG, after the note taker brought the laptop to the university's information technology department and requested that they examine the laptop because it was not working. The university's information technology department was aware that the OIG was investigating the disappearance of the laptop. Moreover, the CCC asset tag assigned to the missing laptop was still on the laptop.

Following an interview with the OIG during which the note taker admitted taking and not returning the laptop computer, the note taker was arrested by the Chicago Police Department. The note taker was charged with the criminal offense of theft. Subsequently, the note taker appeared in the Circuit Court of Cook County. After the note taker paid \$800.00 in restitution to CCC, the charges against the note taker were dismissed.

The actions of the note taker violated Section IV, Paragraphs 15, 19, 44, and 50 of the CCC District-Wide Employee Manual as well as Article 5.2.7 of the CCC Ethics Policy.

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

The note taker was terminated, and she was designated as ineligible to be re-hired.

OIG Case Number 13-0097

During a review of sabbatical leaves taken by CCC employees to determine whether various aspects of the leaves met the sabbatical leave requirements, the OIG determined that a full-time faculty member assigned to a City College failed to comply with the sabbatical leave requirements as outlined in the Agreement between the Board of Trustees of Community College District No. 508, County of Cook and State of Illinois and the Cook County College Teachers Union, Local 1600 AFT, AFL-CIO, Chicago, Illinois (Faculty and Training Specialists) covering July 16, 2008 through July 15, 2013, which was in effect at the time that the full-time faculty member took his sabbatical leave during the Spring 2011 semester. Specifically, at the conclusion of his Spring 2011 semester sabbatical leave as well as after he was granted a two-month extension after the conclusion of that sabbatical leave, the full-time faculty member failed to complete his dissertation, and he failed to complete his PhD education at a local university as he indicated he would in his Application for Sabbatical Leave. As of the end of the Fall 2014 semester, the full-time faculty member had not completed his dissertation or his PhD education.

Likewise, pursuant to Article IX(A)(1)(e) of the aforementioned agreement as well as Part III(A) of the Sabbatical Application Form, due to his failure to meet the terms and conditions of his Spring 2011 semester sabbatical leave, the full-time faculty member should not have been reinstated to his position with CCC at the conclusion of his Spring 2011 semester sabbatical leave.

The OIG further determined that during the course of his Spring 2011 sabbatical leave, CCC paid the full-time faculty member a total of \$32,117.50 in salary, and the full-time faculty member received and maintained the aforementioned salary amount despite the fact that he did not meet the terms and conditions of his Spring 2011 semester sabbatical leave.

Based on the OIG investigation and pursuant to Article IX(A)(1)(g) of the Agreement between the Board of Trustees of Community College District No. 508, County of Cook and State of Illinois and the Cook County College Teachers Union, Local 1600 AFT, AFL-CIO, Chicago, Illinois (Faculty and Training Specialists) covering July 16, 2008 through July 15, 2013, the OIG recommended that CCC uses all legal and fiscally responsible remedies to recoup \$32,117.50 from the full-time faculty member due to the fact that he did not meet the terms and conditions of his Spring 2011 semester sabbatical leave.

In response to the OIG's recommendation, the Chancellor wrote the following:

Thank you for your report dated February 6, 2015 relating to (the full-time faculty member). I asked the General Counsel to review this matter and, based on my discussion with him, have directed the following:

As you note, it appears that (the full-time faculty member) never accomplished the objectives which served as the basis for his sabbatical in spring 2011. He was nevertheless returned to his position as a full-time faculty member. In the opinion of the General Counsel, it is too late now to require him, under threat of discipline, to return the funds to which he was not entitled. Having said that, I directed Academic Affairs and Human Resources to approach (the full-time faculty member) and elicit from him his plans to perform the work necessary to receive his PhD.

Internal Audit will conduct a review of the process of returning faculty to full-time status following a sabbatical in order to determine whether there are sufficient controls.

At the very least, the fact that faculty members who go on sabbatical remain on (CCC's) payroll contributes to the confusion of how to handle faculty members when they return to full-time status. As a result, I have directed that an additional step be inserted into this process. Going forward, Academic Affairs will be required to notify Payroll when a faculty member returns from sabbatical. If the faculty member has completed the objectives that served as a basis for the sabbatical, then the faculty member can continue to receive full pay as before the sabbatical. If, however, Academic Affairs determines that the faculty member did not complete the objectives that served as a basis for the sabbatical, then notice will be provided to the faculty member that unless a plan for corrective action is presented and implemented, (CCC) will seek a return of funds paid during the sabbatical consistent with Board rules.

OIG Case Number 15-0001

The OIG received a complaint that a full-time faculty member assigned to a City College dismissed her night classes significantly earlier than the classes were scheduled to end. The OIG investigation revealed that on numerous occasions during the Fall 2014 term, the faculty member failed to be present at the City College for all of her scheduled office hours because she arrived after the start time or left before the end time of her scheduled office hours. The OIG investigation revealed that during the Fall 2014 term, the faculty member shorted her office hours on 24 days by a total of more than seven hours. On ten (42%) of these 24 occasions, the faculty member shorted her office hours by more than 20 minutes, and on three (12.5%) of these 24 occasions, the faculty member shorted her office hours by more than 45 minutes. In all, at the faculty member's rate of pay, the value of the shorted office hours exceeded \$700.00. These

actions by the faculty member violated Section IV, Paragraphs 2, 4, 7, 11, 38, and 50 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the faculty member. Following the disciplinary process, the faculty member was issued a one-day suspension.

Additionally, due to a lack of clarity regarding the appropriate number of class hours that the faculty member was required to teach at the City College, the OIG recommended that the Office of Academic Affairs reviews the City College's class schedule to ensure that class hours are calculated consistently with the other City Colleges and consistently with the Agreement between the Board of Trustees of Community College District No. 508 and the Cook County College Teachers Union, Local 1600.

OIG Case Number 15-0107

The OIG received a complaint that an associate dean of a City College publically indicated that exam review materials were distributed to nursing students despite the fact that the review materials were proprietary and were not purchased for student use by either CCC or the students. The OIG investigation revealed that at a directors' meeting, an associate dean represented that among the reasons that her college's nursing students were doing so well was that her students received various aids including the exam review materials. During the course of the investigation, the OIG obtained a flash drive from the associate dean containing the materials that she distributed to her college's nursing students. A review of the materials revealed numerous documents, video files, and mock exams tailored to prepare nursing students for nursing exams, licensure and certification. Included in these materials was a folder titled "Quick Reference Worksheets," which contained 41 documents including one titled "complete_notes." The "complete_notes" document, which is 258 pages long, contained a notice which provides: "All materials used during any seminar are copyrighted and are not for use without the sole permission of (the publisher's representative) in any form or fashion."

In order to minimize the risk of CCC personnel violating copyrights and subjecting CCC to financial liability in the future, the OIG recommended that CCC develops specific copyright policies and procedures, which should include, but not be limited to, the following:

- An official process that CCC employees can follow to receive advice on any copyright-related issues.
- A process to vet the works that are issued on CCC's behalf before the works are published or distributed.
- A process for acquiring, documenting, and maintaining any licenses that are necessary to legitimately use a copyrighted work.

It should be noted that the OIG made these same recommendations in an Investigative Summary submitted on February 27, 2014 regarding potential copyright infringement based on material produced and distributed by another CCC academic department. However, as of the date of the submission of the Investigative Summary discussed herein, CCC had not developed or implemented specific copyright policies and procedures. In that February 27, 2014 Investigative Summary, the OIG made the following point:

In conclusion, as detailed in this Investigative Summary, because of the risk that CCC violated numerous copyrights and could do so in the future, the implementation of specific policies and procedures are necessary to reduce CCC's likelihood of incurring financial liability for copyright violations committed on CCC's behalf.

For the second time in about one year, a CCC employee arguably inappropriately distributed copyrighted material. Clearly, the development and implementation of copyright policies and procedures is needed.

OIG Report Number 15-0147

The OIG received a complaint that a technology integration specialist failed to return a laptop that she borrowed from her previously assigned City College, and she returned an iPad in completely damaged and unusable condition.

The OIG investigation revealed that while the technology integration specialist was assigned at her previous assignment, she lost a CCC laptop computer, probably more than a year earlier as that was the last time that it was connected to a network per the "ping" report, but she had absolutely no explanation as to what happened to the laptop.

The OIG investigation also revealed that the technology integration specialist returned a CCC iPad to the City College in a significantly damaged and unusable condition. The technology integration specialist only returned the iPad after possessing it for more than one year and well after her need to possess it, prepping for a single class in iPad use, passed.

The OIG investigation further revealed that the technology integration specialist returned a CCC laptop computer to the City College that she did not sign out and for which she never received permission to possess. The technology integration specialist had unauthorized possession of this laptop computer for at least six or seven months.

The actions of the technology integration specialist violated Section IV, Paragraphs 19, 34, 37, 39, 44, 47, and 50 of the CCC District-Wide Employee

Manual. The actions of the technology integration specialist also violated Article 5.2.7 of the CCC Ethics Policy.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the technology integration specialist. The OIG also recommended that CCC utilizes all fiscally responsible legal remedies to recoup from the technology integration specialist funds sufficient to replace the lost laptop computer and the significantly damaged and unusable iPad.

As of the date of this report, the disciplinary process regarding the technology integration specialist is pending.

OIG Case Number 15-0177

The OIG received a complaint from a City College that a janitor assigned to the City College stole toilet paper rolls from the college. The OIG investigation revealed that during his Saturday work shift, the janitor removed numerous partially used rolls of toilet paper from the City College and took the toilet paper rolls home. According to both the director of auxiliary services at the City College and the janitor's supervisor, the janitor did not have authorization to take home the partially used rolls of toilet paper. As such, the janitor violated Section IV, Paragraphs 19, 37, 44 and 50 of the CCC District-Wide Employee Manual and Article 5.2.7 of the CCC Ethics Policy. Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the janitor.

Following the disciplinary process, the janitor was suspended for a period of five days.

During the course of the investigation the OIG learned that the general rule at the City College is that toilet paper rolls should be replaced when there is about one-third left. However, removing and discarding toilet paper when the roll is at the one-third level appears to be quite wasteful. According to the chief engineer at the City College, the toilet paper rolls in question are purchased by the case, with 12 9-inch diameter rolls in each case. The chief engineer estimated that the City College uses about 25 cases of toilet paper per month. Per a recent requisition form, the cost to CCC for a case of this toilet paper is \$27.98. The chart to follow documents the funds potentially wasted annually if one-third, one-quarter, one-fifth, or one-tenth of the toilet paper rolls purchased for the City College are routinely discarded:

<u>Price</u>	<u>Amount</u>
\$27.98	1 case
\$699.50	Monthly purchase - 25 cases
<u>\$8,394.00</u>	<u>Annual Purchase – 300 cases</u>
\$2,770.02	33% of annual total purchase
\$2,098.50	25% of annual total purchase
\$1,678.80	20% of annual total purchase
\$839.40	10% of annual total purchase

To minimize such waste in the future, the OIG recommended that the Department of Administrative and Procurement Services develops and implements policies regarding the appropriate time to change partially used rolls of toilet paper in CCC bathrooms and the appropriate use/disposal of toilet paper rolls that are partially used.

OIG Case Number 15-0203

The OIG received a complaint that a security officer assigned to a City College stole a cellular telephone, which was turned in to the security desk after being lost by a CCC employee. The OIG investigation revealed that the security officer was the last person to have possession and/or control over a lost cellular telephone which was turned in by a student. This cellular telephone belonged to a CCC employee who lost the cellular telephone on May 2, 2015. CCC security video footage appeared to show that the security officer took the cellular telephone from the drawer of the security desk and placed it in his backpack prior to leaving for the day on May 4, 2015. Due to the security officer's decision to resign before the OIG was able to interview him, the OIG was not able to question him regarding his actions. However, in an e-mail to his supervisor, the security officer represented that he "left cellphone inadvertently in the U building security desk and forgot to take it to our command office...."

Section IV(34) of the CCC District-Wide Employee Manual provides that it is prohibited conduct to act negligently in the course of employment so as to damage private property. Although the security video seems to indicate that the security office took the cellular telephone and placed it in his backpack, at a minimum, it is clear that at the very least the security officer was negligent in failing to secure the cellular telephone under his control, contrary to Section IV(34) of the CCC District-Wide Employee Manual.

As the security officer resigned from his position with CCC and based on the OIG investigation, the OIG recommended that the security officer be designated ineligible to be re-hired and that his personnel records reflect this designation. The security officer was designated ineligible to be re-hired.

OIG Case Number 14-0229

Based on a complaint received from a student enrolled in a City College program who performed his practicum at a mental health counseling service provider (“service provider”), the OIG initiated an investigation of the service provider. During the course of the investigation, the OIG interviewed several students who performed their practicums at the service provider. These students stated that the service provider engaged in significant unethical behavior, including having the students falsify paperwork regarding therapy sessions that the students did not attend. Due to the fact that an investigation regarding the propriety of the services provided by service provider on behalf of a department of the State of Illinois was beyond the mandate of the OIG as documented in Article 2.7 *et seq.* of the Board Bylaws, the OIG met with and referred the issues raised to the Office of the Inspector General of a State of Illinois department. The OIG was informed that based on the information provided by the OIG, the Office of the Inspector General for the State of Illinois department initiated an investigation regarding the service provider. In a letter dated April 21, 2015, the City College notified the service provider that they were not included on the list of sites available to students for the Spring 2015 term’s practicum based on the “internal investigation resulting from issues that arose with students who were assigned to (the service provider) this past fall.”

The OIG recommended that CCC refrains from reinstating the service provider to the list of sites available to CCC students for practicum experience until the investigation being conducted by the Office of the Inspector General for the State of Illinois department is completed. The service provider is not currently on the list of sites available to CCC students for practicum experience.

OIG Report Number 15-0132

The OIG received a complaint that CCC-owned equipment, valued at more than \$4,000.00, was lost by a technician. The OIG investigation revealed that the technician inadvertently failed to reload a bag containing seven items of video-related equipment onto a CCC vehicle used to travel to remote sites. Upon return to the remote production site, the items were gone. By failing to reload the video-related equipment into the CCC vehicle, the technician was inattentive to his duty, in violation of Section IV(38) of the CCC District-Wide Employee Manual.

There were other problematic issues surrounding the loss of the video-related equipment. These problematic issues included the following:

- The technician failed to notify the Department of Safety and Security for 31 work days and 47 calendar days that the seven items of video-related equipment valued at a total of more than \$4,000 were lost, contrary to

Section III of the CCC District-Wide Employee Manual, which in turn is a violation of Section IV(47) of the CCC District-Wide Employee Manual.

- Two of the seven items of video-related equipment that were lost, with a total value of \$2,600.00, were not included on the CCC non-capital asset inventory list.
- Despite a 2011 recommendation by the OIG and a representation by the department that department personnel were checking out equipment prior to removal of the equipment from the facility and that such equipment was inspected upon return, no such tasks are being routinely performed at the department.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the technician. Additionally, in order to determine the full extent to which the department's control over its assets is problematic, the OIG recommends that a full and complete inventory/audit of the equipment maintained by the department be conducted.

As of the date of this report, the disciplinary process regarding the technician is pending.

OIG Case Number 15-0129

The OIG received a complaint that a business manager assigned to a City College resided outside the City of Chicago in violation of the CCC Residency Policy. The OIG investigation revealed that the business manager resided in Chicago Ridge, Illinois, in violation of Article 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 business manager falsified employment records in that he fraudulently affirmed on a CCC residency certification document that he resided in Chicago, Illinois, when in fact he resided in Chicago Ridge, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the business manager be terminated, that he be designated ineligible to be re-hired, and that his personnel records reflect this designation.

Following the disciplinary process, the business manager was terminated, and he was designated ineligible to be re-hired.

OIG Report Number 15-0054

The OIG received a complaint that a full-time faculty member assigned to a City College resided outside the City of Chicago in violation of the CCC Residency Policy. The OIG investigation revealed that the full-time faculty member resided in Evanston, Illinois, in violation of Article 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 he fraudulently affirmed on CCC residency certification documents that he resided in Chicago, Illinois, when in fact he resided in Evanston, 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, that he 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 faculty member, and he was designated ineligible to be re-hired.

OIG Case Number 14-0113

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 Policy. The OIG investigation revealed that the janitor resides in Burnham, Illinois, in violation of Article 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 she fraudulently affirmed on numerous CCC residency certification documents that she resided in Chicago, Illinois, when in fact she resided in Burnham, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Based on the investigation, 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 report, the disciplinary process regarding the janitor is pending.