

Office of the Inspector General City Colleges of Chicago

Office of the Inspector General Bi-Annual Report July 1, 2013 – December 31, 2013

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

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Inspector General

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

Date: February 10, 2014

RE: OIG *Bi-Annual Report* for the period of July 1, 2013 through December 31, 2013

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. This *Bi-Annual Report* covers the period of July 1, 2013 through December 31, 2013. Pursuant to Section 2.7.5, the *Bi-Annual Report* for the period of July 1st through December 31st is required no later than March 1st each year. This is the seventh *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.

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 January 1, 2013 to June 30, 2013 reporting period, the OIG submitted twenty 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 updates the statuses of the disciplinary actions recommended by the OIG against CCC employees as well as the actions taken by CCC.

Case Number	Subject	Recommended Disciplinary Action	Disciplinary Action Taken
13-0003	Financial Aid Advisor	Appropriate Discipline	Written Reprimand
13-0003	Director	Appropriate Discipline	Resignation
13-0003	Assistant Director	Appropriate Discipline	Written Reprimand
13-0091	Computer Lab Assistant	Termination / DNRH ¹	Termination / DNRH
13-0091	Various Students (12)	Appropriate Discipline	Disciplinary Reprimands / Course Failures
11-0127	Full-Time Faculty	Appropriate Discipline	3 Day Suspension
13-0069	Lecturer	DNRH	DNRH
13-0067	Security Officer	Termination / DNRH	Termination / DNRH
13-0067	Student	Appropriate Discipline	None
13-0150	Janitor Supervisor	Appropriate Discipline	None
13-0150	Janitor	Transfer	Transfer
12-0158	Engineer	Termination / DNRH	Termination / DNRH
12-0144	Janitor	Termination / DNRH	Termination / DNRH
13-0149	Security Officer	Written Reprimand	Written Reprimand
13-0137	Full-Time Faculty	Appropriate Discipline	Written Reprimand and Sensitivity Training
13-0201	Coordinator	Appropriate Discipline	3 Day Suspension
13-0001	College Advisor	Termination / DNRH	Termination / DNRH
13-0077	Lecturer	Termination / DNRH	Termination / DNRH
13-0158	Security Officer	DNRH (employee resigned)	DNRH
13-0047	Full-Time Faculty	Termination / DNRH	Retirement / DNRH
13-0047	Student	Appropriate Discipline	Written Reprimand / Ineligible for Federal Work Study

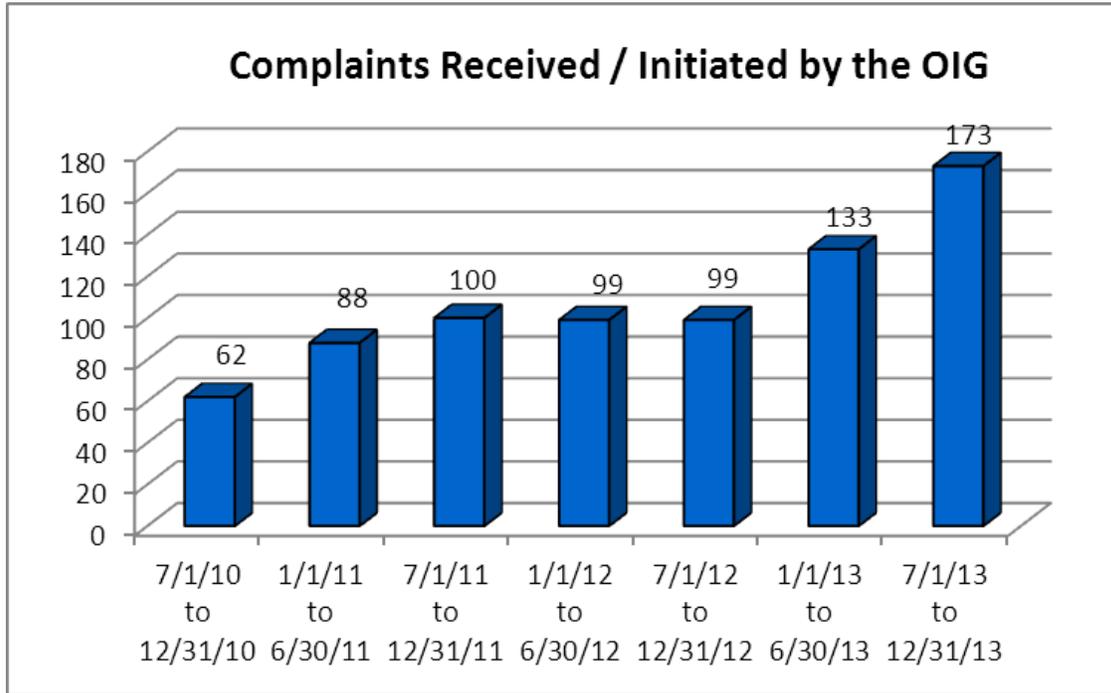
Complaints Received

For the period of July 1, 2013 through December 31, 2013, the OIG received 173 complaints. These 173 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.² This represents the most complaints received by the OIG during any six month reporting period and a 30% increase from the 133 complaints received during the previous reporting period (January 1, 2013 to June 30, 2013). Additionally, the 306 complaints received during calendar year 2013 represent a 54.55% increase from the 198 complaints received during calendar year 2012. For purposes of comparison to the number of complaints received during the period of July 1, 2013 through December 31, 2013, the

¹ "DNRH" means "do not re-hire." In such cases, the employee is designated ineligible to be re-hired, and such designation is documented in the employee's personnel records.

² 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....

following table documents the complaints received by the OIG during previous reporting periods.



The 173 complaints received represent a variety of subject matters. The table below documents the subject matter of the complaints received.

Subject Matter (Allegation)	Number	%
Conduct unbecoming a public employee	2	1.16%
Requesting or receiving a leave of absence on fraudulent grounds	2	1.16%
Test cheating	3	1.73%
Violation of Athletic Governance Policy	3	1.73%
Ethics violation	4	2.31%
Preferential treatment	4	2.31%
Reviews initiated by the OIG	3	1.73%
Use of CCC property for unauthorized purposes	4	2.31%
Discrimination	5	2.89%
Falsification of employment records	5	2.89%
Misappropriation of funds / Theft	5	2.89%
Discourteous treatment	10	5.78%
Sexual or other harassment	10	5.78%
Fraud (including grants / financial aid)	11	6.36%
Violation of other miscellaneous CCC policies	18	10.40%
Residency	18	10.40%
Inattention to duty	26	15.03%
Falsification of attendance records	40	23.12%
Totals	173	100.00%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of June 30, 2013, the OIG had 98 complaints that were pending, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of July 1, 2013 through December 31, 2013, the OIG closed 141 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; the subject of the complaint retired or resigned from CCC employment prior to or during the course of the investigation; the complaint was a duplicate of a complaint previously received; and the subject of the complaint was previously disciplined for the conduct alleged in the complaint. The following chart categorizes the reasons that the OIG closed the 141 complaints during the current reporting period.

Reason Closed	Number
Sustained	18
Not Sustained / No Policy Violation	58
Referred / Deferred	48
Subject Inactive	7
Duplicate Complaint	9
Subject Previously Disciplined for the Conduct Alleged in the Complaint	1
Total	141

Regarding the complaints closed during the period of July 1, 2013 to December 31, 2013, 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.³

All Complaints Closed Between July 1, 2013 and December 31, 2013		
Reason Closed	Number	Average Calendar Days to Close
Sustained	18	270
Not Sustained w/ Recommendation(s)	0	--
Not Sustained / No Policy Violation	58	169
Referred / Deferred	48	1.25
Subject Inactive	7	51
Duplicate Complaint	9	1.1
Subject Previously Disciplined for Same Conduct	1	50
Total	141	

For purposes of comparison, the table below documents the average number of calendar days between the date that complaints were received and the date that complaints were closed for complaints closed during the previous reporting period (January 1, 2013 through June 30, 2013):

³ 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.

All Complaints Closed Between January 1, 2013 and June 30, 2013		
Reason Closed	Number	Average Calendar Days to Close
Sustained	14	198
Not Sustained w/ Recommendation(s)	3	200
Not Sustained / No Policy Violation	50	162
Referred / Deferred	40	1
Subject Inactive	4	150
Duplicate Complaint	4	<1
Subject Previously Disciplined for Same Conduct	0	--
Total	115	

As of December 31, 2013, the OIG had 130 pending complaints. Seventy-four of these 130 pending complaints (57%) were received between July 1, 2013 and December 31, 2013.

OIG Reports Submitted – July 1, 2013 through December 31, 2013

During the reporting period of July 1, 2013 through December 31, 2013, the OIG submitted twenty-two reports.⁴ 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 July 1, 2013 through December 31, 2013. These reports recommended disciplinary or other action regarding twenty-three individual current or former employees, twenty-five current or former students, one prospective employee and one vendor.

OIG Case Numbers 13-0032 and 13-0076

Based on observations made during an unrelated investigation, the OIG initiated a review of the Federal Work Study Time Sheets submitted by CCC students who were also members of the various CCC athletic teams. This review covered the period of the Fall 2010 term through the Fall 2012 term.

The OIG reported on this review via six Investigative Summaries. One of these Investigative Summaries served as a District-Wide Summary, while five Investigative Summaries documented the OIG's specific findings regarding five City Colleges. It should be noted that the OIG found no significant issues regarding the Federal Work Study Time Sheets submitted by student athletes at one City College, and one City College does not have a sports program.

⁴ 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.

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

- 55% of the student athletes who participated in the Federal Work Study program were assigned to work with their City College's Athletic Department and/or for coaches, in violation of Section 8.0 of the CCC Athletic Governance Policy which specifically prohibits such assignments.
- Significant numbers of instances (192) where the dates and times represented on Federal Work Study Time Sheets by student athletes as purportedly worked conflicted with the times of games in which they participated.
- Significant numbers of instances (329) where the dates and times represented on Federal Work Study Time Sheets by student athletes as purportedly worked conflicted with the times of scheduled practices.
- Dozens of instances where the total hours represented on Federal Work Study Time Sheets as purportedly worked on given days were erroneously calculated resulting in the student athletes receiving pay for hours that they did not in fact work.

The OIG review revealed the following:

- There is a culture at CCC that fails to appreciate any need for accurate and complete time and attendance records. Many supervisors and students interviewed attempted to "justify" the conflicts found by claiming that the hours represented were in fact worked even if the times represented were not in fact worked, without being able to provide any proof since the Federal Work Study Time Sheets were the only documentation of days/hours worked. However, being that many of the conflicting Federal Work Study Time Sheets were completed after the dates of the conflicting games/practices, such justifications are no doubt misplaced.
- Most, if not all, of the conflicts or calculation errors could have been identified if the Federal Work Study program supervisors utilized a minimal amount of time to review the Federal Work Study Time Sheets submitted and engaged in minimal oversight regarding hours of work purportedly performed by the student athletes assigned to them.
- The review shows the potential negative messages regarding integrity, work ethic, commitment, and attention to detail that the Federal Work Study program supervisors are providing to the student participants.
- Student athletes represent about 3% of CCC student participation in the Federal Work Study program. The lack of appreciation for the need for accurate time and attendance records illustrates that the risk of even more significant fraud throughout CCC's administration of the Federal Work Study program is great. False documentation of Federal Work Study time and attendance records may risk CCC's future eligibility for participation in the Federal Work Study program should the United States Department of

Education conduct a similar audit and make similar findings. Potentially, millions of dollars of this type of federal financial aid would be at risk.

- The submission of Federal Work Study Time Sheets which document purported work hours which conflict with games and scheduled practices creates, at the very least, the impression that student athletes are being paid to participate in their given sports. Not only does this put CCC in a very bad light publicly, it could lead to investigations and sanctions of CCC sports programs by the National Junior College Athletic Association.

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

- The OIG recommended that the time and attendance of all Federal Work Study program student participants be maintained as part of the *CCC Works* electronic time and attendance system.
- If CCC opts not to maintain the time and attendance of all Federal Work Study program student participants as part of the *CCC Works* electronic time and attendance system, the OIG recommended that students be instructed and trained to write-in their actual start times and their actual end times on Federal Work Study Time Sheets. Likewise, Federal Work Study program supervisors should be instructed and trained to thoroughly review submitted time sheets.
- The OIG recommended that along with class schedules, which are already incorporated into Federal Work Study program student participants' time sheets, game and practice schedules of student athletes should be incorporated into the Federal Work Study students' time and attendance records (whether electronic or not), so that student athletes' supervisors are aware of such schedules and will refrain from scheduling and/or approving work time which conflicts with the student athletes' practice and game times.
- The OIG recommended that prior to a given pay period, athletic coaches and/or athletic directors be required to provide a certified practice and game schedule to the student athlete's Federal Work Study program supervisor to ensure that accurate and up-to-date practice and game dates and times are incorporated into the student athlete's time and attendance records. Additionally, the Federal Work Study supervisors should be instructed to maintain a copy of these schedules for later comparison to the purported work times submitted by Federal Work Study student participants to ensure that no conflicts with game and practice schedules exist.
- The OIG recommended that the Department of Student Financial Services systematically reviews the Federal Work Study program to ensure that no student athletes are assigned to work with Athletic Departments and/or for coaches contrary to Section 8.0 of the CCC Athletic Governance Policy which specifically prohibits such assignments.

- The OIG recommended that CCC takes appropriate disciplinary action against four employees who served as Federal Work Study program supervisors and approved problematic Federal Work Study Time Sheets.
- The OIG recommended that CCC takes no further action against four individuals who served as Federal Work Study program supervisors but who were no longer employed with CCC.
- The OIG recommended that CCC takes appropriate action regarding three student athletes who are currently enrolled in courses with CCC, including but not limited to deeming the students ineligible to participate in the Federal Work Study program immediately and in the future.
- The OIG recommended that CCC takes appropriate action regarding twenty-two student athletes who are no longer enrolled in courses with CCC, including but not limited to deeming the students ineligible to participate in the Federal Work Study program should they enroll in courses with CCC.

The various disciplinary processes regarding the employees and students are pending.

Case Number 14-0057

The OIG received a complaint that a catering manager booked an event for herself and charged herself half the price that CCC charges its customers. The OIG investigation revealed that the catering manager engaged in activities that resulted in a conflict of interest with her present CCC employment in that she priced a menu for a catering event in which she was the client. Also, the catering manager preferentially treated herself in that she waived various fees, applied an employee discount, charged herself for twenty-two guests when she guaranteed thirty guests and food was purchased for at least thirty guests, and charged herself a favorable rate per person. In all, the catering manager paid about 43% (\$546.62 less) of what she should have paid for the event had she paid all appropriate costs and all relevant fees.

The OIG investigation further revealed that a special events chef engaged in activities that resulted in a conflict of interest with her present CCC employment, in that she ordered and prepared food for a catering event in which she was the client. Also, the special events chef preferentially treated herself in that she ordered and prepared food well in excess of the amount necessary to feed the forty guaranteed guests at the catering event in which she was the client. Moreover, the special events chef received preferential treatment from the catering manager discussed above in that the catering manager waived various fees and significantly undercharged the special events chef for the menu served. In all, the special events chef paid about 53% (\$569.53 less) of what she should have paid for the event had she paid all appropriate costs and all relevant fees.

The actions of the catering manager and the special events chef violated Section 5.2.10(1) of the City Colleges of Chicago Ethics Policy and violated the District-Wide Employee Manual, specifically Section IV, Paragraphs 12, 26, 37, 38, 39, 44, and 50.

Based on the investigation, the OIG recommended that both the catering manager and the special events chef be terminated, and both be designated ineligible to be re-hired and that their personnel records reflect this designation.

The OIG also recommended that CCC uses all legal but fiscally responsible remedies to recoup \$546.62 from the catering manager and to recoup \$569.53 from the special events chef.

For the sake of consistency and in order to limit favoritism, the OIG recommended that CCC establish written policies and procedures regarding but not limited to the following:

- a. Employee discounts, including eligibility for, the amount of, and the approval process.
- b. Waivers of any fee, particularly room and linen fees, including eligibility for, the amount of, and the approval process.
- c. The tax rate to be utilized.
- d. All food purchased for an event but unused and/or transferred to another facility.

Following the disciplinary process, the catering manager and the special events chef were terminated, and they were designated ineligible to be re-hired.

OIG Case Number 11-0067

The OIG received a complaint that a full-time faculty member, who also served as a program director, misspent program funds. The OIG investigation revealed that as the program director, the full-time faculty member was responsible for the gross mismanagement of the program. The mismanagement of this program, which operated from the Fall 2007 semester through the Summer 2010 semester, caused waste in the CCC funds expended as well as great waste in revenue that CCC was unable to collect. Specifically, the OIG investigation revealed that due to the failure of the program to properly enroll students in the program, CCC did not receive/collect in excess of \$439,000.00 in tuition revenue from students who clearly participated in the program but for whom CCC has no official record of their participation in the program. Likewise, CCC incurred expenses in exam and certificate fees and clothing costs totaling in excess of \$15,500.00 on behalf of these students. Additionally, the program was mismanaged to the extent that an additional \$6,700.00 in CCC funds were wasted in that the program purchased certificate vouchers, which paid for and allowed students to take a certification exam. However, due to nothing more than

mismanagement, the program allowed 134 of these vouchers to expire without being utilized. At a cost of \$50.00 per voucher, \$6,700.00 in CCC funds were wasted by the program. Moreover, sixty of these vouchers, at a total cost of \$3,000.00, were purchased months after the program ceased to exist. Curiously, twelve vouchers were utilized almost one year after the program ceased. During an interview with the OIG, the program director stated that he believed that these vouchers were utilized by a then employee of his personally-owned company.

Not only did the program director fail to properly manage the program, he also engaged in business activities resulting in conflicts of interest between his position as program director and his personally-owned company. The OIG investigation revealed that the program director caused the program to purchase used, out-of-date books from his company and charged CCC more than the price of new, later edition books. Additionally, he caused the program to pay his company to re-test students who took a certification exam in a summer program, despite the fact that CCC handsomely paid the program director to teach these students, who failed the exam after receiving instruction from the program director in the first place. These conflicts of interest engaged in by the program director violated Section 8(a) of the CCC Ethics Policy, then in effect.

The program also violated various CCC procurement policies in the manner in which it purchased clothing for students in the program. During two fiscal years, 2008 and 2010, the program expended more than \$10,000.00 with a single vendor without Board approval or engaging in a formal competitive bidding process. Likewise, the program made purchases in excess of \$3,000.00 in Fiscal Year 2010 from a vendor without engaging in an “informal” competitive bidding process. In both of these situations, the program failed to purchase from the vendors approved by the Board to supply clothing for students in the program. These activities violated Section(s) 1.02, 1.03 and/or 1.06 of the CCC Operations Manual in effect at the time.

Moreover, the assistant director of the program, with the acquiescence and knowledge of the program director, fraudulently created at least eleven invoices for purchases to be made from a vendor and submitted such invoices to CCC in order that checks could be generated to pay for purchases from the vendor. Clearly, this constituted the offense of forgery.

Based on the investigation, the OIG recommended that the program director be terminated. The OIG further recommended that the program director be designated ineligible to be re-hired and that his personnel records reflect this designation. The OIG also recommended that the former assistant program director, whose position was previously eliminated, be designated ineligible to be re-hired and that her personnel records reflect this designation. The OIG also recommended that the program director’s personally-owned company be debarred from doing future business with CCC.

Prior to a scheduled pre-disciplinary hearing, the program director resigned from his position with CCC, and he was designated ineligible to be re-hired. Disciplinary action regarding the former assistant program director and the vendor is pending.

OIG Case Number 11-0126

The OIG received a complaint that a media specialist assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the media specialist resided in Lincolnwood, 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 media specialist 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 Lincolnwood, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Additionally, the OIG investigation revealed that on various occasions, the media specialist falsified his attendance records in that he represented on his Certificates of Attendance that he was present for work when in fact he was not present for work. Moreover, the media specialist received a full day's pay for each of these days when in fact he did not work a full day. By engaging in such action, the media specialist violated Section IV, Paragraphs 7, 11, 17, and 38 of the CCC District-Wide Employee Manual by falsely representing to a superior the quantity of work performed; falsifying his attendance records; misappropriating CCC funds; and by being inattentive to his duty as a media specialist. The media specialist also failed to correct erroneously submitted Certificates of Attendance no later than the first payroll period in which he worked following the submission of the erroneous certificate, in violation of Section 4.11(c) of the Board Policies and Procedures for Management and Government. Based just on the six occasions that OIG surveillances revealed that the media specialist falsified his attendance records, the OIG determined that the media specialist received in excess of \$847.00 in pay to which he was not entitled.

Effective one day before he was scheduled to be interviewed by the OIG, the media specialist retired from his CCC position. As such, the OIG recommended that the media specialist be designated ineligible to be re-hired and that his personnel records reflect this designation. The OIG further recommended that CCC uses all legal but fiscally responsible means to recoup at least \$847.59 from the media specialist for pay that he received to which he was not entitled.

Subsequently, the media specialist was designated ineligible to be re-hired. CCC also recouped \$847.59 from the employee.

OIG Case Number 13-0126

The OIG received a complaint that on one day, two adult educators assigned to a City College falsified their attendance records in that they represented that they worked five and four hours respectively performing registration duties at an off-campus location when in fact they worked less hours. The OIG investigation revealed that the two adult educators represented that they worked 9:00 a.m. to 2:00 p.m. and 9:00 a.m. to 1:00 p.m., respectively, at an elementary school for adult education registration, when in fact they each worked at least one hour less than they represented. The OIG investigation further revealed that the adult educators routinely started their classes after the scheduled start times of their classes, spent an inordinate amount of time outside of their classrooms doing non class-related activities, and routinely ended their classes before the scheduled end times of their classes. Such activity was observed and documented by a student of one of the adult educators, through OIG surveillance, and by OIG review of the College security video.

The actions of the adult educators violated Section IV, Paragraphs 2, 7, 11, 37, 38, and 50 of the CCC District-Wide Employee Manual, in that on various occasions, the adult educators left their work site without authorization; falsely reported to a superior the quantity of worked performed; falsified their attendance records; wasted CCC funds; were inattentive to their duties as adult educators; and engaged in conduct unbecoming public employees. Additionally, the adult educators failed to correct erroneously submitted Certificates of Attendance no later than the first payroll period in which each worked following the submission of the erroneous certificates, in violation of Section 4.11(c) of the Board Policies and Procedures for Management and Government.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the two adult educators.

Following the disciplinary process, each adult educator received a one day suspension.

Case Number 13-0230

The OIG received a complaint that a security officer assigned to a City College stole food and supplies from a training association that rented the College's facilities. The OIG investigation revealed that the security officer, while on duty at the College, obtained various food items and supplies which were owned by the training association and took these items into his possession for his own personal use without authorization. The security officer's actions violated Section IV, Paragraphs 15, 38, and 50 of the CCC District-Wide Employee Manual.

Additionally, during the course of his interview with the OIG, the security officer, after being advised of his administrative rights, made at least four false

statements regarding his actions on the day in question. The security officer's false statements violated Section IV(8) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the security officer be terminated. The OIG further recommended that the security officer be designated ineligible to be re-hired and that his personnel records reflect this designation. Prior to the disciplinary process, the security officer retired from his position with CCC, and he was designated ineligible to be re-hired.

Case Number 13-0214

The OIG received a complaint that a college clerical assistant I assigned to a City College, who was also a student at the College, provided false information on Free Applications for Federal Student Aid ("FAFSAs"), the application used to determine a student's financial aid award. The OIG investigation revealed that the college clerical assistant provided false answers on her 2011/2012 FAFSA, her 2012/2013 FAFSA, and her 2013/2014 FAFSA, in that on those applications, she indicated that she was single despite the fact that she has been married since August 24, 2010. The false information provided by the college clerical assistant on her 2011/2012 FAFSA and 2012/2013 FAFSA did not affect the amount of financial aid to which she was entitled. However, the false information provided by the college clerical assistant on her 2013/2014 FAFSA would have caused her to receive a higher financial aid award than to which she was entitled. However, she was not eligible for financial aid for the 2013/2014 school year because she graduated in May 2013, and she was appropriately classified as a "course taker." The college clerical assistant's actions violated Sections IV(6) and (15) of the CCC District-Wide Employee Manual as well as the Standards of Conduct included in Part VII of the CCC Student Policy Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the college clerical assistant.

The disciplinary process regarding this employee is currently pending.

Case Number 14-0049

The OIG received a complaint that a part-time security officer assigned to a City College was falsifying his attendance records. During the course of six surveillances, the OIG investigation revealed the following:

- On three days, the security officer falsely misrepresented his start and/or end times on his Certificates of Attendance and his College's Security Daily Time Sheets.
- On four occasions, the security officer failed to perform all of his required parking lot and satellite facility security checks and remained parked in the

College's parking lot for hours at a time. Regarding two of these occasions, the security officer represented on Parking Lot Security Check Sheets that he performed various parking lot and satellite facility checks when in fact he did not perform such security checks.

- On one occasion, the security officer falsely misrepresented on a Certificate of Attendance that he worked eight hours and was paid for eight hours, despite the fact that he only worked seven hours.
- On one occasion, the security officer and a janitor supervisor assigned to the College remained in the security officer's personal vehicle parked in the College's parking lot for at least three hours while on duty and performed no perceptible work-related duties.

The activities engaged in by the security officer violated Section 4.11 of the Board Policies and Procedures for Management and Government as well as Section IV, Paragraphs 7, 11, 38, 39, and 50 of the CCC District-Wide Employee Manual. The OIG recommended that the security officer be terminated, that he be designated ineligible to be re-hired, and that his personnel records reflect such designation.

The activities engaged in by the janitor supervisor violated Section IV, Paragraphs 2, 5, 7, 38, 39 and 50 of the CCC District-Wide Employee Manual. The OIG recommended that CCC takes appropriate disciplinary action against the janitor supervisor.

Prior to the initiation of the disciplinary process, the security officer resigned from his position, and he was subsequently designated ineligible to be re-hired.

The disciplinary process regarding the janitor supervisor is currently pending.

Case Number 13-0138

The OIG received a complaint that an administrator at a City College provided his log-on information to at least five Federal Work Study students so the students could complete tasks while he was away from the office. The OIG investigation revealed that the administrator on various occasions shared his PeopleSoft account password with full-time employees of the administrator's department. The OIG investigation further revealed that the administrator shared his PeopleSoft account access with Federal Work Study students assigned to the department. These actions violated Sections 6.3 and 6.6 of the CCC Responsible Computer Use Policy, Section 5 of the Policies and Guidelines Governing the Use of Computing and Technology Resources, and Section IV (45) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the administrator. The OIG also recommended the following:

- The department in question at the College, in conjunction with the Office of Information Technology, conducts a review of the department's positions to determine the appropriate levels of PeopleSoft access its various positions require. Following this review and pursuant to the CCC PeopleSoft Security Request Procedure, the department should then request any and all appropriate and necessary changes to employees' PeopleSoft access by way of *PeopleSoft Security Request Forms*.
- Should the department determine that Federal Work Study students require PeopleSoft access, the department should request, from the Office of Information Technology, PeopleSoft usernames and the PeopleSoft access levels that the Office of Information Technology established for Federal Work Study students.
- The Office of Information Technology, in conjunction with the associate vice chancellor of Student Financial Services, should routinely review the PeopleSoft access levels that are established for Federal Work Study students.

The disciplinary process regarding this employee is pending.

Case Number 14-0070

The OIG received a complaint that a part-time computer lab technician assigned to a City College comes to work drunk and drinks alcohol during his break. The OIG investigation revealed that on various occasions, including October 16, 2013, the part-time computer lab technician drank an alcoholic beverage while on duty in his car while parked in the College parking lot, in violation of Section IV(23) of the CCC District-Wide Employee Manual. The OIG investigation further revealed that on October 2, 2013 and October 10, 2013, the part-time computer lab technician failed to return to work on time after his thirty minute break, in violation of Section IV(5) of the CCC District-Wide Employee Manual; on various days in October 2013, the part-time computer lab technician falsely misrepresented the quantity of work performed, in violation of Section IV(7) of the CCC District-Wide Employee Manual; and the part-time computer lab technician falsified his attendance records, in that on a Certificate of Attendance submitted for October 2, 2013 that he signed on October 3, 2013, the part-time computer lab technician falsely represented that he worked a six hour day when in fact he did not, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the part-time computer lab technician.

The computer lab technician subsequently resigned, and he was designated ineligible to be re-hired.

Case Number 14-0083

The OIG received a complaint that a college data controller and a part-time college clerical assistant I provided false information on various financial aid forms. The college data controller and the part-time college clerical assistant I were assigned to the same City College. The OIG investigation revealed that on Free Applications for Federal Student Aid (“FAFSAs”) submitted for the 2010/2011, 2011/2012 and 2012/2013 school years, the college data controller and the part-time college clerical assistant individually indicated that they were single, despite the fact that they had been married to each other since September 2009. As a result, for the 2011/2012 school year, the part-time college clerical assistant was awarded more financial aid than he would have received had he accurately indicated that he was married. Also, as a result, for the 2011/2012 and 2012/2013 school years, the college data controller was awarded more financial aid than she would have received had she accurately indicated that she was married. Additionally, on a FAFSA submitted for the 2013/2014 school year, the college data controller indicated that she was married in September 2012 as opposed to September 2009.

The actions of the college data controller and the part-time college clerical assistant violated Section IV, Paragraphs 6 and 15 of the CCC District-Wide Employee Manual; the United States Code (20 U.S.C. § 1097(a)); and the Standards of Conduct included in Part VII of the CCC Student Policy Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the college data controller and the part-time college clerical assistant.

During the disciplinary process, both the college data controller and the part-time college clerical assistant resigned from their positions with CCC, and both employees were designated ineligible to be re-hired.

Case Number 14-0095

Based on a request from the CCC General Counsel, the OIG initiated an investigation to determine whether or not a CCC check was cashed by the intended payee, a current CCC student. The OIG investigation revealed that the intended payee cashed CCC check number 212246 on September 9, 2013. However, the OIG investigation further revealed that the student cashed check number 212246 despite the fact that CCC issued a stop payment order regarding the check which the student initiated when she completed a *Stop Payment Check Request* form on August 27, 2013 claiming that she had not yet received the financial aid reimbursement check. A replacement check, dated September 9, 2013 and post-marked September 10, 2013, was subsequently received by the student but was not cashed by the student. The CCC replacement check, number 212805, was recovered by the OIG.

Based on the investigation, the OIG recommended that CCC uses all legal but fiscally responsible remedies to recoup from the student any costs incurred by CCC as a result of the student cashing CCC check number 212246 after a stop payment order was initiated regarding the check.

Case Number 14-0126

The OIG initiated an investigation regarding whether a candidate for a college storekeeper position at a City College submitted altered (forged) documents to CCC. The OIG investigation revealed that during the criminal history verification stage of the CCC application process, the 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 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.

Based on the investigation, the OIG recommended that the job applicant be designated ineligible to be hired and that Department of Human Resources and Staff Development records reflect this designation to prevent the job applicant from being considered for employment in the future. Additionally, being that the job applicant's submission of altered court documents to CCC may constitute 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.

Case Number 13-0176

As a result of the 2013 annual audit of compliance with the CCC Residency Policy, the OIG reviewed the Annual Certification of Residency form submitted by a director at a City College. This review revealed that the director submitted an Annual Certification of Residency form reflecting a City of Chicago address, but she checked the box on the form that provided the following: "I hereby affirm I AM required to be a resident of Chicago and DO NOT currently live within the boundaries of the City." Subsequently, the OIG initiated an investigation.

The OIG investigation revealed that the director resided in Matteson, 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 director falsified employment records in that she provided a false residential address on her 2013 Annual Certification of Residency form, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

After rescheduling an interview with the OIG, the director resigned from her position with CCC. As such, the OIG recommended that the director be

designated ineligible to be re-hired and that her personnel records reflect this designation. Subsequently, the director was designated ineligible to be re-hired.

OIG Case Number 12-0023

The OIG received a complaint that a full-time faculty member, the same full-time faculty member discussed previously in this Bi-Annual Report under OIG Case Number 11-0067, resided outside the City of Chicago. The OIG investigation revealed that the full-time faculty member initially resided in Homewood, Illinois, and subsequently resided in Country Club Hills, 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 various CCC residency certification documents, he fraudulently affirmed that he resided in Chicago, Illinois, when in fact he did not, 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.

Prior to a scheduled pre-disciplinary hearing, the program director resigned from his position with CCC.

Case Number 13-0196

The OIG received a complaint that a college advisor assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the college advisor resided in Norridge, 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 college advisor falsified employment records, in that on CCC residency certification documents, she fraudulently affirmed that she resided in Chicago, Illinois, when in fact she resided in Norridge, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

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

Subsequently, the college advisor resigned from her position with CCC, and she was designated ineligible to be re-hired.

Case Number 13-0175

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 Burbank, 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.

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

The full-time faculty member was terminated as a result of her contract not being renewed, and she was designated in-eligible to be re-hired.

REPORT

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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

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