

Office of the Inspector General City Colleges of Chicago



Office of the Inspector General Bi-Annual Report January 1, 2020 – June 30, 2020

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

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To: Juan Salgado, Chancellor
Dr. Walter E. Massey, Chair of the Board of Trustees
Elizabeth Swanson, Vice-Chair of the Board of Trustees
Peggy A. Davis, Secretary of the Board of Trustees
Karen Kent, Trustee
Deborah H. Telman, Trustee
Darrell A. Williams, Trustee
James Thomas, Jr., Student Trustee

From: John A. Gasiorowski, Inspector General

Date: August 4, 2020

RE: Office of the Inspector General *Bi-Annual Report* for the period of January 1, 2020 through June 30, 2020

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, 2020 through June 30, 2020. 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 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.

It should be noted that during more than one-half of this reporting period, specifically since March 17, 2020, the OIG worked remotely following City Colleges of Chicago guidance in response to COVID-19. While working remotely, the OIG successfully continued the operations of the OIG. Notably, the OIG issued several Investigative Summaries during this period of working remotely.

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.

New Developments

Certified Inspector General Auditor designation

From March 9, 2020 to March 13, 2020, Deborah Muhammad, an OIG investigator II-auditor, attended the Association of Inspectors General Winter Institute held in Jacksonville, Florida.¹ The Association of Inspectors General is an organization of state, local, and federal inspectors general and their staffs. As a result of attending the week-long training institute, as well as successfully passing a comprehensive examination on the final day, Deborah was awarded the designation of *Certified Inspector General Auditor* by the Association. Deborah joins five other current members of the OIG who previously earned the designations of *Certified Inspector General* or *Certified Inspector General Investigator*.

¹ It should be noted that due to CCC budget restrictions, Deborah Muhammad voluntarily paid for her own travel and accommodations in order to attend the week-long training institute in Jacksonville, Florida. The OIG paid the tuition for the institute.

Updates to Investigations Documented in Previous Bi-Annual Reports

Updates regarding disciplinary recommendations made during the July 1, 2019 to December 31, 2019 reporting period

In the *Bi-Annual Report* submitted for the July 1, 2019 to December 31, 2019 reporting period, the OIG submitted 8 reports documenting investigations, which resulted in sustained findings of misconduct regarding 10 CCC employees. The following table updates the disciplinary actions recommended by the OIG as well as the actions taken by CCC regarding employee misconduct documented in the *Bi-Annual Report* submitted for the July 1, 2019 to December 31, 2019 reporting period.

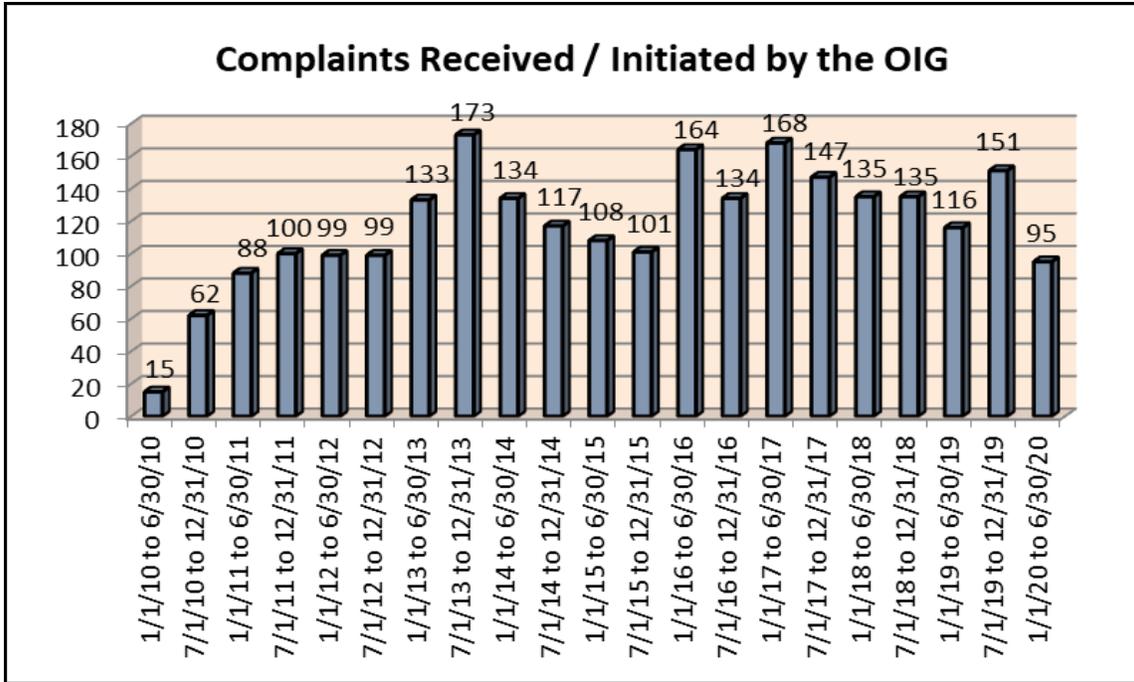
Disciplinary Action Updates from Investigations Reported on in Previous Bi-Annual Report (July 1, 2019 to December 31, 2019)			
Case Number	Title	OIG Recommendation	Final Disciplinary Action Taken
19-0136	President	Termination / DNRH ²	Resignation / DNRH
19-0161	Associate Dean of Adult Education	Appropriate Discipline	5 days suspension
20-0005	Lead Security Officer (part-time)	Termination / DNRH	
20-0005	Security Officer (part-time)	Termination / DNRH	Resignation / DNRH
20-0005	Security Officer (part-time)	Termination / DNRH	
20-0006	Alternative High School Mentor (part-time)	Appropriate Discipline	Position Eliminated
19-0184	Network Support Analyst	Appropriate Discipline	Termination
18-0197	Project Clerk	DNRH (following resignation)	
19-0144	Head Coach (part-time)	Termination / DNRH	
19-0143	College Advisor	Termination / DNRH	Resignation / DNRH

Complaints Received

For the period of January 1, 2020 through June 30, 2020, the OIG received 95 complaints. These 95 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, the following table documents the complaints received by the OIG during the current and previous reporting periods.

² "DNRH" means that the individual was designated "do not re-hire" or ineligible to be re-hired.

³ Under Article 2.7.2 of the Board Bylaws, the powers and duties of the OIG include: c) To investigate and audit the conduct and performance of the District's officers, employees, members of the Board, agents, and contractors, and the District's functions and programs, either in response to a complaint or on the Inspector General's own initiative, in order to detect and prevent waste, fraud, and abuse within the programs and operations of the District....



The 95 complaints received represent a variety of subject matters. The following table documents the subject matters of the complaints received.

Subject Matter of Complaints Received from January 1, 2020 to June 30, 2020		
Subject Matter (Allegation)	Number	Percentage
Board Mandated Audit	1	1.05%
Misappropriation of funds / Theft	1	1.05%
Use of CCC property for unauthorized purposes	1	1.05%
Violation of Drug Free Workplace	1	1.05%
Discourteous Treatment	2	2.11%
Violation of Outside Employment Policy	2	2.11%
Unknown	3	3.16%
Hostile Work Environment	5	5.26%
Discrimination	6	6.32%
Conduct unbecoming a public employee	7	7.37%
Fraud (including grants, financial aid or tuition)	8	8.42%
Violation of CCC Ethics Policy	8	8.42%
Engaging in conduct in violation of the Illinois Compiled Statutes	10	10.53%
Falsification of attendance records	10	10.53%
Inattention to duty	12	12.63%
Residency	18	18.95%
Total	95	100.00%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of December 31, 2019, the OIG had 76 pending complaints, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of January 1, 2020 through June 30, 2020, the OIG closed 98 complaints. The following chart categorizes the reasons that the OIG closed the 98 complaints during the current reporting period.

Complaints Closed Between January 1, 2020 and June 30, 2020		
Reason Closed	Number	Percentage
Sustained	10	10.20%
Board Mandated Audit	1	1.02%
Not Sustained / No Policy Violation	38	38.78%
Referred / Deferred	27	27.55%
Subject Inactive	7	7.14%
Duplicate Complaint	14	14.29%
Complaint included with another active investigation	1	1.02%
Totals	98	100.00%

Regarding the complaints closed during the period of January 1, 2020 to June 30, 2020, the table below documents the average number of calendar days between the date that the complaints were received and the date that the complaints were 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, 2019 through December 31, 2019).⁴

⁴ 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 or the Assistant Inspector General and then 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 Article 2.7.3 of the Board Bylaws.

Average Calendar Days to Close				
Reason Closed	7/1/19 to 12/31/19		1/1/20 to 6/30/20	
	Number	Average Calendar Days to Close	Number	Average Calendar Days to Close
Sustained	8	253	10	443
Review with Recommendations	1	1140	0	--
Completed Board Mandated Audit	0	--	1	152
Not Sustained / No Policy Violation	43	270	38	117
Not Sustained with Recommendations	1	178	0	--
Referred / Deferred	57	1	27	1
Subject Inactive	9	256	7	128
Duplicate Complaint	14	1	14	2
Complaint included with an active investigation	17	1	1	1
Totals	150		98	

As of June 30, 2020, the OIG had 73 pending complaints. Twenty-nine of these 73 pending complaints (39.7%) were received between January 1, 2020 and June 30, 2020, and 29 of these 73 pending complaints (39.7%) were received between July 1, 2019 and December 31, 2019.

OIG Reports Submitted – January 1, 2020 through June 30, 2020

During the reporting period of January 1, 2020 through June 30, 2020, the OIG submitted 11 reports.⁵ These 11 reports included the following: the annual board-mandated audit of the District’s compliance with the CCC Residency Policy and 10 reports documenting sustained findings of waste, fraud and/or misconduct.

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

OIG Case Numbers 19-0120 / 19-0134 / 20-0101

Over the past year or so, the OIG received multiple complaints about a director of student development projects (“director”) assigned to a City College regarding a variety of issues. Investigations were initiated regarding these complaints. The OIG investigations of these complaints revealed the following sustained findings:

- The director engaged in a conflict of interest with present CCC employment, in that she:

⁵ Pursuant to Article 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.

- Participated in the making of the decision to utilize and managed a CCC vendor, while she had a special interest in the vendor, as demonstrated by the fact that she engaged in a romantic relationship with a principal of the vendor, before, during, and after the period of the vendor's CCC contract.
- Participated in the making of the decision to utilize and managed the vendor, while she had a special interest in the vendor, as demonstrated by the fact that she performed various business-related tasks for the vendor, before, during, and after the period of the vendor's CCC contract.
- The director utilized her CCC-issued computer to create and/or edit documents for the vendor and the vendor's principal, before, during and after the period of the vendor's CCC contract.
- The director utilized sick time, when in fact she was not sick, on at least 4.5 days.
- The director committed the criminal offense of forgery, in that she utilized her CCC-issued computer to fraudulently manipulate the contents of her November 23, 2016 CCC pay stub to reflect that she earned more pay than she actually earned, and she subsequently submitted such document as part of her application for a loan.

At a minimum, the director violated Section IV, paragraphs 11, 12 ,13, 15, 19, 30, 44, 45 and 50 of the CCC District-Wide Employee Manual, as well as the CCC Ethics Policy, the Board Policies and Procedures for Management and Government, and the Policies and Guidelines Governing the Use of Computing and Technology Resources.

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

The director was terminated, and she was designated ineligible to be re-hired.

OIG Case Number 20-0077

The OIG received a complaint regarding a dean assigned to a City College. While the OIG investigation of the allegation contained in the complaint did not reveal any CCC policy violation, during the course of the investigation, the OIG did find other acts of misconduct engaged in by the dean and by a student. These findings are discussed as follows:

- OIG Case Number 20-0077 (the dean)

The OIG received information that the dean misrepresented to co-workers that his fiancé died, and the dean inappropriately used bereavement time. The OIG investigation revealed that the dean represented to the City College community that his fiancé died, when in fact, the purported fiancé was not the dean's fiancé and the purported fiancé did not die. The OIG investigation further revealed that on February 6, 2019 and February 8, 2019, the dean inappropriately took bereavement days for the death of his purported fiancé.

At a minimum, the dean's actions violated Section IV, paragraphs 10, 11 and 50 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the dean. The OIG also recommended that sixteen hours of non-sick time be deducted from the dean's benefit day/vacation day balance to replace the bereavement days inappropriately utilized by the dean.

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

- OIG Case Number 20-0077 (the student)

During the course of the investigation of the dean discussed above, the OIG reviewed the athletic files of a City College's men's basketball team, including the student, an applicant to be a member of that 2019-2020 team at the City College. The OIG review revealed that the student submitted a fraudulent CCC Athletic Examination form to the City College, in that the Athletic Examination form represented that the student was examined by a given doctor on a given date, when in fact, the student was never examined by the doctor listed on the form, and the student was never a patient at the medical facility located at the address provided on the form. Additionally, during an interview with the OIG, the student made at least one false statement, specifically that he went to see the doctor reflected in the CCC Athletic Examination form that he submitted, when in

fact he did not. The student's actions violated Section 8.18(d) of the CCC Academic and Student Policy.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the student, pursuant to Sections 8.17 and 8.21 of the CCC Academic and Student Policy. Based on the finding that the student falsified an athletic participation record (specifically, the CCC Athletic Examination form), the OIG recommended that CCC deems the student ineligible for further athletic competition at any time. The OIG further recommended that CCC notifies the National Junior College Athletic Association ("NJCAA") that the student should be deemed ineligible for further competition at any NJCAA member college at any time, pursuant to Article IV, Section 3A.2 of the NJCAA Eligibility Rules.

The student was banned, or deemed ineligible, for participating on any and all athletic teams at his City College and all CCC athletic teams.

OIG Case Number 19-0239

The OIG received information that a security officer was arrested, and he was ultimately charged in the Circuit Court of Will County with eight counts of aggravated criminal sexual abuse, contrary to 720 ILCS 5/11-1.60(b) and 720 ILCS 5/11-1.60(c)(1)(i), which are Class 2 felonies. On January 9, 2020, the security officer pled guilty to two counts of aggravated criminal sexual abuse, contrary to 720 ILCS 5/11-1.60(c)(1)(i). The security officer was sentenced to serve a four-year term of imprisonment.

While as of the date of the submitted Investigative Summary (January 21, 2020), the security officer was listed as an active employee in the CCC PeopleSoft system, CCCWorks time and attendance records reflected that the security officer had not worked for CCC since June 4, 2019. Due to the fact that the security officer remained in custody from the time of his arrest, the OIG was not able to interview him.

During the course of the investigation, the OIG found that between the period of January 26, 2012 and December 18, 2014 - a time during which the security officer was a CCC employee - the security officer's sworn status was suspended by his primary law enforcement agency employer from which he received his active peace officer status; thus, he was no longer qualified to serve as a CCC officer pursuant to Article I of the *Agreement between the Board of Trustees of Community College District No. 508 and the City Colleges Police Officers Association*. Despite being not qualified to serve as a CCC security officer from January 26, 2012 to December 18, 2014, the security officer was paid at the rate for a security officer as opposed to a security assistant. As a result, the security officer received almost \$16,000 in pay to which he was not entitled.

Based on the investigation, the OIG recommended that the security officer be terminated.⁶ The OIG further recommended that the security officer 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 \$15,914.87 from the security officer.

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

OIG Case Number 20-0191

The OIG received information that a temp agency worker assigned to the District Office was convicted of a felony. The OIG investigation revealed that on a CCC Authorization for Release of Information for Non-Employees form, dated January 17, 2020, the temp agency worker represented that he had not been convicted of or plead guilty to a felony. However, the OIG investigation revealed that on June 16, 2009, the temp agency worker entered a plea of guilty to the felony offense of forgery, and he was sentenced in the Circuit Court of Cook County to serve a forty-two-month term of imprisonment.

Effective March 16, 2020, the temp agency worker's temporary employee position with CCC was terminated for "job performance." As such and based on the OIG investigation, the OIG recommended that the temp agency worker be designated ineligible to be hired in the future or otherwise engaged as a temporary or other employee. The OIG further recommended that CCC PeopleSoft records reflect this designation.

The Office of Human Resources informed the OIG that a temp agency worker cannot be designated in the CCC PeopleSoft system as ineligible to be re-hired as he is not an actual employee. The Office of Human Resources was to continue to review for a possible solution.

OIG Case Number 19-0248

The OIG received a complaint alleging, in part, that an associate dean at a City College, supervises her daughter, who is a student and an employee, contrary to the CCC Ethics Policy.⁷ The OIG investigation revealed that the associate dean employed her two daughters as student ambassadors assigned to the City College in the same department in which the associate dean is assigned, in violation of the CCC Ethics Policy, specifically Article 5.2.8(1)(i) of the Board

⁶ The security officer remained in custody after his initial arrest. The security officer did not receive any pay from CCC as of his last day of work, which was a few days prior to the date of his arrest.

⁷ The complaint also alleged that the associate dean's daughter acted unprofessionally while at work.

Policies and Procedures for Management & Government, which, in turn, is a violation of Section IV(44) of the City Colleges of Chicago District-Wide Employee Manual.

The OIG acknowledged that an effort, though unsuccessful, was made to avoid the associate dean being the technical supervisor for her daughters. However, in practice, the associate dean actually employed and oversaw her daughters as student ambassadors. Considering this and based on the investigation, the OIG did not recommend any disciplinary action against the associate dean. Rather, the OIG recommended that the associate dean's two daughters be reassigned to a different department so that the associate dean does not continue to employ her daughters in violation of the CCC Ethics Policy.

According to the President of the City College, the associate dean's two daughters were reassigned.

OIG Case Number 17-0092

The OIG obtained information 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 Country Club Hills, 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 a CCC residency certification document that he resided in Chicago, Illinois, when in fact he resided in Country Club Hills, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

The full-time faculty member resigned from his position with CCC after receiving a letter from the OIG requesting his presence for an interview. As such and based on the investigation, the OIG recommended that the full-time faculty member be designated ineligible to be re-hired and that his personnel records reflect this designation.

The full-time faculty member was designated ineligible to be re-hired.

OIG Case Number 19-0168

The OIG received a complaint that a customer service representative assigned to the District Office resided outside the City of Chicago. The OIG investigation revealed that the customer service representative resided in Riverdale, 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 customer service representative falsified employment records, in that she fraudulently affirmed on a CCC residency certification document that she resided in Chicago, Illinois, when in fact she resided in Riverdale, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

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

At the outset of the disciplinary process, the customer service representative resigned from her position with CCC, and she was designated ineligible to be re-hired.

OIG Case Number 18-0221

The OIG received a complaint that a janitor–group leader (“group leader”) assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the group leader resided in Lombard, 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 group leader 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 Lombard, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

After being advised that the OIG requested his presence for the purpose of an interview regarding his residency, the group leader retired from his position with CCC. As such and based on the OIG investigation, the OIG recommended that the group leader be designated ineligible to be re-hired and that his personnel records reflect this designation.

The group leader was subsequently designated ineligible to be re-hired.

OIG Case Number 18-0151

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

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

Following the disciplinary process, the chief engineer was terminated, and he was designated ineligible to be rehired.

Annual Audit of the District's Compliance with the CCC Residency Policy
(OIG Case Number 20-0167)

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 June 29, 2020, the OIG submitted the 2020 Audit of Compliance with the District's Residency Policy.

On January 27, 2020, full-time employees of CCC were sent an e-mail regarding the need to certify their Chicago residency for 2020 by completing the online *Annual Certification of Residency* form.

On March 16, 2020, the Office of Human Resources provided the OIG with the results of all of the responses received. The great majority (1,896) of the 1,925 (98.5%) full-time employees responded to the Annual Certification Process.

Of the 29 employees who did not respond, the OIG confirmed that 15 were on leaves of absence, and 6 were on sabbatical leaves. Therefore, all but 8 (99.6%) of the full-time employees who were active and working during the 2020 certification of residency process responded. The table below documents the responses received District-Wide, as confirmed by the OIG.

Response	Number	%
No response	8	0.42%
No response due to employee being on a leave of absence	15	0.78%
No response due to employee being on sabbatical	6	0.31%
1. Required to be a resident, with correct address	1850	96.10%
2. Not required to be a resident, with correct address	6	0.31%
3. Required to be a resident, with incorrect address	10	0.52%
4. Not required to be a resident, with incorrect address	1	0.05%
5. Required to be a resident, but does not currently live within the City of Chicago	29	1.51%
Total	1925	100.00%

As part of the audit of compliance with the District's residency requirement, the OIG analyzed these full-time employee responses. The OIG analysis of these responses revealed the following:

- Regarding the 1860 employees who responded that they were required to be a resident of the City of Chicago (See Responses 1 and 3 in the table above):
 - As of June 25, 2020, the OIG had active investigations regarding 14 of these 1,860 full-time employees who represented that they were required to be a resident of the City of Chicago.

- Regarding the 7 employees who responded that they were not required to be a resident of the City of Chicago (See Responses 2 and 4 in the table above):
 - Six of these 7 employees fell within an exception to the CCC residency requirement.
 - Two of these 6 employees were hired before July 1, 1977.
 - Four of these 6 employees were exempt from the CCC residency requirement due to side letter agreements.
 - The one employee who did not fall within an exception to the CCC residency requirement listed a City of Chicago address as her residential address. An OIG review of public records regarding this employee revealed that the employee appeared to reside in the City of Chicago.

- Regarding the 29 employees who responded that they were required to be residents but did not currently reside within the City of Chicago (See Response 5 in the table above):
 - One of the 29 employees fell within an exception to the CCC residency requirement.
 - Ten of the 29 employees were employed for less than six months or received approved extensions.
 - Eighteen of the 29 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 regarding these 18 employees. This review revealed that all 18 of the employees appeared to reside in the City of Chicago, and they most likely checked the wrong box on the Annual Certification of Residency online form.

- Regarding the 8 employees who failed to respond but were active and working employees:
 - One of these 8 employees had a documented exception to the residency requirement filed with the Office of Human Resources.
 - CCC records indicated a City of Chicago residential address for the remaining 7 employees. The OIG reviewed public records regarding these 7 employees. This review revealed that all 7 of the employees appeared to reside in the City of Chicago. The OIG will follow-up to ensure that the Office of Human Resources and their business partners initiate disciplinary action for the employees' failures to respond.

As result of OIG investigations completed during calendar year 2019 resulting in findings of violations of the CCC Residency Policy, five employees resigned or retired. As reported in this Bi-Annual Report, the OIG sustained four investigations regarding violations of the CCC Residency Policy thus far in calendar year 2020 through June. (See summaries for OIG Case Numbers 17-0092, 19-0168, 18-0221, 18-0151 documented on pages 10 through 12 of this Bi-Annual Report.)