

Office of the Inspector General City Colleges of Chicago

Office of the Inspector General Bi-Annual Report January 1, 2016 – June 30, 2016

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 9, 2016

RE: *OIG Bi-Annual Report* for the period of January 1, 2016 through June 30, 2016

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, 2016 through June 30, 2016. 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 - OIG Case Number 08-0012

On January 21, 2016, based on an investigation in which the OIG and CCC Internal Audit participated, a former director assigned to a City College pled guilty to one count of forgery in the Circuit Court of Cook County. On March 3, 2016, the director was sentenced to serve a two-year term of TASC probation.¹ The director also paid \$20,000 in restitution to CCC. This was in addition to more than \$30,000 previously recovered by CCC. The case was docketed under criminal case number 12 CR 1530501.

In August 2012, the former director was charged with eight counts of forgery, a Class 3 felony, by a Cook County Grand Jury. The investigation revealed that the director’s responsibilities included coordinating a conversational Spanish program for employees of a local hospital taught through CCC. The director directed hospital officials not to mail checks to her at the college but instead to

¹ TASC is Treatment Alternatives for Safe Communities. See 20 ILCS 301/40-5.

hold them for her to personally pick up. The director further directed that the checks be made payable to the City College in care of the director. The investigation revealed that the director cashed two of these checks at a bank and deposited two of these checks into her own personal bank account. These four checks totaled more than \$51,000. The director was terminated effective July 5, 2008.

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

On June 22, 2016, pursuant to an OIG investigation, a former college clerical assistant II assigned to a City College ("Employee D"), and a former college storekeeper also assigned to that City College ("Employee E"), were arrested by the Chicago Police Department. Each was subsequently indicted by a Cook County Grand Jury and charged with multiple counts of theft and a count of official misconduct. The criminal charges, docketed under criminal case number 16CR11203, are currently pending.

As reported in in the Bi-Annual Report for the period of January 1, 2015 to December 31, 2015, during the course of the investigation into numerous textbook thefts at a City College by three CCC employees, the OIG became aware of suspicious activities regarding textbooks by Employee D and Employee E, who were assigned to a different City College.

The OIG investigation 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 of textbooks, which had a total retail value of more than \$66,000.00. 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.

Prior to the date that the OIG submitted its findings regarding the 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 both were designated ineligible to be re-hired, the OIG made no additional recommendations regarding these individuals. In June 2015, the OIG

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

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

In the *Bi-Annual Report* submitted for the July 1, 2015 to December 31, 2015 reporting period, the OIG submitted sixteen reports documenting investigations which resulted in sustained findings of waste, fraud and misconduct, resulting in thirteen recommendations of disciplinary action. 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.

Case Number	Subject	Recommended Action	Action Taken
13-0190	Director	DNRH (following resignation) ²	
14-0021	Training Specialist	DNRH (following resignation)	
14-0176	Engineer	Appropriate Discipline	Written Warning
14-0231	College Personnel Assistant II	Appropriate Discipline	1-day Suspension
15-0159	Full-Time Faculty	Appropriate Discipline	3-day Suspension
15-0187	Adult Education Manager	Termination / DNRH	Resignation / DNRH
15-0199	College Advisor	Termination / DNRH	Resignation / DNRH
15-0206	Lecturer	Appropriate Discipline	Termination
15-0210	Janitor	Appropriate Discipline	Termination / DNRH
16-0026	Security Officer	Termination / DNRH	Resignation / DNRH
16-0028	Security Officer	Appropriate Discipline	Termination
16-0041	Lifeguard	Termination / DNRH	
16-0080	Adult Educator	Appropriate Discipline	Termination

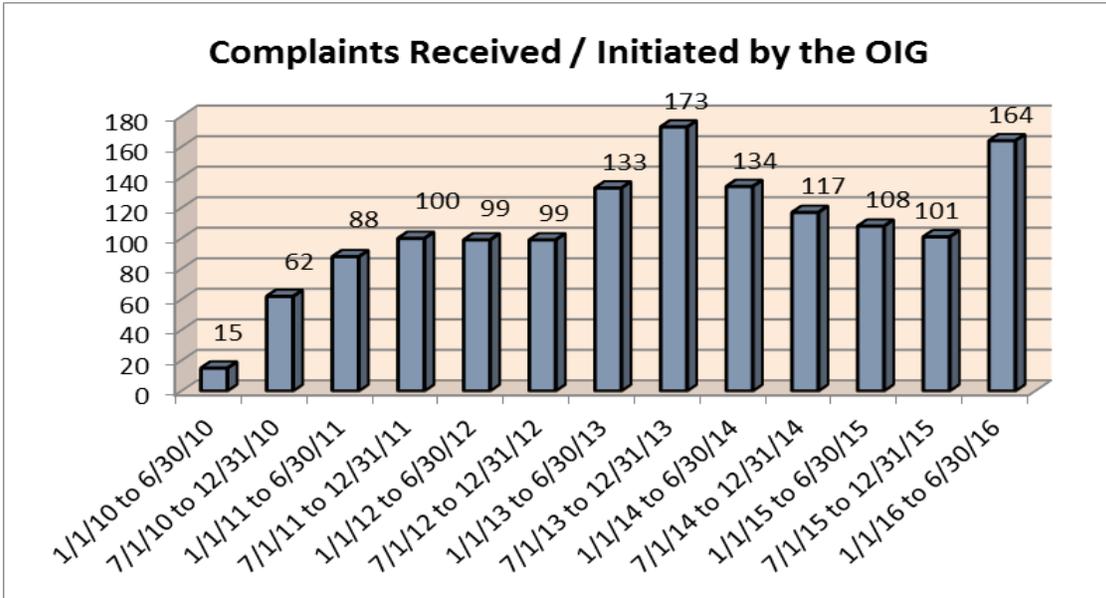
Complaints Received

For the period of January 1, 2016 through June 30, 2016, the OIG received 164 complaints, which represent 62% more complaints received than the 101 complaints received during the previous reporting period. These 164 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

² “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.

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....

received by the OIG during the current reporting period and previous reporting periods.



The 164 complaints received represent a variety of subject matters. The following table documents the subject matters of the complaints received:

Subject Matter (Allegation)	Number	%
Violation of the CCC procurement policies	2	1%
Incompetence in the performance of the position	2	1%
Discourteous treatment	2	1%
OIG initiated reviews	3	2%
Requesting or accepting a leave on fraudulent grounds	3	2%
Violation of Outside Employment Policy / Collective Bargaining Agreement	4	2%
Use of CCC property for unauthorized purposes	5	3%
Retaliation	5	3%
Engaging in conduct in violation of the Illinois Compiled Statutes	5	3%
Misappropriation of funds / Theft	5	3%
Giving Preferential Treatment	5	3%
Violation of CCC Ethics Policy	7	4%
Fraud (including financial aid / tuition)	9	5%
Violation of miscellaneous CCC policies	11	7%
Sexual or other harassment / Discrimination	14	9%
Residency / Annual Residency Compliance Audit	22	13%
Falsification of attendance records	29	18%
Inattention to duty	31	19%
Totals	164	100%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of December 31, 2015, the OIG had 86 complaints that were pending, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of January 1, 2016 through June 30, 2016, the OIG closed 139 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 other reasons. The following table categorizes the reasons that the OIG closed the 139 complaints during the current reporting period.

Complaints Closed Between January 1, 2016 and June 30, 2016		
Reason Closed	Number	%
Sustained	18	13%
No Policy Violation / Not Sustained	43	31%
Referred / Deferred	40	29%
Duplicate Complaint	28	20%
Subject inactive	8	6%
Complaint included with active investigation	1	1%
Residency Compliance Audit	1	1%
Total	139	100%

Regarding the complaints closed during the period of January 1, 2016 to June 30, 2016, the table below documents the average 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, 2015 through December 31, 2015).⁴

Reason Closed	7/1/2015 to 12/31/2015		1/1/16 to 6/30/16	
	Count	Average Days to Close	Count	Average Days to Close
Sustained	16	303	18	197
No Policy Violation / Not Sustained	35	263	43	214
Review with recommendations	1	1062	0	0
Referred / Deferred	31	2	40	1
Other	20	143	38	44
Total	103		139	

As of June 30, 2016, the OIG had 111 pending complaints. 68 of these 111 pending complaints (61%) were received between January 1, 2016 and June 30, 2016, and 18 of these 111 pending complaints (16%) were received between July 1, 2015 and December 31, 2015.

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 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 Article 2.7.3 of the Board Bylaws.

OIG Reports Submitted – January 1, 2016 through June 30, 2016

During the reporting period of January 1, 2016 through June 30, 2016, the OIG submitted twenty reports, known as Investigative Summaries.⁵ These twenty reports included: the 2016 Annual Certification of Residency Audit; sixteen reports documenting sustained findings of waste, fraud and/or misconduct; one report documenting not sustained findings but in which the OIG made a recommendation; and two reports documenting not sustained findings, which due to the public nature in which the allegations were made, the OIG determined that reports were appropriate.

Annual Certification of Residency Audit (OIG Case Number 16-0120)

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 1, 2016, all full-time employees of CCC were sent an e-mail regarding the need to certify their residency for 2016 by completing the online *Annual Certification of Residency* form. The e-mail was sent to 2,280 full-time employees.

On May 10, 2016, the Office of Human Resources provided the OIG with the results of all of the responses received. The great majority (2,255) of the 2,280 (98.9%) full-time employees responded to the Annual Certification Process. Of the twenty-five employees who did not respond, the OIG confirmed that four were on leaves of absence, one was on a sabbatical leave, and nineteen had been terminated. Therefore, all but one of the 2,280 full-time employees who were active and working during the 2016 certification of residency process responded. The one employee who did not respond was due to be terminated at the end of the Spring 2016 term as a result of non-renewal of tenure. The table below documents the responses received District-Wide, as recorded by the Office of Human Resources and confirmed by the OIG.

⁵Pursuant 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.

Response	Number	%
No response	1	0.04%
No response due to employee being on a leave of absence	4	0.18%
No response due to employee being on a sabbatical	1	0.04%
No response due to termination of the employee	19	0.83%
1. Required to be a resident, with correct address	2,177	95.48%
2. Not required to be a resident, with correct address	10	0.44%
3. Required to be a resident, with incorrect address	15	0.66%
4. Not required to be a resident, with incorrect address	1	0.04%
5. Required to be a resident, but does not currently live within the City of Chicago	52	2.28%
Totals	2,280	100%

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, in part, the following:

- Regarding the fifty-two 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):
 - Fourteen of the employees were employed for less than six months or previously received approved extensions.
 - Two of the employees fell within an exception to the residency requirement.
 - One of these employees, whose CCC PeopleSoft records reflected an out-of-state address, subsequently resigned from her position with CCC.
 - Thirty-five of the 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 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 eleven 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):
 - Ten of these employees fall within an exception to the residency requirement.
 - Six of these ten employees were hired before July 1, 1977.
 - Three of these ten employees were exempt from the CCC Residency Requirement due to side letter agreements.
 - One of these ten employees was employed for less than six months.
 - One of these employees responded that he 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 this employee appears to reside within the City of Chicago and no doubt checked the wrong box on the Annual Certification of Residency online form.

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, 2016 through June 30, 2016.

OIG Case Number 16-0022

The OIG received a complaint that on at least two occasions in 2015, a college bursar assistant II assigned to a City College was short in the funds that she collected in a given day. The OIG investigation revealed that in 2014 and 2015, the college bursar assistant failed to process at least \$2,980.00 and failed to deposit at least \$3,125.00 in funds that she received as a result of transactions that she completed on behalf of the City College in her capacity as a college bursar assistant. The funds in question included, but were not limited to, student exam fees and student transcript request fees. At a minimum, the college bursar assistant's actions violated Section IV, Paragraphs 15, 17, 48 and 50 of the CCC District-Wide Employee Manual.

Two days after the OIG sought to interview the college bursar assistant, the college bursar assistant resigned from her position with CCC. As such and based on the investigation, the OIG recommended that the college bursar assistant be designated ineligible to be re-hired and that her personnel records reflect this designation. The OIG also recommended that CCC uses all legal and fiscally responsible remedies to recoup \$3,125.00 from the college bursar assistant.

The college bursar assistant was subsequently designated ineligible to be re-hired.

The OIG determined that the antiquated process of attaching a printed receipt to students' exam retake forms as proof of payment of the exam fees allowed the college bursar assistant to perpetrate her fraud. It appeared that this process was in place due to the fact that unlike tuition payments - which are recorded in the PeopleSoft system in the Post Student Payments (student account) module - student exam fees are recorded in the PeopleSoft system in the Collect Department Receipts module. The significance of this is that only the Business Office has access to the Collect Department Receipts module, and the Testing Center does not. Thus, without attaching the printed receipts to the students' exam retake forms, the Testing Center had no way to verify that the student paid

exam retake fees at the Business Office prior to taking an exam. Moreover, since neither the Business Office nor the program in question subsequently reconciled the fees collected and processed in the Collect Department Receipts module to the services provided, the college bursar assistant was able to provide students with un-posted printed receipts, and no one was the wiser.

In order to mitigate the risk that a fraud similar to the college bursar assistant's fraud is committed in the future, the OIG recommended the following:

1. The OIG recommended that each college's Business Office and the relevant college department be required to routinely reconcile the accounts of the PeopleSoft system Collect Department Receipts module to the exams taken, transcripts provided, id cards purchased, etc.; or
2. The OIG recommended that all student fees paid/collected, including but not limited to (the Program) exam retake fees, other exam fees such as the College Level Examination Program (CLEP) exam and the American Council on Teaching Foreign Languages (ACFL) exam fees, transcript fees, and id card replacement fees, be documented in the student account module of the PeopleSoft system. Thus, the Testing Center and any other department requiring a receipt from a student would be able to electronically verify in the PeopleSoft system the student's payment of the requisite fee prior to providing the requested service.

Moreover, due to the potential criminal nature of the college bursar assistant's actions, 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 15-0196

The OIG received a complaint alleging that on May 1, 2015, various individuals assigned to a department of a City College left for lunch at 1:30 p.m. and did not return until after 3:00 p.m. It was further alleged that this was an "ongoing thing for these employees."

The OIG investigation revealed that on Friday, May 1, 2015, nine employees of the department left the college for lunch between 1:19 p.m. and 1:32 p.m. and returned to the college between 3:21 p.m. and 3:25 p.m. Moreover, despite the fact that seven of these employees were non-exempt employees, who were required to swipe out for and swipe in from lunch, and they were at lunch from about 1:20 p.m. to 3:25 p.m. on May 1, 2015, the CCCWorks time and attendance records for these employees reflected that they were at lunch from about 12:00 p.m. to 1:00 p.m. on that day. Such CCCWorks entries are problematic for two reasons: first, the entries do not accurately reflect the time

frame that the employees were on their lunch breaks; and second, the entries do not accurately reflect the amount of time that the employees spent at lunch on May 1, 2015.

Subsequently, the OIG investigation conducted surveillances, reviewed CCC security video, reviewed turnstile records, reviewed time and attendance records, and interviewed department employees to determine whether such conduct was a recurring activity as alleged in the complaint.

The OIG investigation revealed at least forty-nine instances of problematic entries in the CCCWorks time and attendance system by department employees regarding their lunch periods on Fridays between April 17, 2015 and October 16, 2015. The CCCWorks entries were problematic for two reasons: first, the entries did not accurately reflect the time frame that the employees were on their lunch breaks; and second, the entries did not accurately reflect the amount of time that the employees spent at lunch. For 76% (37 of 49) of these problematic entries, the department director, who was also the supervisor of these employees, approved edits that these employees submitted to their time and attendance records to reflect inaccurate lunch periods when she should have known the employees' accurate lunch times due to the fact that she was present with the employees during the lunch breaks and/or was present with the employees when they left for and/or returned from the lunch breaks.

The OIG investigation revealed a number of instances when the amount of time that the non-exempt employees spent for their lunch breaks significantly exceeded one hour, which resulted in the employees not performing full seven-hour work days. Several of these days were described as "special occasions" by the department director in that they celebrated an employee's last day, etc. While such special occasions may be objectively viewed as a legitimate way to honor employees and maintain good office morale, false edits in the CCCWorks time and attendance system should not have been approved by the department director, and false entries by department employees should not be condoned. Moreover, such "special occasion" activities can be conducted consistent with CCC policies by limiting the celebrations to one hour, by ensuring that full seven-hour work days are nonetheless completed if the celebrations last for more than one hour, by ensuring that CCCWorks entries for a "special occasion" day are nonetheless accurate, or by holding such celebrations after the work day.

On one of the days which a surveillance was conducted by the OIG, five of the employees went to a local restaurant/tavern. The OIG surveillance revealed that they were away from the college from about 1:22 p.m. to 2:41 p.m. on August 28, 2015. However, their CCCWorks entries reflected that they were at lunch from about 12:00 p.m. to 1:00 p.m. on that day. While these employees were at the local restaurant/tavern, each drank an alcoholic beverage. Section IV(23) of the CCC District-Wide Employee Manual provides that it is prohibited conduct to drink alcoholic beverages during "working hours." Based on the fact that the

employees represented that they were at work during the time frame that they were at the restaurant/tavern, it could be reasonably found that they drank alcoholic beverages during working hours, in violation of Section IV(23) of the CCC District-Wide Employee Manual. However, it was clear that the employees were “at lunch” while they drank alcoholic beverages. Due to the fact that “working hours” are not specifically defined in the CCC District-Wide Employee Manual, it is not clear whether actual lunch or break times are “working hours.” Thus, it is unclear whether an employee who drinks alcoholic beverages, off CCC property, is acting inconsistent with CCC policy when he/she does so during breaks or lunch periods. As such, the OIG recommended that Section IV(23) of the CCC District-Wide Employee Manual be amended to specifically reflect whether breaks and lunch periods are included in the definition of “working hours” in the context of this provision.

The actions of the employees violated Section IV, Paragraphs 5, 11, 37, and 50 of the CCC District-Wide Employee Manual, as well as Article 4.11 of the Board Policies and Procedures for Management and Government.

Moreover, during interviews with the OIG, the five employees who visited the restaurant/tavern each made at least one false statement during their interviews with the OIG, in violation of Section IV(8) of the CCC District-Wide Employee Manual.

Based on the investigation, which is detailed in the attached Investigative Summary, the OIG recommended that CCC takes appropriate disciplinary action against the department director, the assistant director and eight other department employees.

Following the disciplinary process, the director was demoted and transferred; the five employees who visited the restaurant/tavern, including the assistant director, were terminated and designated ineligible to be re-hired; and four employees were suspended for one day each.

OIG Case Number 16-0115

The OIG received a complaint that an assistant director assigned to a City College, routinely left his work site at about 7:30 p.m. when he was assigned to work until 11:00 p.m. During the course of the investigation, the OIG conducted surveillance and reviewed the assistant director’s actions via CCC security video over a three-month period. This review revealed that on average, the assistant director was present for work 5.37 hours per day over the three-month period. The OIG investigation also revealed the following:

- On at least forty-one occasions, the assistant director departed from his work site prior to the end of his scheduled end time, in violation of Section IV(2) of the CCC District-Wide Employee Manual.

- On at least twenty-three occasions, the assistant director arrived after his scheduled start time, in violation of Section IV(4) of the CCC District-Wide Employee Manual.
- The assistant director routinely represented that he worked a full day when in fact he did not, in violation of Section IV(7) of the CCC District-Wide Employee Manual.
- On thirteen occasions, the assistant director failed to correct his entries in the CCCWorks time and attendance system reflecting that he worked a full day despite the fact that he worked less than four hours, in violation of Section IV(11) of the CCC District-Wide Employee Manual.
- The assistant director was inattentive to his duty, in that he routinely failed to remain at his work site to perform his duties, in violation of Section IV(38) of the CCC District-Wide Employee Manual.
- The assistant director failed to comply with the CCC Outside Employment policy, in that he engaged in outside employment with a public safety agency which interfered with his CCC employment, contrary to Section III of the CCC District-Wide Employee Manual, which in turn violated Section IV(42) of the CCC District-Wide Employee Manual.
- On thirteen occasions, the assistant director failed to correct his entries in the CCCWorks time and attendance system reflecting that he worked a full day despite the fact that he worked less than four hours, in violation of Article 4.11(c) of the Board Policies and Procedures for Management and Government.

Additionally, during an interview with the OIG, the director stated that lately he noticed that the assistant director was reporting for work later than his normal 3:00 p.m. starting time. The director stated that he believed that this was due to the assistant director working a large amount of hours between his three jobs. It should be noted that two of those jobs were non-CCC jobs.

The OIG investigation revealed that the assistant director was reporting to work after his 3:00 p.m. starting time over 38% of the days on which he worked. Additionally, the OIG investigation revealed that the assistant director left work prior to 8:00 p.m. on 42% of the occasions that he began his work day after 2:00 p.m., he left work prior to 9:00 p.m. on 84% of the occasions that he began his work day after 2:00 p.m., and he left work prior to 10:00 p.m. on 95% of the occasions that he began his work day after 2:00 p.m., despite the fact that he no doubt should have been at the City College until 11:00 p.m. Moreover, the OIG investigation revealed that on average, the assistant director worked less than five and one-half hours a day.

Despite the assistant director's lack of conformity to an expected work schedule of a full-time assistant director, the director neither challenged the assistant director regarding his work hours nor the assistant director's entries in the CCCWorks System. The OIG found that the director was inattentive to his duty in

his supervision of the assistant director, in violation of Section IV(38) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the assistant director be terminated and that he be designated ineligible to be re-hired. The OIG also recommended that CCC takes appropriate disciplinary action against the director. Additionally, due to the fact that on at least thirteen days, the assistant director worked less than four hours, the OIG recommended that the assistant director's time and attendance records be adjusted to reflect the use of .5 benefit days, other than sick time, on each of the thirteen days.

The assistant director subsequently resigned from his CCC position, and he was designated ineligible to be re-hired.

While no disciplinary action was taken against the director, the OIG was informed that the director was to be re-trained on what inconsistencies to look for when approving time sheets.

OIG Case Number 16-0141

During the course of an unrelated investigation, which was previously summarized in this Bi-Annual Report under OIG Case Number 16-0115, the OIG observed a part-time security assistant at a City College who appeared to be nodding off while on duty. At various times during the course of a few surveillances, the OIG observed the security assistant slumped down in his security vehicle with his head down and his eyes closed. During an interview with the OIG, the security assistant stated that sometimes he caught himself nodding off while he was sitting in his security vehicle at work. The security assistant stated that this behavior (nodding off) did not happen all the time but maybe a few times. The security assistant stated that when he did nod off, it was only "for a couple minutes."

The security assistant violated Section IV, Paragraphs 38, 39, and 50 of the CCC District-Wide Employee Manual.

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

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

OIG Case Numbers 16-0074 and 16-0116

The OIG received two complaints regarding a janitor assigned to a City College. One of the OIG investigations revealed that during a Step 3 grievance hearing - held regarding whether there was just cause for the janitor's receipt of a five-day

suspension for his unauthorized possession and removal from the City College of numerous rolls of CCC toilet paper⁶ – the janitor presented a forged letter of recommendation, purportedly written and signed by the City College’s vice president of academic and student affairs. The OIG investigation further revealed that at this same hearing, the janitor also presented a letter of recommendation that was written and signed by a now former dean of instruction on a form to appear as if she made attestations that she had not made. Such actions violated Section IV(6) of the CCC District-Wide Employee Manual. Such actions also constituted forgery, contrary to 720 ILCS 5/17-3, which in turn violated Section IV(15) of the CCC District-Wide Employee Manual. Additionally, during an interview with the OIG, the janitor made at least one false statement. Such action violated Section IV(8) of the CCC District-Wide Employee Manual.

The second OIG investigation revealed that in January 2016, the janitor placed two letters concerning his personal matters into the City College mailroom’s outgoing mail without postage in an attempt to have City College funds used to pay the postage for these letters. One of these letters, a certified letter, was issued postage via a postage meter before it was determined that it was personal mail and was held back from being sent. During an interview with the OIG, the janitor provided the OIG with \$6.73 to cover the postage. By placing two personal letters in the City College’s mailroom without postage in an attempt to have City College funds cover the postage for these letters, the janitor twice violated Section VII and Section IV(19) of the CCC District-Wide Employee Manual.

Based on the investigations, which are detailed in the attached Investigative Summary, the OIG recommended that the janitor be terminated. The OIG further recommended that the janitor be designated ineligible to be re-hired and that his personnel records reflect this designation.

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

OIG Case Number 14-0269

The OIG received a complaint that a program at a City College inappropriately collected payments from the attendees of program-sponsored continuing education classes and failed to remit the payments to the City College’s Business Office. The OIG investigation reviewed the program-sponsored continuing education seminars held during 2013, 2014 and 2015. These continuing education seminars are attended by practitioners in order to earn required continuing education units to maintain licensure.

⁶ The OIG investigation of this incident was documented in the OIG Bi-Annual Report for the period of January 1, 2015 to June 30, 2015 under OIG Case Number 15-0177.

The OIG investigation revealed the following:

- Regarding program-sponsored continuing education seminars held in 2013, the program failed to collect fees from some of the attendees and/or direct attendees to make fee payments to the City College's Business Office. As few as four of the ten (40%) individuals documented in the CCC PeopleSoft system as enrolled in any of the four spring 2013 program-sponsored continuing education seminars paid their seminar fees.
- Regarding program-sponsored continuing education seminars held in 2013, the program failed to register/enroll a majority of the attendees. While ten individuals were documented as registered/enrolled, fee payments were made on behalf of at least twenty-nine individuals or entities.
- Regarding program-sponsored continuing education seminars held in 2014, the program failed to collect fees from the attendees and/or direct attendees to make fee payments to the City College's Business Office. Based on the 2013 fees and the proposed fees for 2014, a total of between \$1,440.00 and \$2,880.00 should have been collected from the twenty-four individuals who were enrolled.
- Regarding program-sponsored continuing education seminars held in 2015, the program failed to register any of the attendees.
- Regarding program-sponsored continuing education seminars held in 2013, 2014, and 2015, the program failed to maintain adequate records of course materials, the continuing education units awarded, and attendance.
- The various failures regarding the administration of the program-sponsored continuing education seminars were also contrary to the Illinois Administrative Code due to the failure to verify attendance and maintain attendance records and course materials for five years.

Based on all of the above problematic issues with the administration of the program-sponsored continuing education seminars held in 2013, 2014, and 2015, the OIG found that the program director, a full-time faculty member, was inattentive to her duty, in violation of Section IV(38) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the program director. Following the disciplinary process, no action was taken against the program director.

The OIG further recommended that the Office of Academic Governance, Compliance and Educational Quality reviews the administration of the continuing

education seminars sponsored by the program in order to put the appropriate pre-enrollment/registration and record maintenance procedures in place and to determine the appropriate fee to be charged to attendees of future seminars.

OIG Case Number 15-0145

The OIG received a complaint of a theft of two skids of lighting fixtures from the dock area of a City College. The OIG investigation revealed that CCC opened a purchase order in the amount of \$24,440.00 for the lighting fixtures and their installation. The lighting fixtures were to be installed in the City College's parking lot by a CCC contractor. The lighting fixtures were stolen by an unidentified individual ("the thief") driving a non-descript box truck. The OIG was unable to determine the identity of the thief. None of the security cameras were able to provide a clear view of any markings on or the license plate of the thief's truck. An OIG inquiry of the City of Chicago revealed that the Chicago Police Department had no surveillance cameras in the immediate area which would aid the OIG investigation.

The OIG investigation revealed that a college senior storekeeper assigned to the City College was responsible for supervising the shipping and receiving of goods as well as inventory management at the City College. Most significantly, security video revealed that the college senior storekeeper allowed the thief into the dock area of the City College, and the college senior storekeeper helped the thief remove the two skids of lighting fixtures from the dock and load the lighting fixtures into the thief's truck.

In briefest summary, during an interview with the OIG, the college senior storekeeper stated, in pertinent part, that despite having never seen the thief before, he opened the garage door and let the thief enter the loading dock. The college senior storekeeper stated that he never asked the thief for any proof of identification or any paperwork authorizing him to pick up the lights. The college senior storekeeper stated that he could not recall the thief's name, and he could not recall if he asked for the thief's name. The college senior storekeeper stated that he assumed that the thief worked for the CCC contractor because the thief knew exactly what items and how many items to ask for, and the thief also knew what company ordered them. The college senior storekeeper stated that he never looked at the bill of lading, and he did not call the CCC contractor to verify if they sent someone to pick up the lights.

Clearly, the college senior storekeeper's failure to request any identification or documentation from the thief enabled the thief to easily steal the lights from the loading dock. The college senior storekeeper knew that he should have at least asked the thief for the aforementioned information prior to releasing the lights to him. Moreover, per department guidelines, the college senior storekeeper should have made sure that the lights were logged in and signed for when they were

picked up. As such, the college senior storekeeper's inaction violated Section IV, Paragraphs 34, 38, and 48 of the CCC District-Wide Employee Manual.

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

Following the disciplinary process, the college senior storekeeper was suspended for a period of three days.

OIG Case Number 16-0145

The OIG received a complaint that a director received but failed to submit for processing a check received for catering services that CCC provided. The OIG investigation revealed that the director, by her own admission, lost a \$9,029.28 check issued as payment for a September 2015 CCC-catered event. The director failed to notify anyone, including her supervisor, of the lost check. The director failed to take any steps to obtain a stop payment order request for or obtain a replacement for the check. As such, the director violated Section IV, Paragraphs 34, 38 and 39 of the CCC District-Wide Employee Manual.

It should be noted that as of the date that a stop payment order was placed regarding the check, the check was neither located nor cashed. Subsequently, the customer re-issued a check for the September 21, 2015 event, which was then appropriately processed by CCC.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the director.

The director was placed on a performance improvement plan.

OIG Case Number 16-0101

The OIG received a complaint that two lecturers, who are a married couple, own a book publishing company, and they assigned books published by their publishing company to their courses during various semesters. The OIG investigation revealed that the husband was the president of the publishing company and the wife was the secretary of the publishing company. The publishing company operated out of the lecturers' residence.

The OIG investigation revealed that according to information gathered from CCC's online bookstore provider, the CCC PeopleSoft Campus Solutions system, and syllabi that the OIG was able to obtain, the lecturers assigned books published by their publishing company to many of their courses. In all, the lecturers taught ten courses that are known to have used a book published by their publishing company. The lecturers taught a combined ninety-one sections of these ten courses.

The table that follows details CCC’s online bookstore provider’s purchases of books from the lecturers’ publishing company since the start of the Summer 2014 term through the Spring 2016 term.

Book	Copies	Total Wholesale Cost
Title 1	75	\$2,082.50
Title 2	53	\$1,669.50
Title 3	50	\$1,750.00
Title 4	40	\$1,140.00
Title 5	150	\$5,650.00
Totals	368	\$12,292.00

During the period in which CCC utilized the online book provider, the lecturers taught thirty-two course sections for CCC. This represents about 28% of the total number of course sections that they taught during their CCC careers. The online bookstore provider’s records indicate that since the Summer 2014 term, twenty-eight CCC course sections had a book assigned which was published by the lecturers’ publishing company, and twenty-four of these courses were taught by one of the lecturers. Furthermore, online bookstore provider’s records indicate that the majority of its sales of books published by the lecturers’ publishing company were to students enrolled in one of the lecturers’ courses.

By assigning textbooks published by a company that is owned by the husband to their courses, the lecturers violated Section 5.2.10(1) of the CCC Ethics Policy, which, in turn, is a violation of Section IV(44) of the CCC District Wide-Employee Manual. Likewise, by assigning textbooks published by a company that is owned by the husband to their courses, the lecturers engaged in activities that resulted in a conflict of interest with present CCC employment, in violation of Section IV(12) of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the lecturers.

As of the date of this report, the disciplinary process regarding each of the faculty members was pending.

OIG Case Number 16-0105

The OIG received a complaint in January 2016 that a private entity fraudulently issued continuing education credits using a City College’s continuing education sponsor number. The OIG investigation revealed that between January 2015 and April 2015, during a period that her own continuing education sponsor license was expired, a lecturer, who resigned from CCC employment in May 2015, fraudulently used the City College program’s continuing education sponsor license number on certificates that she issued for the purported completion of continuing education courses that she offered in her personal capacity while working for the private entity.

As a result of the lecturer's resignation from her CCC position and based on the OIG's investigation, the OIG recommended that the lecturer be designated ineligible to be re-hired and that her personnel records reflect this designation.

The lecturer was designated ineligible to be re-hired.

OIG Case Number 16-0224

The OIG received a complaint that a full-time faculty member assigned to a City College was concurrently employed full-time with a local university contrary to the faculty member's collective bargaining agreement and CCC policy. The OIG investigation revealed that from August 2013 and continuing into the Spring 2016 term, the faculty member concurrently served as a full-time faculty member at the City College as well as at the local university. Such dual full-time employment was contrary to the Outside Employment provisions 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*.

Moreover, the OIG investigation revealed that in 2015, the faculty member falsely affirmed on a CCC Outside Employment Certification form that he did not engage in outside employment in 2014 despite the fact that he was employed by the local university since August 2013. The OIG investigation also revealed that the faculty member failed to submit a 2016 CCC Outside Employment Certification form when requested by the Office of Human Resources. The faculty member's failure to submit the certification form in 2016 and his falsification of the certification form in 2015 were contrary to the Outside Employment Policy of Article III of the CCC District-Wide Employee Manual, which in turn were violations of Section IV(42) of the CCC District-Wide Employee Manual.

After his presence was requested by the OIG for an interview, the faculty member resigned from his CCC position. As such and based on the investigation, the OIG recommended that the faculty member be designated ineligible to be re-hired and that his personnel records reflect this designation.

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

OIG Case Number 16-0240

The OIG received a complaint that a shear, a tool used for cutting metal, was stolen from a City College's requisition room. The OIG investigation revealed that on May 13, 2016, an engineer assigned to the City College stole or had unauthorized possession of the CCC-purchased shear. The OIG investigation further revealed that on May 19, 2016, the engineer returned the shear to the City College's mail room. These findings were based on a review of video captured by the college's security camera system.

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

As of the date of this report, the disciplinary process regarding the engineer was pending.

OIG Case Number 16-0228

The OIG received a complaint that a lecturer was collecting fees directly from students contrary to Article 1.7 of the Board Policies and Procedures for Management and Government, which provides that all collections of funds be done at the Business Office. The OIG investigation revealed that for the period of 2014 to the present, two lecturers assigned to a City College collected more than \$18,000 in exam fees directly from students.

Based on the following practices observed during the course of the investigation and/or described by the lecturers during their interviews with the OIG, only good fortune apparently prevented the students' exam fee payments from being stolen or lost:

- The lecturers collected thousands of dollars from students contrary to Article 1.7 of the Board Policies and Procedures for Management and Government, which provides that all collections of funds be done at the Business Office.
- While the money orders that were collected were purportedly maintained in a perpetually locked cabinet, one of the lecturers maintained the key to the locked cabinet in the drawer of her unlocked desk.
- On at least three occasions, one of the lecturers removed envelopes containing possibly thousands of dollars of money orders from the City College and drove the envelopes to a mailbox near her home, possibly after stopping for gas.
- Neither lecturer provided receipts to students who submitted payments.
- Neither lecturer had students acknowledge in writing when a money order was returned to the student because the student became ineligible to take the exam due to the student's failure to pass the appropriate class.
- Although the mailing containing the applications had to be postmarked by a certain date for the students to be eligible for a particular exam date, one of the lecturers mailed the applications and payments via a United States Postal Service mailbox on the street, which would not ensure that the mailing was post-marked by a date certain. Only mailing the package

at a post office or via a delivery company would guarantee that the mailing was timely post-marked.

- By neither utilizing a delivery company nor obtaining tracking services from the United States Postal Service, the lecturers had no proof that a package containing the applications and fees was sent or received.

While the lecturers clearly violated Article 1.7 of the Board Policies and Procedures for Management and Government when they collected the exam fees directly from students, it appeared that such has been a routine practice in similar departments. As such, the OIG did not recommend that CCC take any disciplinary action against the lecturers.

However, in order to limit the risks exhibited by the lecturers' practices regarding the application and fee collection process for the exam, the OIG recommended that the Department of Finance works with the City College to develop and implement policies and procedures specific to the collection of exam fee payments from students and the submission of these fee payments and student exam applications to the testing program.

OIG Case Number 16-0033

The OIG received several complaints that a call center representative assigned to the District Office resided in East Chicago, Indiana. The OIG investigation revealed that the call center representative resided in East Chicago, Indiana, 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 call center representative falsified employment records, in that she fraudulently indicated on the CCC PeopleSoft system that she resided in Chicago, Illinois, when in fact she resided in East Chicago, Indiana, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

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

Following the disciplinary process, the call center representative was terminated, and she was designated ineligible to be re-hired.

OIG Case Number 16-0062

The OIG received a complaint alleging that a janitor assigned to a City College resided in Oak Lawn, Illinois. The OIG investigation revealed that the janitor resided in Oak Lawn, 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 indicated in the CCC PeopleSoft system that she resided in Chicago, Illinois, when in fact she resided in Oak Lawn, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

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

The janitor subsequently resigned from her CCC position, and she was designated ineligible to be re-hired.

OIG Case Number 15-0205

The OIG received a complaint that a full-time faculty member assigned to a City College resided in Oak Park, Illinois. The OIG investigation revealed that the full-time faculty member resided in Oak Park, 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 in 2015 and 2016, she fraudulently affirmed on CCC residency certification documents that she resided in Chicago, Illinois, when in fact she resided in Oak Park, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Additionally, during an interview with the OIG, the full-time faculty member made at least one false statement, in violation of Section IV(8) of the City Colleges of Chicago District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the full-time faculty member be terminated, that she 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 full-time faculty member was pending.

Report Submitted Documenting Investigation that Resulted in Not Sustained Findings but in Which Recommendations Were Made

OIG Case Number 15-0028

The OIG received a complaint alleging that four cadavers were found in a vault at a City College. It was further alleged that these cadavers were at the college for in excess of seven years and were not disposed of appropriately.

During the course of the investigation, the OIG conducted twenty-seven interviews with twenty-five different individuals. Among the individuals interviewed by the OIG were current and past administrators, faculty members, lecturers, and staff members. Neither the interviews nor any documentation found and/or reviewed by the OIG allowed the OIG to determine the origin or identity of the four cadavers.

In about May 2015, the Office of the General Counsel arranged for the Cook County Medical Examiner's Office to receive and document the cadavers. Subsequently, on June 4, 2015, the cadavers were buried at Mount Olivet Cemetery—their identities still unknown.

Based on the issues raised during the course of the investigation, the OIG recommended that CCC develops and institutes policies and procedures regarding the acquisition, use, and ultimate disposition of human cadavers used for educational purposes. Among such policies and procedures should be the designation of the specific position charged with the duty of overseeing the acquisition, use, and ultimate disposition of cadavers at a given City College, as well as the designation of a specific storage location for the paperwork concerning the cadavers.

Reports Submitted Documenting Not Sustained Findings

While it is atypical for the OIG to issue an Investigative Summary documenting the results of a not sustained investigation, due to the public nature in which the allegations in the investigations discussed below were made, the OIG determined that it was necessary to submit Investigative Summaries.

OIG Case Number 16-0112

The Chancellor received a complaint via e-mail from a CCC student's guardian, alleging that a director assigned to the District Office made false statements in a report that he generated regarding an investigation of a complaint made by the guardian on behalf of the student in 2014. At the Chancellor's request, the complaint was forwarded to the OIG.

The OIG investigation did not reveal that the director falsely stated in a September 19, 2014 memorandum documenting the investigation that the student was uncooperative during the course of the investigation. In fact, the guardian's claim was based on her mistaken belief that redacted portions of the report which referred to the lack of cooperation by the subject of the investigation referred to the student. Additionally, contrary to the guardian's claim, the OIG investigation did not reveal that the investigation conducted by the director was otherwise flawed.

Based on the investigation, the OIG did not recommend that any action be taken by CCC.

OIG Case Number 16-0126

The OIG received a complaint that a CCC student was expelled from one of the City Colleges in 2012, and he did not receive appropriate due process prior to his expulsion from the City College. Based on the investigation, the OIG determined that the July 17, 2012 Formal Student Disciplinary Hearing as well as the subsequent appeal process afforded the student appropriate due process prior to his expulsion. As such, the OIG did not make any recommendations.

The OIG determined that an Investigative Summary was necessary in this matter due to the public comments made by the student at the April 7, 2016 Board of Trustees meeting regarding his complaint.