

Office of the Inspector General City Colleges of Chicago



Office of the Inspector General Bi-Annual Report July 1, 2019 – December 31, 2019

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

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Inspector General

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To: Juan Salgado, Chancellor
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From: John A. Gasiorowski, Inspector General

Date: February 3, 2020

RE: Office of the Inspector General *Bi-Annual Report* for the period of July 1, 2019 through December 31, 2019

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 July 1, 2019 through December 31, 2019. Pursuant to Article 2.7.5, the *Bi-Annual Report* for the period of July 1st through December 31st is required no later than March 1st each year.

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.

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

Criminal Charges

On November 19, 2019, as a result of an investigation initiated by the OIG and worked in partnership with the Federal Bureau of Investigation (“FBI”) and the Office of the United States Attorney for the Northern District of Illinois, a federal grand jury indicted three CCC employees (a former vice chancellor, a former project director, and a now former liaison with local government agencies) as well as five CCC vendors. The indictment totaled sixteen counts of wire fraud and two counts of making a false statement to the FBI. Copies of the press release from the United States Attorney for the Northern District of Illinois and the indictment can be accessed at the following link:

<https://www.justice.gov/usao-ndil/pr/federal-indictment-charges-former-vice-chancellor-city-colleges-chicago-devising>

It should be noted that effective May 6, 2017, the same former vice chancellor was terminated from CCC employment, and he was designated ineligible to be

re-hired as a result of two OIG investigations regarding time and attendance-related issues. These two investigations - documented under OIG Case Numbers 17-0166 and 17-0153 - were summarized on pages 19 and 20 of the OIG Bi-Annual Report for the January 1, 2017 to June 30, 2017 reporting period.

Updates to Investigations Documented in Previous Bi-Annual Reports

Updates regarding disciplinary recommendations made during the January 1, 2019 to June 30, 2019 reporting period

In the *Bi-Annual Report* submitted for the January 1, 2019 to June 30, 2019 reporting period, the OIG submitted 14 reports documenting investigations, which resulted in sustained findings of waste, fraud and misconduct. At the time the *Bi-Annual Report* for the January 1, 2019 to June 30, 2019 reporting period was submitted, disciplinary action was pending regarding several of the investigations. 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 January 1, 2019 to June 30, 2019 reporting period.

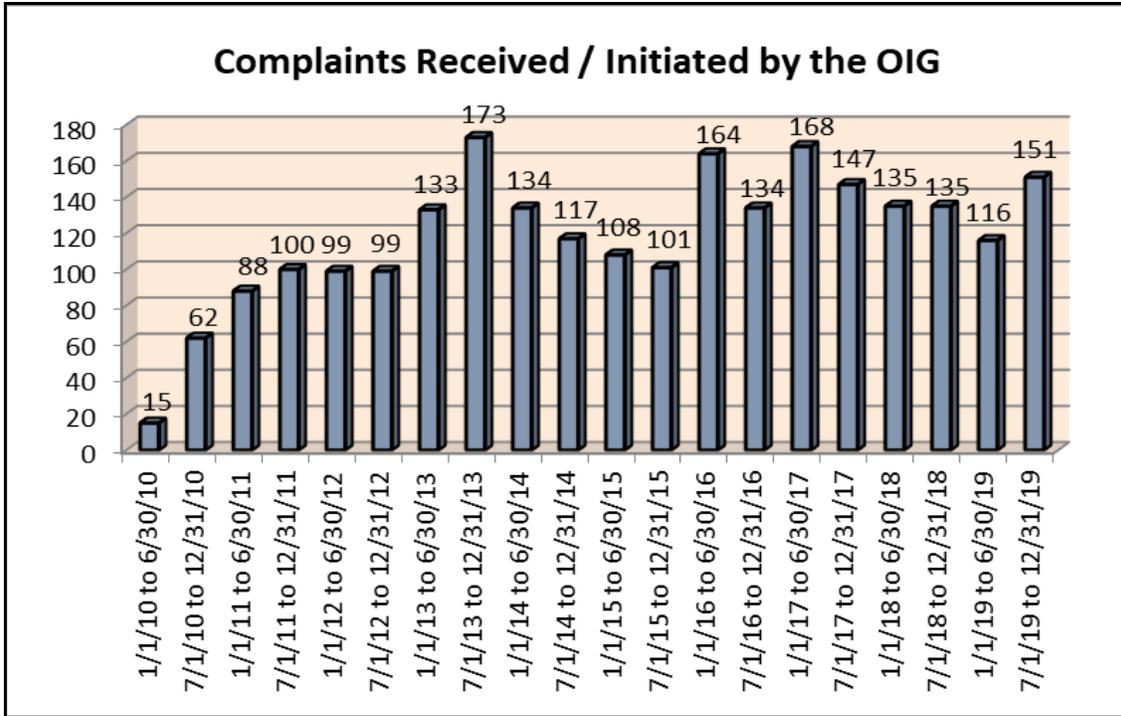
Disciplinary Action Updates from Investigations Reported on in Previous Bi-Annual Report (January 1, 2019 to June 30, 2019)			
Case Number	Title	OIG Recommendation	Final Disciplinary Action Taken
19-0096	College Clerical Assistant II	Appropriate Discipline	1 day suspension and retraining
19-0096	Admissions Specialist	No additional recommendation due to previous resignation / DNRH ¹	
18-0173	Librarian (Part-Time)	Appropriate Discipline	5 days suspension
18-0159 / 18-0173	Librarian (Part-Time)	Appropriate Discipline	1 day suspension
18-0227	Lecturer	Appropriate Discipline	Oral Warning
18-0200	Coordinator - Information Technology	DNRH (following resignation)	
19-0107	Grants - Budget Analyst	Appropriate Discipline	Resignation / DNRH
19-0093	Vice President of Institutional Effectiveness	Appropriate Discipline	Termination
19-0093	District Director of Assessment and Accreditation	Appropriate Discipline	2 weeks suspension
18-0250	Interim President	Appropriate Discipline	Written Warning
18-0250	Permittee	Debarment	Permanent Debarment
18-0250	Permittee	Debarment	Permanent Debarment
19-0090 / 19-0157	Call Center Representative	Appropriate Discipline	Termination / DNRH
16-0218	Full Time Faculty	DNRH (following retirement)	
19-0197	Student Mentor	Appropriate Discipline	Temporary position ended on the day that the Investigative Summary was issued
19-0100	Project Student Records Coordinator	Appropriate Discipline	5 days suspension
19-0209	Coordinator (Part-Time)	DNRH (following retirement)	

Complaints Received

For the period of July 1, 2019 through December 31, 2019, the OIG received 151 complaints. These 151 complaints included complaints forwarded to the OIG from outside sources as well as investigations (or audits / reviews) initiated based on the OIG’s own initiative.² For purposes of comparison, the following graph documents the complaints received by the OIG during the current and previous reporting periods.

¹ “DNRH” means that the individual was designated “do not re-hire” or ineligible to be re-hired.

² 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 151 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 July 1, 2019 to December 31, 2019		
Subject Matter (Allegation)	Number	Percentage
Sexual Harassment	1	0.66%
Failure to maintain confidentiality of CCC employment or other records	2	1.32%
Violation of Outside Employment Policy	2	1.32%
Violation of CCC Computer Use Policy	2	1.32%
Engaging in conduct in violation of the Illinois Compiled Statutes	3	1.99%
Requesting or accepting a leave on fraudulent grounds	3	1.99%
Use of CCC property for unauthorized purposes	3	1.99%
Discourteous Treatment	4	2.65%
Waste of Funds	4	2.65%
Conduct unbecoming a public employee	6	3.97%
Violations of miscellaneous CCC policies	6	3.97%
Residency	9	5.96%
Other Harassment / Discrimination / Retaliation	12	7.95%
Violation of CCC Ethics Policy	12	7.95%
Misappropriation of funds / Theft	12	7.95%
Inattention to Duty	14	9.27%
Falsification of attendance records	23	15.23%
Fraud (including grants, financial aid or tuition)	33	21.85%
Total	151	100.00%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of June 30, 2019, the OIG had 75 pending complaints, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of July 1, 2019 through December 31, 2019, the OIG closed 150 complaints. The following table categorizes the reasons that the OIG closed the 150 complaints during the current reporting period.

Complaints Closed Between July 1, 2019 and December 31, 2019		
Reason Closed	Number	Percentage
Sustained	8	5.33%
Review with Recommendations	1	0.67%
Not Sustained / No Policy Violation	43	28.67%
Not Sustained with Recommendations	1	0.67%
Referred / Deferred	57	38.00%
Subject Inactive	9	6.00%
Duplicate Complaint	14	9.33%
Complaint included with an active investigation	17	11.33%
Totals	150	100.00%

Regarding the complaints closed during the period of July 1, 2019 to December 31, 2019, 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 (January 1, 2019 through June 30, 2019).³

³ A complaint is considered closed only after the investigative activity of the investigator to whom the complaint was assigned has been reviewed and approved by a Supervising Investigator 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	1/1/19 to 6/30/19		7/1/19 to 12/31/19	
	Number	Average Calendar Days to Close	Number	Average Calendar Days to Close
Sustained	14	252	8	253
Review with Recommendations	2	171	1	1140
Completed Board Mandated Audit	1	102	0	--
Not Sustained / No Policy Violation	30	277	43	270
Not Sustained with Recommendations	0	0	1	178
Referred / Deferred	58	1	57	1
Subject Inactive	5	194	9	256
Duplicate Complaint	9	1	14	1
Complaint included with an active investigation	5	2	17	1
Totals	124		150	

As of December 31, 2019, the OIG had 76 pending complaints. Forty-seven of these 76 pending complaints (62%) were received between July 1, 2019 and December 31, 2019, and 10 of these 76 pending complaints (13%) were received between January 1, 2019 and June 30, 2019.

OIG Reports Submitted – July 1, 2019 through December 31, 2019

During the reporting period of July 1, 2019 through December 31, 2019, the OIG submitted 11 reports.⁴ These 11 reports included the following: one report documenting an OIG-initiated review; 8 reports documenting sustained findings of waste, fraud and/or misconduct; and 2 reports documenting not sustained findings, one of which included recommendations.

Report Submitted Documenting OIG-initiated Reviews

OIG Case Number 17-0011 (Review of the use of City of Chicago Department of Fleet and Facility Management fuel cards by CCC employees.)

The OIG initiated a review of the use of City of Chicago Department of Fleet and Facility Management (“2FM”) fuel cards by CCC employees. CCC policies and procedures regarding fuel card use, to the extent that they exist, can be found in the *City Colleges of Chicago Fleet Management Manual*.⁵

⁴ Pursuant to Article 2.7.3 of the Board Bylaws, the Inspector General submits reports to the Chancellor, the Board Chair, and the General Counsel at the conclusion of an investigation with recommendations for disciplinary or other action.

⁵ <http://www.ccc.edu/departments/Documents/Fleet%20Management%20Manual.pdf>.

During the course of the review, and in addition to conducting more than three dozen interviews of CCC and City of Chicago employees, the OIG obtained and reviewed the following records:

- A list of 2FM-issued fuel cards issued to CCC employees during the period of March 23, 2009 through November 7, 2018.
- An updated list of 2FM-issued fuel cards issued to CCC employees as of June 17, 2019.
- An inventory of CCC vehicles assigned to each campus as of February 25, 2019.
- An inventory of CCC vehicles, fuel cans, and diesel cans as of January 2018.
- 2FM reports regarding fuel transactions associated with CCC during the time period of July 1, 2016 to September 27, 2018.
- Lists of CCC authorized drivers, which were dated September 25, 2018 and July 23, 2019, respectively.

The OIG's findings based on the review of the use of 2FM fuel cards by the City Colleges of Chicago employees are as follows:

- A majority of CCC authorized drivers do not have a 2FM fuel card assigned to them. Specifically, the OIG obtained and reviewed the list of authorized drivers that was maintained by the director of risk management. The aforementioned list, which was dated July 23, 2019, contained 364 authorized drivers. As of July 23, 2019, 320 of the 364 authorized drivers on the list were active CCC employees. The OIG compared the list of active employees who are authorized drivers to the list of fuel cards that 2FM issued to CCC employees as of June 17, 2019. This comparison revealed that of the 320 active employees who are authorized drivers, only 87 (27.2%) were active employees who were also issued a fuel card. Thus, a significant majority of CCC authorized drivers do not have fuel cards in accordance with the *City Colleges of Chicago Fleet Management Manual*. Specifically, 233 (72.8%) of the active employees who are authorized drivers did not have a fuel card. The OIG found that a significant majority of the authorized drivers who did not have a fuel card were assigned to the Offices of Safety and Security across the district. At least 166 (71.2%) of the 233 authorized drivers who did not have fuel cards were Safety and Security employees.
- Fuel cards remained active even after the individuals to whom those cards were issued were no longer CCC employees. Specifically, the OIG found that as of November 7, 2018, City of Chicago Department of Fleet and Facility Management (2FM) records indicated that 204 fuel cards were issued to City Colleges of Chicago employees since March 23, 2009. The OIG found that 93 (46%) of the fuel cards indicated on the 2FM records were issued to City Colleges of Chicago employees who were still

employees as of November 2018. However, 111 (54%) of the fuel cards indicated on the 2FM records were issued to individuals who were no longer CCC employees as of November 2018. According to 2FM records as of November 7, 2018, of those 111 fuel cards, 104 (94%) remained active for use and were not returned to 2FM. As of November 7, 2018, 94 (90%) of those 104 cards had been active for one year or more after the individual to whom the card was assigned was no longer a CCC employee.

- Fuel cards of former CCC employees were used by current CCC employees to purchase fuel. Specifically, the OIG reviewed 2FM reports regarding fuel transactions associated with CCC during the time period of July 1, 2016 to September 27, 2018. The OIG found that eight fuel cards were used to purchase fuel after the employees to whom those cards were assigned were no longer employed with the CCC. The OIG found that during the aforementioned time period, those eight fuel cards were used for a total of 571 fuel transactions to purchase a total of 7,102.7 gallons of fuel, which amounted to \$14,577.00.
- At least three active CCC employees were issued 2FM fuel cards; however, they were not CCC authorized drivers.
- A sample of fuel card transactions reviewed by the OIG were found to be reasonable transactions. Specifically, the OIG reviewed the fuel card usage of the 15 fuel cards assigned to CCC employees with the highest amount of fuel transactions. These 15 fuel cards incurred 61.5% of the fuel costs during the period of July 1, 2016 through September 27, 2018. The OIG found that during the aforementioned time frame, all CCC issued fuel cards made a total of 3,272 fuel transactions, which resulted in a total cost of \$100,367.23 in fuel. Fifteen of those fuel cards made a total of 1,664 (50.9%) transactions, which resulted in a total cost of \$61,684.01 (61.5%). Overall, the OIG found that the fuel transactions for these 15 fuel cards were for valid City Colleges of Chicago vehicles and were for quantities that were reasonable for the vehicles.
- Various CCC departments use different methods to transport and store a significant amount of fuel in fuel cans. However, the OIG did not find a specific CCC policy regarding the appropriate method for transporting and storing fuel in fuel cans.
- The *City Colleges of Chicago Fleet Management Manual* does not include a detailed process regarding how the eligibility of authorized drivers should be monitored.

Based on the review, the OIG recommended the following:

1. The OIG recommended that the user departments of all CCC employees who are authorized drivers, request a fuel card for each employee who is a City Colleges of Chicago authorized driver.
2. The OIG recommended that all fuel cards that were assigned to individuals who are no longer CCC employees be returned to 2FM for proper deactivation and disposal.
3. The OIG recommended that the practice of more than one employee using a particular fuel card be immediately discontinued. Rather, an employee who needs to purchase fuel for CCC purposes should obtain a fuel card from 2FM that is assigned only to that employee and that is used only by the assigned employee.
4. The OIG recommended that the director of risk management, in conjunction with the supervisors of the CCC employees who have fuel cards assigned to them but are not CCC authorized drivers, determine whether those employees must have fuel cards and thus complete the CCC authorized driver process.
5. The OIG recommended that written policies and procedures regarding the purchase, transport, and storage of fuel in fuel cans be implemented.
6. The OIG recommended that the *City Colleges of Chicago Fleet Management Manual* be amended to include the specific process that should be completed in order to monitor the continued eligibility of authorized drivers, including whether the director of risk management should obtain and review directly from the Illinois Secretary of State, the driving records of all authorized drivers on an annual basis.
7. The OIG recommended that the Department of Administrative Services in conjunction with Risk Management, provide training regarding the *City Colleges of Chicago Fleet Management Manual* to all CCC employees who purchase fuel for CCC purposes.

The OIG received the following response:

Upon review of the subject Office of the Inspector General (OIG) report, the Offices of Administrative Services and Risk Management jointly submit the following response to the recommendations of the OIG:

Response to Recommendation 1: The Offices of Administrative Services and Risk Management do not concur with this recommendation. The roles performed by authorized drivers vary. The issuance of a fuel card should depend on the role

each employee plays and the need (or lack thereof) to fuel vehicles. This decision should be made by the relevant department head in collaboration with the AVC, Administrative Services. Providing a fuel card for all authorized drivers would increase the risk of misuse, as well as significantly increase the administrative burden to manage the program. That said, Administrative Services and Risk Management agree that the CCC Fleet Manual should be revised to be clearer on this point and that fuel cards should not be shared. Administrative Services and Risk Management shall undertake a revision of the manual to address this point (as well as the other recommendations from this OIG report). The manual will be revised to state that issuance of a fuel card is based upon the determination of need. This section shall also reiterate that fuel cards may not be shared among employees and employees that have not been issued a fuel card are therefore not authorized to purchase fuel on behalf of the District. Additionally, the process for fuel card requests shall be revised to include an affirmation from each card holder that the fuel card is for his/her exclusive use for CCC business purposes only.

Response to Recommendation 2: We concur with this recommendation. Administrative Services will obtain a list of fuel (sic) active fuel cards with 2FM and compare with a list of active employees. For any separated employees, Administrative Services will request that the college return the fuel card to its office. Administrative Services will then return those fuel cards to 2FM along with the 2FM deactivation form. If the college cannot produce the fuel card, Administrative Services will still complete and submit a deactivation form to 2FM. Additionally, the Office of Risk Management shall coordinate with Human Resources to create standard procedures to retrieve fuel cards for separating employees.

Response to Recommendation 3: We concur with this recommendation. The Fleet Manual and the fuel card application process shall be revised to address this point. Upon distribution of the updated manual this directive shall be highlighted in email and at training sessions, as appropriate.

Response to Recommendation 4: We concur with this recommendation. The Director of Risk Management shall determine, in collaboration with the appropriate supervisors if the employees need to be authorized drivers. If that determination is in the affirmative, the director of risk management shall vet the drivers through the process outlined in the fleet manual. If approved as an authorized driver, the AVC, Administrative Services shall determine, in collaboration with the appropriate supervisors, if a fuel card is required by their roles. If not approved as authorized drivers by Risk Management, Administrative Services shall deactivate any fuel cards already assigned to these employees. This action was initiated by the Director of Risk Management with the appropriate Supervisors on September 30, 2019.

Response to Recommendation 5: We concur with this recommendation. The director of risk management, in collaboration with district chief engineers, shall research best practices and procedures (e.g., OSHA) for transport and storage of fuel in fuel cans. These best practices shall be integrated into the revised Fleet manual. Administrative Services shall also update the Fleet manual to specifically address fuel purchase for equipment, such as generators, snowblowers, etc. The usage/ fueling audit sheet shall be revised to allow entry of purchases made using fuel cans to ensure tracking and invoice verification.

Response to Recommendation 6: We partially concur with this recommendation. Currently, the director of risk management conducts annual vetting of all authorized drivers through its insurance carrier. The Fleet Manual shall be revised to reflect this annual vetting process by the insurance carrier.

Response to Recommendation 7: We concur with this recommendation. The manual was first released in in December 2017 and was again sent to relevant department heads as in January 2019 as a refresher. Following the completion of updates to the manual in response to the other recommendations in this report, the Offices of Administrative Services and Risk Management shall conduct training on fleet policies and procedures. Departments that shall receive such training include Safety & Security, Engineering, and Athletics, as well as the specialized academic programs at Olive-Harvey that typically purchase fuel for their vehicles.

Subsequently, the OIG received the following response from the General Counsel:

I appreciate the efforts to address issues brought to our attention by the Inspector General. I was not brought into the loop regarding a response to this matter prior to (the associate vice chancellor of Administrative Services') attached response being distributed. Our Director of Risk Management will continue to assist with addressing questions raised by the IG Report, however; we should be clear that in the past and going forward (the Director of Risk Management's) only role regarding this matter is to vet employees regarding whether or not they should be an authorized driver. All other matters fall under our capable Office of Administrative Services.

Accordingly, I object to Recommendation #4 and Recommendation #7 as they relate to the Director of Risk Management's participation. Such matters that are the responsibility of the Office of Administrative Services, should remain their sole responsibility,

I want to be clear regarding this matter as I do not want our esteemed Director of Risk Management inappropriately held responsible for items that do not fall under his purview as Director of Risk Management. Accordingly, any changes to documents or policies referenced in the attached response should be in line with my above comments.

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

OIG Case Number 19-0144

The OIG initiated an investigation of the head coach of the men's basketball team at a City College based on a complaint received alleging that the head coach allowed a non-student athlete to attend a trip to an out-of-town tournament. While the OIG investigation did not establish a violation of any policies regarding the trip to the out-of-town tournament, the OIG investigation did reveal the following:

- The head coach used his CCC-issued computer to create/alter and submit fraudulent gas receipts and non-final gas receipts to justify the expenditure of cash advance funds and/or reimbursements.
- The head coach used his CCC-issued computer to create and submit receipts for a restaurant owned by his uncle to justify the expenditure of cash advance funds and/or reimbursements.
- The head coach used his CCC-issued computer to create fraudulent university transcripts for two players on the 2017-2018 City College men's basketball team.
- The head coach arranged for a basketball skills camp at the City College in July 2018, but the camp operator failed to obtain \$1 million in combined insurance for the basketball camp.

In engaging in the above activities, the head coach violated Section IV, paragraphs 6, 11, 15, 17, 45, and 50 of the CCC District-Wide Employee Manual as well as Article 8 of the Board Policies and Procedures for Management and Government, and the Policies and Guidelines Governing the Use of Computing and Technology Resources of CCC.

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

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

OIG Case Number 20-0005

The OIG received a complaint that on July 15, 2019, a lead security officer assigned to a City College satellite facility, swiped in at the City College's main campus ("main campus"), and then she received a ride from a security officer (security officer 1), who was already on duty, to the satellite facility ("satellite

facility”), her assigned work site. It was further alleged that this has happened in the past, possibly with other employees too. Based on this complaint, the OIG initiated an investigation.

During the course of the investigation, the OIG reviewed CCCWorks time and attendance records and CCC access records for the security officers assigned to the satellite facility. This review revealed that the lead security officer, security officer 1, and security officer 2, who was also assigned to the satellite facility, all swiped in at the main campus on various occasions despite being assigned to the satellite facility. Thus, the OIG investigation centered on these three employees during the period of May 1, 2019 through August 8, 2019.

In brief summary, the OIG investigation revealed that during the period of May 1, 2019 to August 8, 2019, the lead security officer, security officer 1, and security officer 2 routinely swiped in at the main campus near in time to their scheduled start times. They then proceeded to the satellite facility, at which they arrived anywhere from sixteen minutes (00:16) to one hour and thirteen minutes (01:13) after their scheduled start times, despite being paid from the time that they swiped-in. The table below summarizes the frequency and scope of their actions.

Analysis of Swipes In - May 1, 2019 to August 8, 2019						
Employee	Total Workdays	Total Days Inappropriately Swiping in at the Main Campus	% of Days Inappropriately Swiping in at the Main Campus	Total Time Lost Due to Inappropriately Swiping in at the Main Campus (hrs:mins)	Pay Rate	Total Damages
Lead Security Officer	58	41	70.69%	18:59	\$21.82	\$414.22
Security Officer 1	58	29	50.00%	15:03	\$20.00	\$301.00
Security Officer 2	42	28	66.67%	11:38	\$20.00	\$232.67
Totals	158	98	62.03%	45:40:00		\$947.89

The OIG investigation further revealed that on a significant portion of the occasions on which the lead security officer, security officer 1, and/or security officer 2 swiped in at the main campus prior to travelling to their actual work site at the satellite facility, they did so in the presence of another. The table below summarizes the occasions in which the employees swiped in contemporaneously with another when she or he swiped in at the main campus before traveling to the satellite facility to start actually performing their security duties:

Analysis of Contemporaneous Swipes In - May 1, 2019 to August 8, 2019					
Employee	Total Workdays	Total Days Inappropriately Swiping in at the Main Campus	Total Days Inappropriately Swiping in at the Main Campus with the Lead Security Officer	Total Days Inappropriately Swiping in at the Main Campus with Security Officer 2	Total Days Inappropriately Swiping in at the Main Campus with Security Officer 1
Lead Security Officer	58	41	--	14	18
Security Officer 1	58	29	18	0	--
Security Officer 2	42	28	14	--	0
Totals	158	98	32	14	18

Additionally, the OIG investigation revealed that on as many as nine occasions, security officer 1 swiped in for work, left his work site, drove to and picked up the lead security officer, and drove her to swipe in at the main campus and/or to the satellite facility.

The actions of the three employees violated Section IV, paragraphs 4, 7, 11, 17, 46, and 50 of the CCC District-Wide Employee Manual.

Based on the investigation, the OIG recommended that the lead security officer, security officer 1, and security officer 2 be terminated. The OIG further recommended that each of these employees be designated ineligible to be re-hired and that their personnel records reflect this designation.

Following the disciplinary process, the lead security officer and security officer 1 were terminated, and each was designated ineligible to be re-hired. Security officer 2 resigned from her CCC position, and she was designated ineligible to be re-hired.

OIG Case Number 19-0161

The OIG initiated two investigations regarding an associate dean assigned to a City College based on complaints received. One of the investigations (19-0161) resulted in a sustained finding of misconduct, which will be summarized here. The other investigation (19-0185) resulted in not sustained findings, but in which the OIG made recommendations. That investigation will be summarized subsequently in this Bi-Annual Report under the section titled, "Report Submitted Documenting Not Sustained Findings with Recommendations."

Regarding OIG Case Number 19-0161, the OIG received a complaint that the associate dean was falsifying her attendance records. The OIG received a subsequent complaint alleging that on a given date, the associate dean

conducted political activity during working hours, and she was on a Spanish-language media outlet, during working hours.

The OIG investigation revealed the following:

- On three occasions in February 2019, the associate dean appeared on a Spanish-language media outlet, live-stream panel discussion regarding Chicago politics during her working hours. The associate dean subsequently requested one-half days off for each of these days, but only after between one week and one month had passed and only after the OIG requested her presence for an interview.
- On at least five other occasions in February 2019, the associate dean arrived at her assigned City College well after her 9:00 a.m. start time, and she remained at the City College for less than her expected full workday.

The associate dean's actions violated Section IV, paragraphs 2, 7, 38, and 50 of the CCC District-Wide Employee Manual.

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

The associate dean was suspended for a period of five workdays.

OIG Case Number 19-0184

The OIG received a complaint that a network support analyst stationed at a City College constantly arrives late, vapes in the storage area, leaves early, takes long breaks, and hangs out in the student area instead of doing actual work. Based on this complaint, an investigation was initiated.

However, prior to the completion of the OIG investigation, the OIG learned that CCC took disciplinary action against the network support analyst for various work-related issues including leaving the department without proper authorization, in that he unreasonably took six to eight "breaks" a day. Following a pre-disciplinary hearing, the network support analyst was suspended for a period of five days.

As a result of the disciplinary action taken, the OIG narrowed its investigation to determine if the network support analyst worked full days, full weeks and full pay periods.

Pursuant to a review of the network support analyst's time and attendance during the period of March 18, 2019 through August 2, 2019, the OIG investigation revealed the following:

- On at least 6 of the 9 (67%) pay periods for which the network support analyst's actual hours worked could be identified and calculated, he failed to work a full pay period, despite being paid for working a full pay period.
- On at least 12 of the 19 (63%) weeks for which the network support analyst's actual hours worked could be identified and calculated, he failed to work a full workweek, despite being paid for working a full workweek.
- On at least 57% of the days (47 of 82 days) that the network support analyst worked, he failed to work a full 7.5-hour workday, despite being paid for working a full workday.
- On 43% of the days (35 of 82 days) that the network support analyst worked, he left the campus for no work-related reason, was away from the campus for more than one hour, and worked less than a 7.5-hour day. For all of these days, the network support analyst was paid for working a full day.

Based on the investigation, the OIG recommended that CCC takes appropriate disciplinary action against the network support analyst.

The network support analyst was subsequently terminated.

OIG Case Number 20-0005

A part-time alternative high school mentor ("mentor") at a Middle College of a City College remained in his position essentially until he became a full-time employee of a grant provider. In his new role, the mentor was assigned to work at the Middle College.

The OIG investigation revealed that during the period of March 22, 2019 through June 28, 2019, the mentor swiped in as working for CCC on twelve occasions. On eleven of the twelve occasions that the mentor swiped in as working for CCC during this period, the times that the mentor represented that he was working for CCC and the times that he represented that he was working for the grant provider overlapped. The mentor was paid by both entities for these same overlapping hours. The overlapping time totaled thirty-six hours.

At the very least, the mentor's actions violated Section IV, paragraphs 17 and 50 of the CCC District-Wide Employee Manual.

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

The alternative high school mentor's position was subsequently eliminated.

OIG Case Number 19-0136

After initiating an investigation based on the OIG's own initiative, the OIG received three additional complaints alleging that the president of a City College resided outside the City of Chicago in Skokie, Illinois. The OIG investigation revealed that the president resides in Skokie, 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 president 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 Skokie, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

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

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

OIG Case Number 18-0197

The OIG received a complaint that a project clerk assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the project clerk resided in Calumet City, 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.

After being advised that the OIG requested her presence for an interview and that the subject of interview would concern her compliance with the CCC Residency Policy, the project clerk resigned from her position with the City Colleges of Chicago. As such and based on the OIG investigation, the OIG recommended that the project clerk be designated ineligible to be re-hired and that her personnel records reflect this designation.

The project clerk was subsequently designated ineligible to be re-hired.

OIG Case Number 19-0143

The OIG received two complaints that a college advisor assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the college advisor resided in Evanston, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the City Colleges of Chicago District-Wide Employee Manual.

The OIG investigation further revealed that the college advisor 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 Evanston, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

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

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

Report Submitted Documenting Not Sustained Findings with Recommendations

OIG Case Number 19-0185

The OIG received a complaint that an associate dean assigned to a City College was abusing her authority by hiring family and friends who are not qualified to teach. This is same associate dean discussed previously on pages 14 and 15 of this Bi-Annual Report under the summary for OIG Case Number 19-0161.

The OIG investigation revealed the following:

- The purported relative hired by the associate dean was the sister (employee 1) of the associate dean's son's girlfriend. Pursuant to Article 5.2.2(bb) of the CCC Ethics Policy, employee 1 was not a "relative" of the associate dean. Thus, the associate dean's involvement in the hiring of employee 1 did not implicate the Employment of Relatives provisions (Article 5.2.8) of the CCC Ethics Policy.
- Even if employee 2 was a "friend" of the associate dean, the associate dean's involvement in the hiring of employee 2 did not implicate the CCC Ethics Policy.
- Employee 1's and employee 2's qualifications for the instructor position were scarce and/or pretty thin and therefore problematic. Neither met the qualifications for the position based on the most objective criterion, that being their educational background, particularly their lack of relevant/required degrees, and their teaching experience.

The only qualifications that they purportedly met were the most subjective ones, those being their sample lesson plans and presentations during their interviews. Based on their interviews with the OIG, it appears that the

associate dean and a manager significantly relied on the candidates' lesson plans and the candidates' presentations in making their decisions to hire each candidate.

However, while the hiring of both individuals may have demonstrated a lack of judgement on the part of the associate dean, there was a lack of evidence to establish that the associate dean violated any specific CCC policies in hiring either employee 1 or employee 2. As such the OIG made no recommendation of disciplinary action regarding the associate dean.

Based on the investigation, the OIG made the following recommendations:

- Due to the fact that employee 1's and employee 2's qualifications for the instructor position were scarce and/or pretty thin, the OIG recommended that the Office of Academic and Student Affairs conducts a thorough evaluation of employee 1's and employee 2's qualifications, as well as their teaching performances since their hiring, in order to determine whether they should continue as CCC instructors.
- Due to the fact that various documents purportedly submitted or otherwise created during the hiring process could not be located - such as sample lesson plans created by the candidates - the OIG recommended that the Office of Human Resources adopts policies and procedures to ensure that all documents submitted and created during the hiring process, including during the interview process, be stored in a single location, possibly within the Taleo system, to ensure that all documentation can be reviewed, if necessary.

Reports Submitted Documenting Not Sustained Findings of Waste, Fraud and/or Misconduct

OIG Case Number 19-0014

Between June 28, 2018 and July 2, 2018, five still in-the-box laptop computers were stolen from a City College. Between August 13, 2018 and August 20, 2018, four additional still in-the-box laptop computers and three iPads were stolen from the same City College. The OIG was not able to obtain sufficient evidence to determine who took the nine Apple MacBook Pro laptop computers and three Apple iPads.

However, the OIG, with the cooperation of the Office of Information Technology, was able to recover three of the laptop computers and two of the iPads. Four of these items were obtained from a person who was selling the items on eBay, and one of these items was obtained from a person who purchased the item on eBay.

The incidents were reported to the Chicago Police Department, and the OIG discussed the case with the Cook County State's Attorney's Office. No criminal charges have been filed. The OIG returned the recovered items to the City College from which they were stolen.