

CITY COLLEGES[®]
OF CHICAGO

**OFFICE OF THE INSPECTOR GENERAL
BI-ANNUAL REPORT**

JANUARY 1 – JUNE 30
2022

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



LAMESHA SMITH
INSPECTOR GENERAL

CITY COLLEGES OF CHICAGO

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CITY COLLEGES[®]

OF CHICAGO

To: Juan Salgado, Chancellor
Dr. Walter E. Massey, Chair of the Board of Trustees
Elizabeth Swanson, Vice-Chairperson of the Board of Trustees
Peggy A. Davis, Secretary of the Board of Trustees
Karen Kent, Trustee
Laritza Lopez, Trustee
Deborah H. Telman, Trustee
Darrell A. Williams, Trustee
Neith Tiri-Xi'ui Zurhvan, Student Trustee

From: Lamesha Smith, Inspector General

Date: August 16, 2022

RE: Office of the Inspector General *Bi-Annual Report* for the period of January 1, 2022 through June 30, 2022

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, 2022 through June 30, 2022. Pursuant to Article 2.7.5, the *Bi-Annual Report* for the period of January 1st through June 30th is required no later than September 1st each year.

Article 2.7 et seq. of the Board Bylaws authorizes the OIG for the City Colleges of Chicago to conduct investigations regarding waste, fraud and misconduct by any officer, employee, or member of the Board; any contractor, subcontractor, consultant or agent providing or seeking to provide goods or services to the City Colleges of Chicago; and any program administered or funded by the District or Colleges.

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

The Office of the Inspector General for the City Colleges of Chicago has the authority to conduct investigations regarding waste, fraud and misconduct by any officer, employee, 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 full scope of the powers and duties of the OIG can be found in Article 2.7 of the Bylaws of the Board of Trustees, which can be accessed here: <https://www.ccc.edu/departments/Documents/Board%20Bylaws.pdf>.

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.

Make a Confidential Complaint

Anyone can make a confidential complaint regarding waste, fraud and misconduct involving CCC programs, Board members, officials, employees, or those doing or seeking to do business with CCC in any manner with which they are comfortable, including the methods listed below:

- **Clicking** [here and submitting](#) a confidential complaint online
- **Sending** an e-mail to InspectorGeneral@ccc.edu
- **Calling** the OIG Fraud Hotline at (312) 553-3399
- **Mailing** a letter to:
The Office of the Inspector General
City Colleges of Chicago
740 North Sedgwick Street
Suite 310
Chicago, Illinois 60654
- **Making** an in-person complaint at 740 North Sedgwick, Suite 310

New Developments

Updates to Federal Criminal Case

As discussed in the *OIG Bi-Annual Report* for the period of July 1, 2019 through December 31, 2019, 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.¹ The indictment totaled sixteen counts of wire fraud and two counts of making a false statement to the FBI.

In the *Bi-Annual Report*, for the reporting period of July 1, 2020 through December 31, 2020, the OIG detailed the dispositions regarding two of the defendants. During the reporting period of July 1, 2021 through December 31, 2021, the OIG received restitution payments for those two defendants. Those restitution payments are detailed in the *Bi-Annual Report* covering the period of July 1, 2021 through December 31, 2021.

During the reporting period of January 1, 2022 through June 30, 2022, the OIG received additional restitution payments. The details are summarized as follows.

- Tiffany Capel, the principal of a now former CCC vendor, was originally charged with one count of wire fraud.² In August 2020, Tiffany Capel entered into an Agreement to Defer Prosecution, which was approved by Judge Dow of the United States District Court for the Northern District of Illinois on August 17, 2020. Under the terms and conditions of the agreement, Tiffany Capel agreed not to violate any laws as well as to abide by various other terms and conditions, including paying \$15,000 in restitution to CCC. Previous to the reporting period of January 1, 2022 through June 30, 2022, the OIG received partial restitution payment checks totaling \$1,000.00 for Tiffany Capel. Subsequently, the OIG provided the aforementioned restitution checks to the CCC Controller’s Office for deposit into CCC’s treasury. The restitution payments that the OIG received for Tiffany Capel during the

¹ 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>.

² As was documented in the *Bi-Annual Report*, for the period of January 1, 2021 through June 30, 2021, effective August 5, 2021, Tiffany Capel and the vendor company were permanently debarred from doing any future business with CCC.

reporting period of January 1, 2022 through June 30, 2022 are as follows:

- In January 2022, the OIG received another partial restitution payment in the amount of \$200.00 via check for Tiffany Capel. Subsequently, the OIG provided the aforementioned restitution check to the CCC Controller's Office for deposit into CCC's treasury.
- In March 2022, the OIG received another partial restitution payment in the amount of \$300.00 via check for Tiffany Capel. Subsequently, the OIG provided the aforementioned restitution check to the CCC Controller's Office for deposit into CCC's treasury.
- In June 2022, the OIG received another partial restitution payment in the amount of \$300.00 via check for Tiffany Capel. Subsequently, the OIG provided the aforementioned restitution check to the CCC Controller's Office for deposit into CCC's treasury.
- As of June 30, 2022, the OIG had received a total of \$1,800.00 of the \$15,000.00 in restitution that Tiffany Capel owes to CCC.

Updates to Investigations Documented in Previous Bi-Annual Reports

Updates regarding recommendations made during the July 1, 2021 to December 31, 2021 reporting period

Among the reports documented in the *Bi-Annual Report* submitted for the July 1, 2021 to December 31, 2021 reporting period, the only outstanding update was regarding a recommendation that the OIG made relevant to OIG Case Number 22-0019.

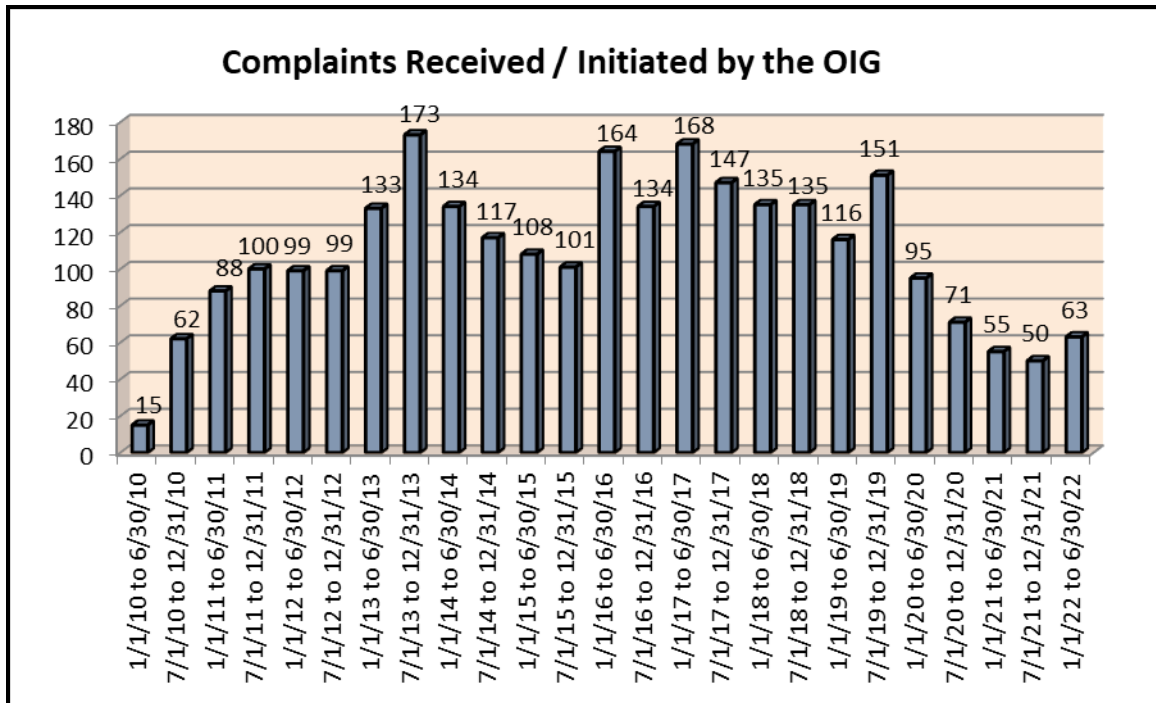
Regarding OIG Case Number 22-0019, the OIG submitted a report documenting an OIG investigation which revealed the following regarding a part-time lecturer assigned to a City College:

- During the Fall 2021 term while teaching his assigned classes, the lecturer used his CCC Zoom account and displayed bookmarked tabs with descriptions and/or the portion of a name of websites of a pornographic/sexually explicit nature on the screen of his personal laptop, which may have caused discomfort or embarrassment to others, in violation of Section III of the District-Wide Employee Manual, specifically the Policies and Guidelines Governing the Use of Computing and Technology Resources.
- During the Fall 2021 term while teaching his assigned classes, the lecturer used his CCC Zoom account and displayed obscene or pornographic text on his bookmarked tabs, in violation of Article 6.4 of the Acceptable Use Policy, as outlined in the Board Policies and Procedures for Management and Government.
- The lecturer was inattentive to his duty as a representative of CCC, in that, while in the performance of his duties as a lecturer, during numerous class sessions via Zoom, he displayed bookmarked tabs with descriptions and/or the portion of a name of websites of a pornographic/sexually explicit nature on the screen of his personal laptop, in violation of Section IV(38) of the District-Wide Employee Manual.

Based on the OIG investigation, the OIG recommended that CCC takes appropriate disciplinary action against the lecturer. Subsequent to the disciplinary process, the part-time lecturer was terminated and designated ineligible to be re-hired.

Complaints Received

For the period of January 1, 2022 to June 30, 2022, the OIG received 63 complaints. These 63 complaints included complaints submitted to the OIG from outside sources as well as investigations (or audits / reviews) initiated based on the OIG's own initiative.³ The following graph documents the complaints received by the OIG during the current and previous reporting periods.



The 63 complaints received represent a variety of subject matters. The following table documents the subject matters of the complaints received.

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

Subject Matter of Complaints Received from January 1, 2022 to June 30, 2022		
Subject Matter (Allegation)	Number	Percentage
Board Mandated Audit	1	1.59%
Falsification of documents	1	1.59%
Use of CCC property for unauthorized purposes	1	1.59%
Giving preferential treatment	1	1.59%
Conduct unbecoming a public employee	1	1.59%
Misappropriation of funds	1	1.59%
Violation of Procurement Policy	1	1.59%
Violation of Computer Use Policy	1	1.59%
Engaging in conduct in violation of the Federal Statutes	1	1.59%
Engaging in conduct in violation of the Illinois Compiled Statutes	1	1.59%
Discrimination	1	1.59%
Violation of Title IX	1	1.59%
Incompetence in the performance of the position	1	1.59%
Retaliation	1	1.59%
Hostile learning environment	3	4.76%
Violation of Outside Employment Policy	3	4.76%
Theft	5	7.94%
Fraud (including identity theft and suspicious email)	5	7.94%
Violation of CCC Ethics Policy	6	9.52%
Residency	6	9.52%
Inattention to duty	6	9.52%
Unfair treatment	7	11.11%
Falsification of attendance records	8	12.70%
Total	63	100.00%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of December 31, 2021, the OIG had 64 pending complaints, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of January 1, 2022 through June 30, 2022, the OIG closed 57 complaints. The following chart categorizes the reasons that the OIG closed the 57 complaints during the current reporting period.

Complaints Closed Between January 1, 2022 to June 30, 2022		
Reason Closed	Number	Percentage
Completion of Board Mandated Audit	1	1.75%
Sustained	2	3.51%
Completion of Review & Report Submitted with Recommendations	1	1.75%
Not Sustained but Report Submitted with Recommendations	1	1.75%
Not Sustained / No Policy Violation	20	35.09%
Referred / Deferred	17	29.82%
Subject Inactive	2	3.51%
Duplicate Complaint	6	10.53%
Complaint Included with Another Active Investigation	6	10.53%
Administratively Closed	1	1.75%
Totals	57	100.00%

Regarding the complaints closed during the period of January 1, 2022 to June 30, 2022, the table below documents the average number of calendar days between the date that the complaints were received and the date that the complaints were closed as compared to the average number of calendar days between the date that complaints were received and the date that complaints were closed for the complaints closed during the previous reporting period (July 1, 2021 to December 31, 2021).⁴

⁴ A complaint is considered closed only after the investigative activity of the investigator to whom the complaint was assigned has been reviewed and approved by a Supervising Investigator or the Assistant Inspector General and then the Inspector General. In situations where a complaint is sustained, the complaint is not considered closed until the Investigative Summary documenting the investigation is prepared and submitted pursuant to Article 2.7.3 of the Board Bylaws.

Average Calendar Days to Close				
Reason Closed	7/1/21 to 12/31/21		1/1/22 to 6/30/22	
	Number	Average Calendar Days to Close	Number	Average Calendar Days to Close
Sustained	2	181	2	724
Completed Board Mandated Audit	0	-	1	148
Completion of Review & Report Submitted with Recommendations	0	-	1	400
Not Sustained but Report Submitted with Recommendations	0	-	1	392
Not Sustained / No Policy Violation	25	193	20	189
Referred / Deferred	14	4	17	5
Subject Inactive	5	304	2	161
Duplicate Complaint	2	2	6	1
Complaint Included with an Active Investigation	3	0	6	143
Administratively Closed	1	1	1	0
Totals	52		57	

As of June 30, 2022, the OIG had 70 pending complaints. Twenty (20) of these 70 pending complaints (28.6%) were received between January 1, 2022 and June 30, 2022, and 14 of these 70 pending complaints (20%) were received between July 1, 2021 and December 31, 2021.

OIG Reports Submitted – January 1, 2022 to June 30, 2022

During the reporting period of January 1, 2022 to June 30, 2022, the OIG submitted reports regarding one review, three investigations, and one audit.⁵ These reports were regarding the following: one OIG-initiated review; two investigations regarding sustained findings of waste, fraud and/or misconduct; one investigation regarding not sustained findings of waste, fraud, and/or misconduct, but in which a recommendation was made; and the annual Board-mandated audit of the District's compliance with the CCC Residency Policy.

Report Submitted Documenting an OIG Review

OIG Case Number 21-0117

The OIG initiated a review of active CCC vendors to determine if any active vendors have been debarred by government agencies. The OIG reviewed debarred vendors lists from the City of Chicago "Sister Agencies," and other government agencies. This review revealed the following:

- The OIG reviewed the debarred vendor lists from other city, county and State government agencies and identified four (4) vendors on the CCC active vendors list that have been permanently debarred by other government agencies that are not on the CCC Debarred Vendors List. The OIG further found that among the four (4) vendors, there were two (2) principals that are also CCC vendors.
- The OIG identified 268 entities/individuals that have been permanently debarred by other government agencies that are not CCC vendors and are not on the CCC Debarred Vendors List.
- The OIG identified two (2) entities and one (1) individual/principal, that are currently temporarily debarred by other government agencies, that are not CCC vendors and are not on the CCC Debarred Vendors List.
- The OIG found that the CCC PeopleSoft Finance database had duplicate active vendors. Specifically, the OIG identified 70 instances in which it appeared that a vendor had multiple accounts with different CCC supplier numbers (duplicate vendors), which constitutes 0.79% of all 8,768 active vendors as of March 18, 2022.

⁵ Pursuant to Article 2.7.3 of the Board Bylaws, the Inspector General submits reports to the Chancellor, the Board Chairperson, and the General Counsel at the conclusion of an investigation with recommendations for disciplinary or other action.

- The OIG found what appeared to be 16 duplicate vendors that were missing a total of 24 Tax Identification Numbers. The 16 vendors account for a total of 34 vendor supplier numbers.
- The CCC PeopleSoft Finance vendor database contained 8,768 active vendors, as of March 18, 2022. From the total active vendors, the OIG found the following regarding *inactive* vendors, which the OIG defined as vendors with no activity for two or more years.
 - The OIG found that only 2,291 or 26.13% active vendor supplier numbers had activity between 2020 and 2022.
 - The OIG found that 6,477 or 73.87% of the active vendors were *inactive* or had no activity between 2013 and 2019.
 - The OIG found that 5,268 or 81.33% of the 6,477 *inactive* vendors are classified as servicers, suppliers, and other vendors.
 - The OIG found that 1,209 or 18.67% of the 6,477 *inactive* vendors are classified as employees, students or retirees.
 - The OIG found that the Department of Procurement Services last completed an archiving of inactive vendors in 2016.

Based on the review, the OIG recommended the following:

1. The OIG recommended that CCC initiates the process to permanently debar the four (4) vendors and (2) principals that are CCC vendors that have been permanently debarred by other government agencies, from doing any future business with CCC, pursuant to Article 5.3.3(j)(16) of the CCC Debarment Policy. The OIG recommended that subsequent to CCC debarring those four (4) vendors and (2) principals, that the CCC Department of Procurement Services then updates the debarment list to include those debarments.
2. The OIG recommended that the CCC Department of Procurement Services records and flags the 268 entities and individuals the OIG identified that were permanently debarred by other government agencies, but that are not CCC vendors and are not included in the CCC Debarred Vendors List.
3. The OIG recommended that CCC records and flags the two (2) entities and one (1) individual/principal that are currently temporarily debarred by other government agencies, but that are not CCC vendors and are not included in the CCC Debarred Vendors List.

4. Master vendor lists should be reviewed for inactive vendor accounts to prevent duplication and fraud. The OIG recommended that the CCC Department of Procurement Services establishes a timetable by which to review and, in conjunction with the Office of Information Technology, archive inactive vendor accounts in the CCC PeopleSoft Finance vendor database after those vendors have not been used for a significant period of time, such as after twenty-four (24) months.
 - The OIG further recommended that the Department of Procurement Services continues to confirm with the Illinois Secretary of State (ILSOS) whether vendor applicants are properly registered with the ILSOS to conduct business in the city, county, and State before the Department of Procurement Services has approved the application; and
 - Periodically confirms whether active vendors in the CCC vendor database remain registered with the ILSOS to conduct business in the city, county, and State after the Department of Procurement Services has approved a vendor; and, if no longer registered in good standing with the State conduct a vendor review and archive the vendor if needed.
5. The OIG recommended that the Department of Procurement Services, in conjunction with the Office of Information Technology, archives vendor account(s) for vendors with:
 - Multiple supplier accounts (duplicate) in the CCC PeopleSoft Finance database, as confirmed by the Department of Procurement Services as a duplicate.
 - Classifications of:
 - “Employee,” after the employee is terminated from CCC;
 - “Student,” after the student no longer attends CCC; and
 - “Retiree” and other vendors, after those vendors have not been used for a significant period of time, such as within the last twenty-four (24) months.
 - The OIG further recommended that the archiving of inactive vendor accounts occur within as short as time as practicable from the date of the OIG Investigative Summary.
6. The OIG recommended that the Department of Procurement Services consults with the Office of Information Technology to establish a process in which to record and flag individuals and

entities, such as the 268 individuals and entities identified by the OIG, that have been permanently debarred by other government agencies.

7. The OIG recommended that the Department of Procurement Services requests that the Office of Information Technology audits the PeopleSoft Finance database for active vendors without a corresponding Taxpayer Identification Number and match a Taxpayer Identification Number to the vendor and update the PeopleSoft Finance database accordingly, or otherwise archive the vendor.

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

OIG Case Numbers 20-0174 and 20-0179

The OIG conducted three investigations regarding a full-time faculty member assigned to a City College. Two of those three investigations resulted in sustained findings of waste, fraud and/or misconduct. The third investigation (OIG Case Number 21-0078) resulted with a report documenting not sustained findings of waste, fraud, and/or misconduct, but in which a recommendation was made.

Those investigations are summarized below.

- *OIG Case Number 20-0174*

The OIG received a complaint alleging that in addition to his full-time position at CCC, the full-time faculty member had a full-time position at a high school located in a south suburb of the Chicagoland area, contrary to the Local 1600 collective bargaining agreement and contrary to the CCC Outside Employment Policy. Based on this allegation, the OIG initiated an investigation.

During the course of the OIG investigation into the complaint alleging that the full-time faculty member engaged in outside employment, the OIG discovered that the full-time faculty member may not have been adhering to his scheduled CCC class times.

The OIG investigation regarding OIG case number 20-0174 revealed the following:

- The full-time faculty member failed to disclose information requested in a document that he provided to CCC, in that he failed to disclose an outside employer on Outside Employment Certification forms that he submitted in 2012, 2013, 2015, 2016,

2017, 2018, and 2019, which were regarding calendar years 2011, 2012, 2014, 2015, 2016, 2017, and 2018 in violation of Section IV(6) of the CCC District-Wide Employee Manual.

- The full-time faculty member falsely represented the quantity of work performed, in that on numerous days during the Spring 2021 term, he failed to be physically present at the City College for a significant portion of his class time despite reflecting on his Certificates of Attendance that he worked a regular work day on those days, in violation of Section IV(7) of the CCC District-Wide Employee Manual.
- The full-time faculty member was inattentive to his duty as a full-time faculty member, in that on numerous occasions during the Spring 2021 term, he failed to be physically present at the City College as required for a significant portion of his class time, in violation of Section IV(38) of the CCC District-Wide Employee Manual.
- The full-time faculty member failed to comply with CCC's Outside Employment Policy, 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, in that the full-time faculty member failed to disclose his outside employer on Outside Employment Certification forms that he submitted in 2012, 2013, 2015, 2016, 2017, 2018, and 2019, which were regarding calendar years 2011, 2012, 2014, 2015, 2016, 2017, and 2018.
- The full-time faculty member engaged in a full-time faculty position with CCC and worked in a concurrent full-time instructor position for a high school district located in a south suburb of the Chicagoland area since August 14, 2009, contrary to Article VIII, Section F of the *Agreement between the Board of Trustees and the Cook County College Teachers Union, Local 1600*.

- *OIG Case Number 20-0179*

The OIG obtained information that the full-time faculty member resides outside the City of Chicago in Crete, Illinois. Based on this information, the OIG initiated an investigation.

The OIG investigation regarding OIG case number 20-0179 revealed the following:

- The full-time faculty member resides outside the City of Chicago in Crete, 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 full-time faculty member falsified employment records, in that on his 2021 CCC Annual Certification of Residency online forms, he fraudulently affirmed that he resided in Chicago, Illinois, when in fact he resided in Crete, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

Additionally, based on the findings regarding OIG Case Numbers 20-0174 and 20-0179, the full-time faculty member engaged in conduct unbecoming a public employee, in violation of Section IV(50) of the CCC District-Wide Employee Manual.

Based on the OIG investigations of the outside employment and time and attendance issues (OIG Case Number 20-0174), in addition to the residency-related issue (OIG Case Number 20-0179), the OIG recommended that the full-time faculty member be terminated. The OIG further recommended that the full-time faculty member be designated ineligible to be re-hired and that his personnel records reflect this designation.

The full-time faculty member submitted his retirement from CCC, and he was subsequently designated ineligible to be re-hired.

- *OIG Case Number 21-0078*

The OIG conducted another investigation, under OIG Case Number 21-0078, regarding the full-time faculty member who was the subject of the investigations summarized above in OIG Case Numbers 20-0174 and 20-0179. The investigation regarding OIG Case Number 21-0078 was not sustained, and the OIG did not recommend any disciplinary action against the full-time faculty member. However, the OIG did make a policy recommendation in light of the investigation in OIG Case Number 21-0078. Because OIG Case Number 21-0078 was not sustained, but the OIG submitted an Investigative Summary with a policy recommendation, OIG Case Number 21-0078 will be documented in more detail in this *Bi-Annual Report* under the section titled *Report Submitted Documenting Not Sustained Findings with a Recommendation*.

Report Submitted Documenting Not Sustained Findings with a Recommendation

OIG Case Number 21-0078

The OIG received a complaint alleging that a full-time faculty member⁶ assigned to a City College engaged in preferential treatment as well as a conflict of interest in violation of the CCC Ethics Policy in that, as the department chairperson of an academic department of the City College, he granted permission for his nephew, a student enrolled in the same City College, to bypass certain prerequisite classes and enroll in a class. Based on this complaint, the OIG initiated an investigation.

The OIG investigation revealed that the full-time faculty member, as the department chairperson of the department, made the decision to allow the student to enroll in two classes despite the student not having completed the prerequisite courses. It should be noted that the OIG reviewed the CCC course history for the student, which revealed that the student was enrolled in the two classes. However, subsequently, the student was dropped from both courses, and the reason indicated was “NP,” which, as the OIG was informed, means nonpayment. As such, the student did not receive grades for the two classes.

The OIG did not conclusively find that the full-time faculty member had a familial relationship with the student pursuant to Article 5.2.2(s) of the CCC Ethics Policy. Therefore, the OIG did not find that the full-time faculty member’s decision to allow the student to enroll in the two classes, despite the student not having completed the prerequisite courses, was contrary to Article 5.2.10(1) of the CCC Ethics Policy.

The OIG did not conclusively find that the full-time faculty member gave preferential treatment to the student.

The OIG investigation revealed that there was no clear process for department chairpersons to recuse themselves from making decisions or participating in making decisions regarding a student with whom they have a familial relationship.

Based on the OIG investigation of the ethics related issue in OIG Case Number 21-0078, the OIG did not recommend any disciplinary action against the full-time faculty member. However, the OIG recommended that the Office of Academic and Student Affairs develops a District-Wide policy and process for department chairpersons to recuse themselves from making decisions or participating or

⁶ This full-time faculty member is the same full-time faculty member referenced previously in this *Bi-Annual Report* under OIG Case Numbers 20-0174 and 20-0179.

being involved in the making of decisions regarding a student with whom they have a familial relationship.

Annual Audit of the District's Compliance with the CCC Residency Policy

OIG Case Number 22-0060

Article 4.6(a) of the Board Policies and Procedures for Management & Government sets forth the CCC Residency Policy. Article 4.6(a), under the heading *Annual Certification of Residency*, provides that on February 1st of each year every full-time CCC employee will be required to certify their compliance with the residency policy. The employee's certification shall include an oath or affirmation that the employee is not required to be an actual resident because he/she falls within one of the exceptions to the requirement or that the employee is an actual resident of the City of Chicago. Additionally, Article 4.6(a) provides that "the Inspector General shall conduct an annual audit of the District's compliance with this Policy and shall submit a report of audit findings to the Board no later than the first regularly scheduled public meeting of the Board following July 1st of each year."

On June 29, 2022, the OIG submitted the 2022 Audit of Compliance with the District's Residency Policy.

On February 1, 2022, all full-time CCC employees were sent an email regarding the need to certify their Chicago residency for 2022 by completing the online *Annual Certification of Residency* form, with directions on how to complete the form online.

Subsequently, the Office of Human Resources provided the OIG with the results of all the responses received.

The great majority of the 1,942 full-time employees responded to the Annual Certification Process. Specifically, 1,908 (98%) full-time employees responded.

Of the 34 employees who did not respond, the OIG confirmed that eight (8) changed to terminated status, one (1) became a part-time employee during the certification period, 22 were on leaves of absence, and three (3) were on sabbatical leaves. Therefore, all the full-time employees who were active and working during the 2022 certification of residency process responded. The table below documents the responses received District-Wide, as confirmed by the OIG.

Response	Number	%
No response	0	0.00%
No response due to employee being terminated	8	0.41%
No response due to employee status change to part-time	1	0.05%
No response due to employee being on a leave of absence	22	1.13%
No response due to employee being on sabbatical	3	0.15%
1. Required to be a resident, with correct address	1866	96.09%
2. Not required to be a resident, with correct address	6	0.31%
3. Required to be a resident, with incorrect address	8	0.41%
4. Not required to be a resident, with incorrect address	1	0.05%
5. Required to be a resident, but does not currently live within the City of Chicago	27	1.39%
Total	1942	100.00%

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

- Regarding the 1,874 employees who responded that they were required to be a resident of the City of Chicago (1,874 is the total of Responses 1 and 3 in the table above):
 - As of June 25, 2022, the OIG had active investigations regarding 16 of these 1,874 full-time employees who represented that they were required to be a resident of the City of Chicago.
- Regarding the seven employees who responded that they were not required to be a resident of the City of Chicago (Seven is the total of Responses 2 and 4 in the table above):
 - Six of those employees fell within an exception to the CCC residency requirement.
 - Two of these six employees were hired before July 1, 1977.
 - Four of these six employees were exempt from the CCC residency requirement due to side letter agreements.
 - According to the Office of Human Resources, one of those employees should have been documented in CCC records as a part-time employee. Subsequently, CCC records were corrected to reflect that the individual is a part-time employee.
- Regarding the 27 employees who responded that they were required to be residents but did not currently reside within the City of Chicago (See Response 5 in the table above):
 - One of the 27 employee's employment status, subsequent to the certification period, changed from full-time to part-time status.
 - Two of the 27 employees' employment status, subsequent to the certification period, changed to terminated.

- Eight of the 27 employees were employed for less than six months or received approved extensions.
- Six of the 27 employees were employed for less than one year and subsequent to the certification period, changed their address in CCC records to a City of Chicago residential address.
- Ten of the 27 employees responded that they did not currently reside within the City of Chicago, despite the fact that CCC records indicated a City of Chicago residential address for the employee.
 - The OIG reviewed CCC personnel records and public records regarding these 10 employees. This review revealed that all ten of the employees appeared to reside in the City of Chicago, and they most likely checked the wrong box on the Annual Certification of Residency online form.