



CITY COLLEGES[®]
OF CHICAGO

JULY 1 – DECEMBER 31

2023

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

OFFICE OF THE INSPECTOR GENERAL BI-ANNUAL REPORT

LAMESHA SMITH
INSPECTOR GENERAL
CITY COLLEGES OF CHICAGO

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
Laritza Lopez, Trustee
Darrell A. Williams, Trustee
Yehuda Goldbloom, Student Trustee

From: Lamesha Smith, Inspector General

Date: February 21, 2024

RE: Office of the Inspector General *Bi-Annual Report* for the period of July 1, 2023 through December 31, 2023

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, 2023 through December 31, 2023. 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

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

Dispositions in Federal 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.

The following disposition subsequently took place during this reporting period:²

- Tiffany McQueen, the principal of a CCC vendor, was originally charged with two counts of wire fraud and one count of making a false statement to FBI agents. On April 11, 2023, Tiffany McQueen entered into a Plea Agreement with the Acting United States Attorney for the Northern District of Illinois. By the Plea Agreement, Tiffany McQueen agreed to enter a voluntary plea of guilty as to Count 10 of the indictment, which charged Tiffany McQueen with wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1346. Subsequently, the United States District Court of the Northern District of Illinois found Tiffany McQueen guilty of the offense of fraud by wire involving the right to honest services as to Count 10 of the indictment, specifically violating Title 18, United States Code, Sections 1343 and 1346. On September 26, 2023, Tiffany McQueen was

¹ Copies of the press release from the United States Attorney for the Northern District of Illinois and the indictment can be accessed here: [Northern District of Illinois | Federal Indictment Charges Former Vice Chancellor of City Colleges of Chicago with Devising Procurement Fraud Scheme | United States Department of Justice](#).

² The disposition regarding Sharod Gordon was detailed in the OIG *Bi-Annual Report* for the period of July 1, 2022 through December 31, 2022.

sentenced, and she was ordered to serve two years of probation and ordered to pay restitution in the amount of **\$35,000** to CCC.

Based on the admissions made by Tiffany McQueen as well as her subsequent federal criminal conviction for wire fraud, the OIG made a recommendation to CCC to initiate the process to permanently debar Tiffany McQueen and the vendor company from doing any future business with CCC. Tiffany McQueen's admissions and the OIG's recommendation are detailed later in this *Bi-Annual Report* in the "OIG Reports Submitted" section under OIG Case Number 17-0179.

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. Restitution payments that the OIG received for those two defendants are detailed in the *Bi-Annual Reports* covering the periods of January 1, 2021 through June 30, 2021, July 1, 2021 through December 31, 2021, January 1, 2022 through June 30, 2022, July 1, 2022 through December 31, 2022, as well as January 1, 2023 through June 30, 2023.

During the reporting period of July 1, 2023 through December 31, 2023, the OIG received an additional restitution payment. 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.³ 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 July 1, 2023 through December 31, 2023, the OIG received partial restitution payment checks totaling \$2,200.00 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 payment that the OIG received for Tiffany Capel during the reporting period of January 1, 2023 through June 30, 2023 is as follows:
 - In October 2023, the OIG received another partial restitution payment in the amount of \$2,000.00 via check for Tiffany Capel. Subsequently, the OIG provided the aforementioned

³ 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.

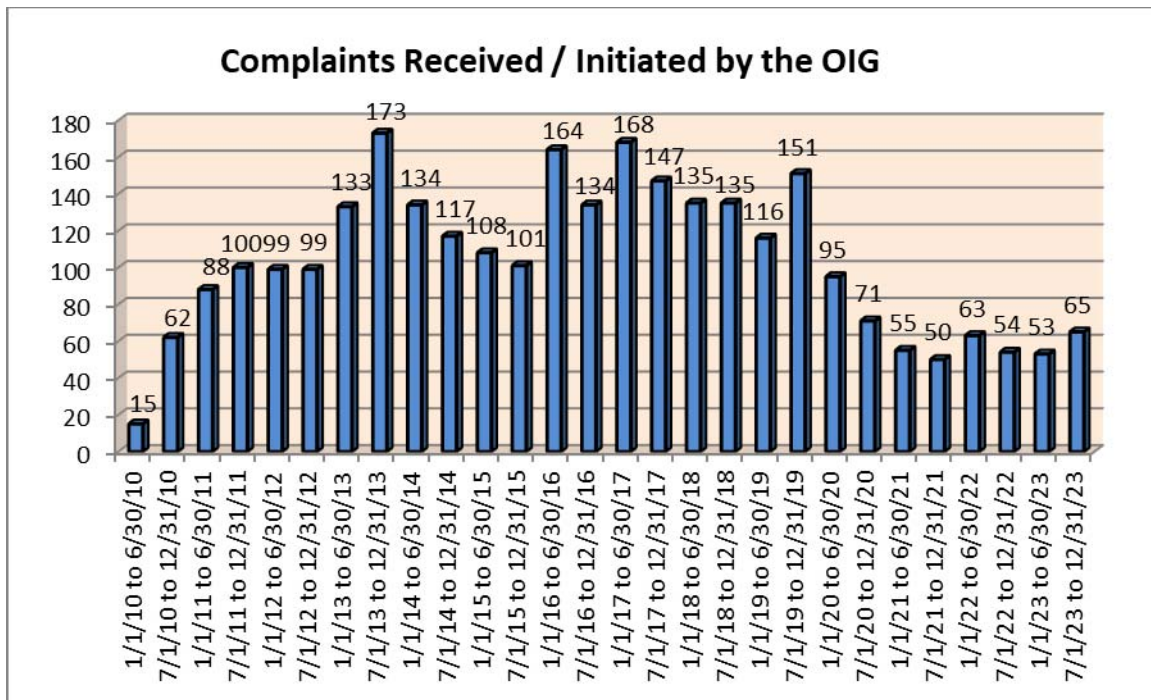
restitution check to the CCC Controller's Office for deposit into CCC's treasury.

- As of December 31, 2023, the OIG had received a total of \$4,200.00 of the \$15,000.00 in restitution that Tiffany Capel owes to CCC.

As of the date of this *Bi-Annual Report*, the final disposition regarding other defendants charged in this case are still pending.

Complaints Received

For the period of July 1, 2023 to December 31, 2023, the OIG received 65 complaints. These 65 complaints included complaints forwarded to the OIG from outside sources as well as investigations initiated based on the OIG's own initiative.⁴ The following table documents the complaints received by the OIG during the current and previous reporting periods.



The 65 complaints received represent a variety of subject matters. The following table documents the subject matters of the complaints received.

⁴ 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 July 1, 2023 to December 31, 2023		
Subject Matter (Allegation)	Number	Percentage
Retaliation	1	1.54%
Inattention to Duty	1	1.54%
Financial Aid Fraud	1	1.54%
Hostile Work Environment	1	1.54%
Physical Assault	1	1.54%
Sexual Abuse	1	1.54%
Violation of Drug Free Workforce Policy	1	1.54%
Drinking Alcohol During Working Hours	1	1.54%
Incompetence in Performance of Position	2	3.08%
Waste of Funds	2	3.08%
Violation of Outside Employment Policy	2	3.08%
Unknown	3	4.62%
Harassment	3	4.62%
Misappropriation of Funds	3	4.62%
Discourteous Treatment	4	6.15%
Falsification of Records	4	6.15%
Violation of Ethics Policy	5	7.69%
Preferential Treatment	5	7.69%
Theft	6	9.23%
Residency	8	12.31%
Falsification of Attendance Records	10	15.38%
Total	65	100%

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of June 30, 2023, the OIG had 68 pending complaints, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of July 1, 2023 through December 31, 2023, the OIG closed 69 complaints. The following chart categorizes the reasons that the OIG closed the 69 complaints during the current reporting period.

Complaints Closed Between July 1, 2023 through December 31, 2023		
Reason Closed	Number	Percentage
Sustained	1 ⁵	1.45%
Not Sustained / No Policy Violation	24	34.78%
Subject Already Disciplined	1	1.45%
Subject Inactive	4	5.80%
Duplicate Complaint	9	13.04%
Administratively Closed	2	2.90%
Complaint Included with Another Active Investigation	10	14.49%
Referred / Deferred	18	26.09%
Totals	69	100%

Regarding the complaints closed during the period of July 1, 2023 to December 31, 2023, 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, 2023 to June 30, 2023).⁶

Average Calendar Days to Close				
Reason Closed	1/1/23 to 6/30/23		7/1/23 to 12/31/23	
	Number	Average Calendar Days to Close	Number	Average Calendar Days to Close
Sustained	1	265	1	441
Completion of Board Mandated Audit	1	126	-	-
Not Sustained / No Policy Violation	19	526	24	349
Subject Already Disciplined	2	127	1	300
Subject Inactive	5	692	4	435
Duplicate Complaint	8	2	9	1
Administratively Closed	1	1,297	2	567
Complaint Included with an Active Investigation	3	3	10	1
Referred / Deferred	14	29	18	5
Totals	54		69	

⁵ As will be detailed later in this *Bi-Annual Report*, during the period of July 1, 2023 through December 31, 2023, the OIG issued two reports regarding sustained investigations. One of those reports was regarding OIG Case Number 17-0179. However, OIG Case Number 17-0179 remains an active investigation while the remaining defendants' criminal cases are pending. As such, this table reflects one closed case that was sustained instead of two.

⁶ 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.

As of December 31, 2023, the OIG had 64 pending complaints. Fourteen (14) of these 64 pending complaints (22%) were received between July 1, 2023 and December 31, 2023, and 16 of these 64 pending complaints (25%) were received between January 1, 2023 and June 30, 2023.

OIG Reports Submitted – July 1, 2023 through December 31, 2023

During the reporting period of July 1, 2023 to December 31, 2023, the OIG submitted two reports documenting sustained findings of waste, fraud and/or misconduct.⁷

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

OIG Case Number 17-0179

As noted earlier in this *Bi-Annual Report*, on November 19, 2019, as a result of an investigation initiated by the OIG and worked in partnership with the FBI and the Office of the United States Attorney for the Northern District of Illinois, a federal grand jury indicted three CCC employees and five vendors, including Tiffany McQueen, the principal of a CCC vendor, who was indicted for two counts of wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1346 as well as for one count of making a false statement to FBI agents, in violation of Title 18, United States Code, Section 1001(a)(2).

On April 11, 2023, Tiffany McQueen entered into a Plea Agreement with the Acting United States Attorney for the Northern District of Illinois. By the Plea Agreement, Tiffany McQueen agreed to enter a voluntary plea of guilty as to Count 10 of the indictment, which charged Tiffany McQueen with wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1346. Subsequently, the United States District Court of the Northern District of Illinois found Tiffany McQueen guilty of the offense of fraud by wire involving the right to honest services as to Count 10 of the indictment, specifically violating Title 18, United States Code, Sections 1343 and 1346. On September 26, 2023, Tiffany McQueen was sentenced, and she was ordered to serve two years of probation and ordered to pay restitution in the amount of **\$35,000** to CCC.

In the Plea Agreement, Tiffany McQueen made various admissions which serve as causes for debarment pursuant to the CCC Debarment Policy, as contained in Article 5.3 of the Board Policies and Procedures for Management and Government. These admissions included the following:

⁷ 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.

- Beginning in or around May 2015, and continuing to in or around June 2016, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, Tiffany McQueen, Sharod Gordon, and others known and unknown, knowingly devised, intended to devise, and participated in a scheme to defraud CCC of money and property, by means of materially false and fraudulent pretenses, representations, and promises, and by the concealment of material facts, and of the intangible right to the honest services of Sharod Gordon through kickbacks, in violation of Title 18, United States Code, Sections 1343 and 1346.
- Tiffany McQueen admitted that Sharod Gordon was employed by CCC as, among other positions, the Vice Chancellor of Legislative and Community Affairs. Tiffany McQueen admitted that Sharod Gordon's duties included, among other things, soliciting quotes from potential vendors to provide services to CCC, reviewing invoices from vendors, considering bids for contracts with CCC, and approving invoices in certain circumstances.
- Tiffany McQueen admitted that at times, she and Sharod Gordon were engaged in a romantic relationship.
- Tiffany McQueen admitted that as of May 2015, her professional experience did not involve community canvassing and flyer distribution services.
- Tiffany McQueen admitted that CCC policies and procedures prohibited its employees from making, or participating in the making of any decision, or taking any action with respect to any matter in which the employee had any special interest, unless the special interest was properly disclosed to CCC officials.
 - See, Article 5.2.10(1) of the CCC Ethics Policy.
- Tiffany McQueen admitted that CCC defined a "special interest" as including any economic or other personal interest that is in any way distinguishable from the interests of the public generally.
 - See, Article 5.2.2(ee) of the CCC Ethics Policy.
- Tiffany McQueen admitted that CCC policies prohibited employees from, among other things, engaging in an occupation or other activity that would result in a conflict of interest with their employment and in the misappropriation of funds.
 - See, Section IV(12) and Section IV(17) of the CCC District-Wide Employee Manual.
- Tiffany McQueen admitted that as part of the scheme to defraud, for the purpose of concealing that she and Sharod Gordon would personally benefit from payments on contracts awarded by CCC, she and Sharod Gordon prepared, submitted, and caused to be prepared and submitted, invoices to CCC in the name of the CCC vendor company that purportedly sought payments solely for the benefit of the CCC vendor company for community canvassing and flyer distribution

- services to be completed by the CCC vendor company, when in truth, a portion of those payments were intended for her and Sharod Gordon.
- This admission established that Tiffany McQueen engaged in conduct prohibited by Article 5.3.3(j)(9) of the Debarment Policy, in that she violated ethical standards established by the Board, or other dishonesty incident to obtaining and or performing any Board contract.
 - This admission established that Tiffany McQueen engaged in conduct prohibited by Article 5.3.3(i) of the Debarment Policy, in that she operated the CCC vendor company in a manner designed to evade the application or to defeat the purpose of this or any other Board Policy or any provision of any federal, state or local statute, ordinance, rule or regulation or any other applicable law, rule or regulation, specifically Article 5.2.10(1) of the CCC Ethics Policy.
 - This admission established that Tiffany McQueen engaged in conduct prohibited by 5.3.3(j)(18) of the Debarment Policy, in that she assisted Sharod Gordon in violating Article 5.2.10(1) of the CCC Ethics Policy.
- Tiffany McQueen admitted that on or about May 3, 2015, she organized and registered the CCC vendor company in the State of Illinois and listed herself as the sole registered agent of the CCC vendor company.
 - Tiffany McQueen admitted that on or about May 8, 2015, she opened a bank account for the CCC vendor company and listed herself as the account's sole signatory.
 - Tiffany McQueen admitted that on or about May 8, 2015, CCC received a vendor application form submitted on behalf of the CCC vendor company. The vendor form did not list Tiffany McQueen as the point of contact for the CCC vendor company. Rather, the form listed Individual E as the point of contact for the CCC vendor company, and the form identified Individual E as the "Principal" of the CCC vendor company. In truth, Individual E was Tiffany McQueen's mother, and Tiffany McQueen alone directed and controlled the CCC vendor company.
 - This admission established that Tiffany McQueen engaged in conduct prohibited by Article 5.3.3(d) of the Debarment Policy, in that she made or caused to be made a false, deceptive, or fraudulent statement in an application for Board or any government work.
 - Tiffany McQueen admitted that on or about May 20, 2015, CCC received an invoice submitted on behalf of the CCC vendor company, with Individual E rather than Tiffany McQueen listed as the point of contact for the CCC vendor company. This invoice sought a \$20,000 payment from CCC for community canvassing and flyer distribution

services that the CCC vendor company represented it would complete, or had completed, on behalf of CCC.

- Tiffany McQueen admitted that she understood that other employees at CCC were aware of her relationship with Sharod Gordon and also knew that her professional experience did not involve community canvassing and flyer distribution services. In order to conceal these facts, the CCC vendor application form, as well as subsequent invoices submitted on behalf of the CCC vendor company, concealed Tiffany McQueen's association with, and interest in, the CCC vendor company and instead listed Individual E as the point of contact for the CCC vendor company.
 - This admission established that Tiffany McQueen engaged in conduct prohibited by Article 5.3.3(d) of the Debarment Policy, in that she made or caused to be made a false, deceptive, or fraudulent material statement in an application for Board or any government work.
 - This admission established that Tiffany McQueen engaged in conduct prohibited by Article 5.3.3(j)(10) of the Debarment Policy, in that she engaged in dishonesty incident to applying, obtaining, and qualifying for a Board contract.
- Tiffany McQueen admitted that on or about May 21, 2015, she and Sharod Gordon, for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication in interstate commerce certain writings, signs, and signals, namely, data relating to the negotiation of a check, in the amount of approximately \$20,000 from an account at JP Morgan Chase Bank to another account at JP Morgan Chase Bank, which represented a payment by CCC for the invoice submitted in the name of the CCC vendor company dated May 20, 2015, and which wire communication was routed across state lines.
 - CCC PeopleSoft Finance records reflect this \$20,000 payment to the CCC vendor company, with a payment date of May 20, 2015.
- Tiffany McQueen admitted that after the CCC vendor company received this \$20,000 payment from CCC, beginning on or about June 15, 2015, and continuing until on or about December 2, 2015, she paid Sharod Gordon a total of approximately \$10,500 in kickbacks.
 - This admission established that Tiffany McQueen engaged in conduct prohibited by Article 5.3.3(j)(5) of the Debarment Policy, in that she engaged in bribery.
- Tiffany McQueen admitted that in addition, on or about June 3, 2016, CCC received a second invoice from the CCC vendor company, with Individual E rather than Tiffany McQueen again listed as the point of contact for the CCC vendor company. This invoice sought a \$15,000 payment from CCC for community canvassing and flyer distribution services that the CCC vendor company represented it would complete,

or had completed, on behalf of CCC. In response to the June 3, 2016 invoice, on or about June 8, 2016, CCC paid the CCC vendor company \$15,000. Tiffany McQueen admitted that on or about June 20, 2016, she paid Sharod Gordon approximately \$10,000 in kickbacks. This money derived from the \$15,000 payment that the CCC vendor company received from CCC.

- This admission established that Tiffany McQueen engaged in conduct prohibited by Article 5.3.3(j)(5) of the Debarment Policy, in that she engaged in bribery.
 - CCC PeopleSoft Finance records reflect this \$15,000 payment to the CCC vendor company, with an invoice date of June 2, 2016 and a payment date of June 8, 2016.
- Tiffany McQueen admitted that on or about June 26, 2018, she was interviewed by agents with the FBI about potential violations of federal criminal law by her and Sharod Gordon. Tiffany McQueen admitted that during that interview, she falsely stated in substance that she was not familiar with Individual E when, in fact, she knew who Individual E was because Individual E was Tiffany McQueen's mother.

Based on the admissions made by Tiffany McQueen as well as her subsequent federal criminal conviction for wire fraud, it was clear that Tiffany McQueen, as the principal and sole proprietor of the CCC vendor company, engaged in various acts which served as causes for debarment pursuant to the Debarment Policy. Moreover, since Tiffany McQueen's conduct occurred in connection with her performance of duties for or on behalf of the CCC vendor company, her conduct should be imputed to the CCC vendor company. Thus, the OIG recommended that CCC initiates the process to permanently debar Tiffany McQueen and the CCC vendor company from doing any future business with CCC pursuant to the CCC Debarment Policy of Article 5.3 *et seq.* of the Board Policies and Procedures for Management and Government.⁸

Subsequently, on November 20, 2023, the vice chancellor for Business and Procurement Services responded to the OIG report and indicated the following: "I am in agreement with the Inspector General recommendation to permanently debar Tiffany McQueen and (the CCC vendor company). I will begin the debarment process as outlined in Sections 5.3-5.3.11 of the Board Policies and Procedures."

⁸ OIG Case Number 17-0179 remains an active investigation while the other defendants' criminal cases are pending. As such, the table on page 6 of this report reflects one closed case that was sustained instead of two.

OIG Case Number 23-0023

The OIG received a complaint alleging that a director assigned to a City College resided outside the City of Chicago. The OIG investigation revealed that the director resided in Country Club Hills, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual.

The OIG investigation further revealed that the director falsified employment records, in that he fraudulently affirmed on CCC residency certification forms that he resided in Chicago, Illinois, when in fact he resided in Country Club Hills, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

During the course of the investigation under OIG Case Number 23-0023, the OIG received a complaint alleging that the director may have been falsifying his time in that he had been observed coming to work late and leaving early. Based on this complaint, the OIG initiated an investigation under OIG Case Number 23-0060. The OIG conducted this additional investigation of the director, specifically regarding his time and attendance. However, the OIG made no finding regarding OIG Case Number 23-0060 because the OIG investigation later revealed that the director had since been disciplined for issues regarding his job performance, including his time and attendance. As such, the OIG closed OIG Case Number 23-0060.

Based on the investigation under OIG Case Number 23-0023, the OIG recommended that the director be terminated. The OIG further recommended that the director be designated ineligible to be re-hired and that his personnel records reflect this designation.

Subsequently, the director's employment with CCC was terminated, and he was designated as ineligible to be re-hired.