Office of the Inspector General
City Colleges of Chicago

Office of the Inspector General
Bi-Annual Report
July 1, 2017 – December 31, 2017

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

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CITY COLLEGES of CHICAGO
Education that Works

To: Juan Salgado, Chancellor
Dr. Walter E. Massey, Chair of the Board of Trustees
Elizabeth Swanson, Vice-Chairperson of the Board of Trustees
Clarisol Duque, Secretary of the Board of Trustees
Rev. Dr. Darrell Griffin, Trustee
Karen Kent, Trustee
Marisela Lawson, Trustee
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From: John A. Gasiorowski, Inspector General

Date: February 8, 2018

RE: Office of the Inspector General ("OIG") *Bi-Annual Report* for the period of July 1, 2017 through December 31, 2017

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, 2017 through December 31, 2017. 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 - *Certified Inspector General Investigator* designation

From August 14, 2017 to August 18, 2017, an OIG investigator attended the Association of Inspectors General Summer Institute held in New York City. The Association of Inspectors General is an organization of state, local, and federal inspectors general and their staffs.[1] As a result of attending the week-long training institute, as well as successfully passing a comprehensive examination on the final day, the OIG investigator was awarded the designation of *Certified Inspector General Investigator* by the Association. This investigator joins four other current members of the OIG who previously earned the designations of *Certified Inspector General* or *Certified Inspector General Investigator*.

[1] It should be noted that due to CCC budget restrictions, the investigator paid for his own travel and accommodations in order to attend the week-long training institute in New York City. The OIG paid the tuition for the institute.

Updates to Investigations Documented in Previous Bi-Annual Reports

Updates regarding disciplinary recommendations made during the January 1, 2017 to June 30, 2017 reporting period

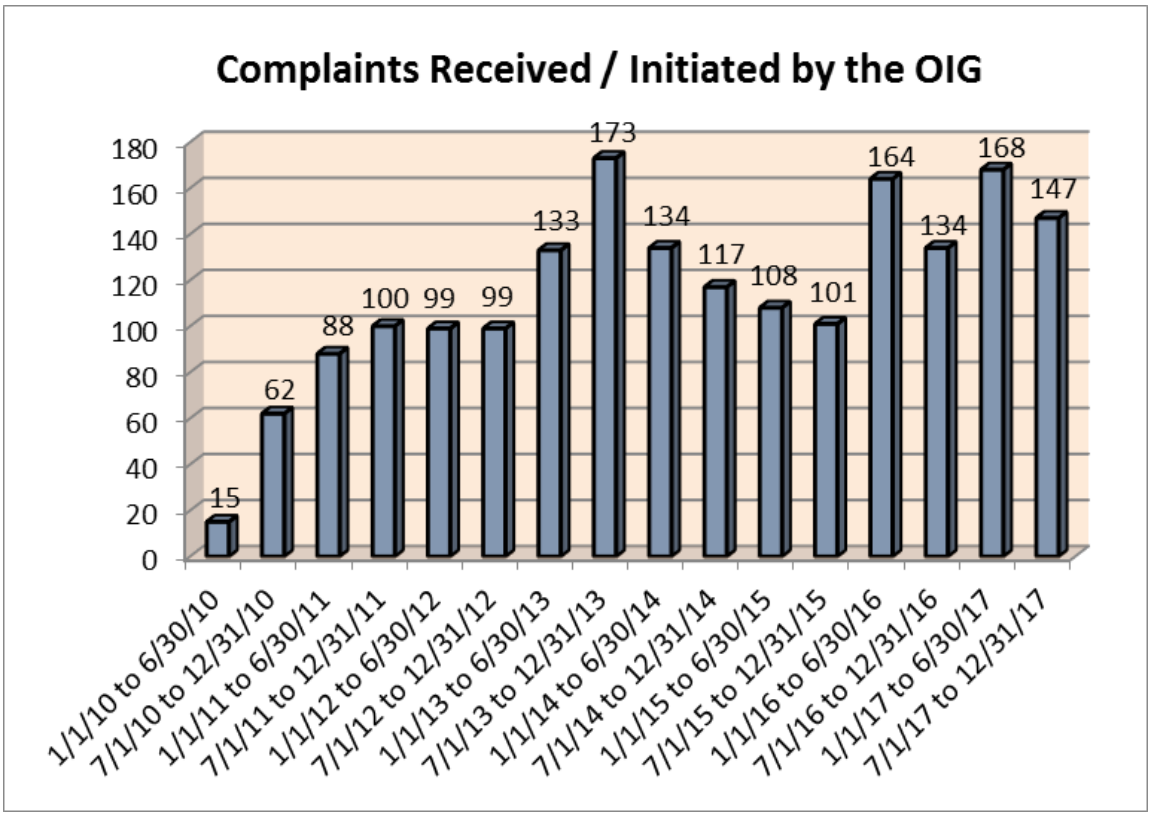
In the *Bi-Annual Report* submitted for the January 1, 2017 to June 30, 2017 reporting period, the OIG submitted 11 reports documenting investigations which resulted in sustained findings of waste, fraud and misconduct, resulting in 19 recommendations of disciplinary action. At the time the *Bi-Annual Report* was submitted, disciplinary action was pending regarding several of the investigations. The following table updates disciplinary actions recommended by the OIG regarding the CCC employees/vendors as well as the actions taken by CCC.

Disciplinary Action Updates from Investigations Reported On In Previous Bi-Annual Report (January 1, 2017 to June 30, 2017)

Case Number	Subject	Recommended Action	Action Taken
14-0127	Vendor	Debar	1 Year Voluntary Exclusion (effective 6/1/17)
14-0127	Vendor President	Debar	1 Year Voluntary Exclusion (effective 6/1/17)
14-0127	Vendor Employee	Debar	1 Year Voluntary Exclusion (effective 6/1/17)
16-0061	Janitor	Termination / DNRH	
16-0103	Full-Time Faculty	Appropriate Discipline	Written Warning
16-0110	Director of Revenue Development	Termination / DNRH	
16-0207	Full-Time Faculty	Appropriate Discipline	Previously demoted for same conduct
17-0016	Director of Financial Aid	Termination / DNRH	
17-0142	Vendor	Debar	Two Year Debarment (effective 9/1/2017)
17-0153	Associate Vice Chancellor	Appropriate Discipline	Termination / DNRH
17-0166		Appropriate Discipline	
17-0180	Security Assistant (part-time)	Appropriate Discipline	Oral Warning
17-0180	Security Officer (part-time)	Termination / DNRH	
17-0199	Vendor	Debar	2 Year Debarment (effective 9/19/2017)
17-0199	Vendor representative	Debar	2 Year Debarment (effective 9/19/2017)
17-0199	Vendor	Debar	Permanent Debarment (effective 9/19/2017)
17-0199	Vendor representative	Debar	Permanent Debarment (effective 9/19/2017)
17-0199	Vendor representative	Debar	Permanent Debarment (effective 9/19/2017)
17-0220	Vendor	Debar	Pending
17-0220	Vendor representative	Debar	Pending

Complaints Received

For the period of July 1, 2017 through December 31, 2017, the OIG received 147 complaints. These 147 complaints included complaints forwarded to the OIG from outside sources as well as investigations (or audits/reviews) initiated by the OIG.[2] For purposes of comparison, the following table documents the complaints received by the OIG during the current and previous reporting periods.



The 147 complaints received represent a variety of subject matters. The table to follow documents the subject matters of the complaints received.

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

Subject Matters of Complaints Received from July 1, 2017 to December 31, 2017		
Subject Matter (Allegation)	**Number**	**Percentage**
OIG initiated reviews	2	1.36%
Use of CCC property for unauthorized purposes	2	1.36%
Violation of Outside Employment Policy	2	1.36%
Engaging in conduct in violation of the Illinois Compiled Statutes	3	2.04%
Conduct unbecoming a public employee	3	2.04%
Violation of one's collective bargaining agreement	3	2.04%
Discourteous Treatment	5	3.40%
Incompetence in the performance of the position	6	4.08%
Giving Preferential Treatment	6	4.08%
Fraud (including financial aid or tuition)	7	4.76%
Misappropriation of Funds / Theft	8	5.44%
Violation of CCC Ethics Policy	8	5.44%
Violation of miscellaneous CCC Policies	10	6.80%
Residency	12	8.16%
Sexual or other harassment / Discrimination / Retaliation	19	12.93%
Falsification of Attendance Records	21	14.29%
Inattention to Duty	30	20.41%
Totals	**147**	**100.00%**

Status of Complaints

As reported in the previous *Bi-Annual Report*, as of June 30, 2017, the OIG had 103 complaints that were pending, meaning that the OIG was in the process of conducting investigations regarding these complaints. During the period of July 1, 2017 through December 31, 2017, the OIG closed 158 complaints. These complaints were closed for a variety of reasons, including: the complaint was sustained following an investigation and a report was submitted; a review was completed and recommendations were made; the complaint was not sustained following an investigation or no policy violation was found; the complaint was referred to the appropriate CCC department; the subject of the complaint retired or resigned from CCC employment prior to or during the course of the investigation; the complaint was a duplicate of a complaint previously received; and other reasons. The following chart categorizes the reasons that the OIG closed the 158 complaints during the subject reporting period.

Complaints Closed Between July 1, 2017 and December 31, 2017		
Reason Closed	**Number**	**%**
Sustained	14	8.86%
Review with recommendations	1	0.63%
Not Sustained / No Policy Violation	51	32.28%
Referred / Deferred	49	31.01%
Subject Inactive	14	8.86%
Duplicate Complaint	14	8.86%
Complaint included with another active investigation	11	6.96%
Other	4	2.53%
Totals	**158**	

Regarding the complaints closed during the period of July 1, 2017 to December 31, 2017, the table below documents the number of calendar days between the date that the complaint was received and the date that the complaint was closed as compared to the average number of calendar days between the date that complaints were received and the date that complaints were closed for the complaints closed during the previous reporting period (January 1, 2017 through June 30, 2017).[3]

Average Calendar Days to Close a Complaint				
Reason Closed	**1/1/17 to 6/30/17**		**7/1/17 to 12/31/17**	
	Number	**Average Calendar Days to Close**	**Number**	**Average Calendar Days to Close**
Sustained	11	272	14	153
Review with Recommendations	3	424	1	78
Not Sustained / No Policy Violation	70	246	51	236
Not Sustained with Recommendations	1	25	0	0
Referred / Deferred	47	1	49	1
Other	28	88	43	56
Totals	**160**		**158**	

As of December 31, 2017, the OIG had 92 pending complaints. Forty-seven of these 92 pending complaints (51%) were received between July 1, 2017 and December 31, 2017, and 24 of these 92 pending complaints (26%) were received between January 1, 2017 and June 30, 2017.

[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 by the Inspector General. In situations where a complaint is sustained, the complaint is not considered closed until the Investigative Summary documenting the investigation is prepared and submitted pursuant to Article 2.7.3 of the Board Bylaws.

OIG Reports Submitted – July 1, 2017 through December 31, 2017

During the reporting period of July 1, 2017 through December 31, 2017, the OIG submitted 16 reports.[4] These 16 reports included one report documenting an OIG review and 15 reports documenting sustained findings of waste, fraud and/or misconduct.

Reports Submitted Documenting OIG Reviews

OIG Case Number 17-0270

The OIG received a complaint from the president of one of the City Colleges alleging that possibly over a ten-year period, ninety percent of Southern Illinois University funds paid for Illinois Nurse Assistant/Aide Competency Evaluation ("INACE") exams proctored at the City College were paid directly to the CCC-employed proctors instead of to the City College, which ultimately only received ten percent of the funds paid. Based on this complaint, the OIG initiated a review of the administration of the INACE exam at the four City Colleges which proctored such exams.

The OIG review revealed the following:

- During the period of January 2015 through May 2017, more than 5,000 students took the INACE exam at one of four CCC facilities. At the rate of $10 per student, the Southern Illinois University INACE Program paid more than $50,000 for proctoring services provided at CCC for this exam.

    - Regarding City College 1 (the City College from which the initial complaint was generated), the fees paid by the Southern Illinois University INACE Program were split with 90% of the fees paid to the coordinator/proctors of each exam and 10% of the fees paid to the college. The OIG investigation did not reveal that the 90%/10% fee split was a result of any fraudulent or otherwise nefarious conduct. Rather, but possibly no less problematic, it appears that City College 1 administrators continually signed off on the 90%/10% fee split without any thought behind it. In fact, during her interview with the OIG, the interim vice president of academic and student affairs who signed two letters confirming the 90%/10% fee split, stated that she merely copied a previous letter and had no knowledge of the proctors getting 90% of the payment. The interim vice president of academic and student affairs stated that when she copied the language, she was not paying attention. The exams were not administered through City College 1's Testing Center.

[4] 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.

- Regarding City College 2, 100% of the fees paid by the Southern Illinois University INACE Program were paid to the coordinator/proctors of each exam. The exams were not administered through City College 2's Testing Center.

- Regarding City College 3, the fees paid by the Southern Illinois University INACE Program were divided between the coordinator ($200) and the proctors ($100 each) of the exam, and the remaining fees were paid to the college. On numerous occasions, the coordinator and the proctors also received their regular CCC pay when administering the exams.

- Regarding City College 4, the fees paid by the Southern Illinois University INACE Program were received and maintained by City College 4. The Testing Center employees were paid their regular City Colleges of Chicago hourly rates by City College 4 to administer the exam.

- City College 1, City College 2, and City College 3 failed to process the payments received from the Southern Illinois University INACE Program to administer the INACE exams through their respective Business Offices.

- Each of the four City Colleges administering the INACE exams on behalf of the Southern Illinois University INACE Program failed to notify the Board of Trustees of the funds received.

Based on the OIG investigation, the OIG recommended the following:

1. The OIG recommended that the Department of Academic Affairs develops District-Wide policies and procedures outlining the manner in which CCC should administer the proctoring of the INACE exams. The OIG further recommended that the development of such policies and procedures take into account and/or include, at the very least, the following:

    a. In order to maintain consistency with the Board Policies and Procedures for Management and Government regarding the collection of fees at a City College and to account for and otherwise allow for audits of all funds received by a City College, all payments made by the Southern Illinois University INACE Program for proctoring services provided by a City College should be deposited with the given college's Business Office.

    b. As the Testing Center serves as a control to best ensure the integrity of exams administered at a given college, the Testing Center at each college should be utilized to administer INACE exams and all testing protocols should be followed.

    c. All payments made to coordinators and proctors for proctoring services should be made through CCC payroll. The amounts paid for the services

provided by coordinators and proctors should be set at rates consistent with the hourly rates paid to Testing Center coordinators/proctors or be set at the individual's regular pay rate.

d. The agreements made with and the payments received from Southern Illinois University INACE Program by the given City College should be disclosed to the Board via an entry on the appropriate Board Report consistent with Article 3.3 of the Board Policies and Procedures for Management and Government.

e. The operational costs of administering the INACE exam at a given college should be taken into account.

2. Based on the fact that on various occasions, the coordinator and proctors at City College 3 received both their regular CCC hourly pay and a portion of the funds received from the Southern Illinois University INACE Program when administering the INACE exams, the OIG recommended that CCC uses all legal but fiscally responsible means to recoup a total of $1,877.98 from eight employees.

Through salary deductions, at total of $1,305.96 was recouped from the three employees who were still active.

In an email, the Provost responded as follows:

"Upon review of the OIG report on INACE testing at (the four City Colleges), the following determinations have been made:

(City College 3) will take all legal but fiscally responsible steps to recoup pay from employees who received regular CCC pay while also receiving outside pay for coordinating/proctoring the INACE exam. The four individuals who are current CCC employees will fill out payroll deduction forms; City College 3's Payroll will work with the CCC legal team to recoup funds from former employees no longer with CCC.

At all sites where INACE exams are administered, business processes will be brought into alignment with existing policy and procedure, namely:

- All payments made by SIU to the colleges will be processed through the respective Business Offices.
- Exams will be proctored through the colleges' respective Testing Centers.
- Staff will be compensated for additional work hours through existing payroll processes; additional pay will be granted only when INACE exams are administered outside of regular work hours.

- Surplus revenues remaining after appropriate staff compensation has been made will remain with the colleges to cover overhead expenses.
- The College Presidents will disclose to the Board their contractual arrangements with SIU per Article 3.3 of the Board Policies and Procedures for Management and Government.

The recommendations of the OIG report can be met within existing policy; no new policies are needed."

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

Pursuant to the provisions of Article 2.7.5 of the Board Bylaws, the following are summaries of the OIG investigations for which reports were submitted documenting sustained findings of waste, fraud or misconduct during the period of July 1, 2017 through December 31, 2017.

OIG Case Number 17-0118

The OIG received a complaint that a coordinator-laboratories (coordinator) at a City College falsified her attendance records by arriving at work well after her scheduled start time and having someone swipe her in for an earlier time. It was further alleged that a clinical coordinator assigned to the same City College sometimes swiped the coordinator in. Shortly thereafter, the OIG received a second complaint regarding the clinical coordinator. This complaint alleged that the clinical coordinator had a second job and started her class late and kept her students late to accommodate her outside employment schedule. The complaints were consolidated under OIG Case Number 17-0118, and an investigation was initiated. The findings and recommendations regarding the two employees were documented in separate Investigative Summaries.

- Investigation of the coordinator

  The OIG investigation regarding the coordinator revealed that the coordinator was tardy between 117 and 140 occasions during 2016. More significantly, the OIG investigation revealed that on at least sixteen occasions during 2016, the coordinator failed to show for work, but she represented that she worked a full day on those occasions. At the coordinator's rate of pay, the sixteen days had a value of $2,793.48. The coordinator's actions violated Section IV, Paragraphs 3, 4, 7, 11, 17, and 38 of the CCC District-Wide Manual

  Based on the investigation, the OIG recommended the following:

1. The OIG recommended that the coordinator be terminated. The OIG further recommended that the coordinator be designated ineligible to be re-hired and that her personnel records reflect this designation.

2. The OIG recommended that CCC uses all legal and fiscally responsible remedies to recoup $2,793.48 from the coordinator on account of pay received from the sixteen days on which she falsified her attendance records to indicate that she worked when she did not.

The coordinator subsequently resigned from her CCC position, and she was designated ineligible to be re-hired. Additionally, through salary deductions, $2,793.48 was recouped from the coordinator prior to the date that her resignation was effective.

- Investigation of the clinical coordinator

The OIG investigation regarding the clinical coordinator, who also served as an adjunct faculty member, revealed that during at least the Spring 2016 term, the Fall 2016 term and parts of the Spring 2017 term, she received pay as a clinical coordinator and as an adjunct faculty member for the same hours. Additionally, the OIG investigation revealed that during the Spring 2016 term, she submitted time sheets and received pay for a course that she did not in fact teach. In all, the OIG investigation revealed that the clinical coordinator received $7,498.25 in pay to which she was not entitled.

Based on the investigation, the OIG recommended the following:

1. The OIG recommended that the clinical coordinator be terminated. The OIG further recommended that the clinical coordinator be designated ineligible to be re-hired and that her personnel records reflect this designation.

2. The OIG further recommended that CCC uses all legal and fiscally responsible remedies to recoup $7,498.25 from the clinical coordinator on account of $4,398.25 of pay she received for 171 hours and 55 minutes of work in her part-time role that she could not have completed because she was obligated to teach classes at the same time and on account of $3,100 of pay she received to teach a class that she did not teach.

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

OIG Case Number 17-0295

The OIG received two complaints alleging that a manager assigned to the District Office engaged in activities for a store that she owned while she was on duty for CCC. During the course of the investigation, the OIG reviewed usage records of the manager's CCC desk telephone, her e-mail account, and her desktop computer, for a seven-month period in 2017. The OIG investigation revealed that while on duty with CCC, the manager routinely spent significant time engaging in activities for her personal outside employment with the store and other personal non-CCC-related purposes. The manager's activities violated Section IV, Paragraphs 7, 11, 19, 30, 38, 42, and 45 of the CCC District-Wide Employee Manual, as well as the CCC Outside Employment Policy, the Policies and Guidelines Governing the Use of Computing and Technology Resources, and the Responsible Computer Use Policy.

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

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

OIG Case Number 17-0189

The OIG received a complaint that a computer lab manager assigned to a City College was inappropriately leaving his work site while on duty. The OIG investigation, which covered the period of August 1, 2017 to October 11, 2017, revealed the following:

- The computer lab manager routinely arrived at the City College well after his scheduled start time of 2:00 p.m. In fact, during the period of the review, the computer lab manager arrived at the City College after his scheduled start time almost 83% of the time.
- On various occasions, the computer lab manager left the City College campus for non-CCC-related reasons while on duty. On two of the days that the OIG conducted physical surveillance, the computer lab manager left the City College campus while on duty to go to restaurants that he owns.
- On at least two occasions, the computer lab manager, by his own admission, remotely clocked in as if he was at work when in fact he was not and received a full day's pay.
- On various occasions, the computer lab manager failed to work a full 7.5-hour day.
- The computer lab manager, by his own admission, worked at his restaurants when he used sick time from CCC. In fact, on

one occasion when the OIG conducted a physical surveillance, the computer lab manager spent time during his scheduled work hours at both of his restaurants. Regarding that day, the computer lab manager subsequently took a sick day.
- The computer lab manager used CCC computer equipment and resources to conduct restaurant-related activities.
- The computer lab manager engaged in outside employment that interfered with his CCC duties.
- The computer lab manager engaged in a lack of safe computing practices, in that he failed to safeguard the user names and passwords of other employees of the City College.

The computer lab manager's actions violated various CCC polices, including Section IV, Paragraphs 2, 4, 7, 11, 13, 17, 30, 38, 42, and 50 of the District-Wide Employee Manual. Additionally, the computer lab manager also acted contrary to the Responsible Computer Use Policy found in Article 6.6 of the Board Policies and Procedures for Management and Government.

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

Prior to his pre-disciplinary hearing, the computer lab manager resigned from his position, and he was designated ineligible to be re-hired.

OIG Case Number 17-0218

The OIG received a complaint that a part-time tutor assigned to a City College, who also served as a lecturer at the college, was falsifying her attendance records. The OIG investigation revealed that during the period of January 2017 into June 2017:

- On at least twelve occasions while on duty as a tutor, the employee left the City College for an extended period of time before returning without accounting for such time in her time and attendance records.
- On various other occasions while on duty as a tutor, the employee left the City College for shorter periods of time before returning without accounting for such time in her time and attendance records.
- On various occasions in her role as a tutor, the employee submitted requests to override her swipe times and fraudulently represented hours in these requests that she did not in fact work.
- On various occasions in her role as a tutor, the employee fraudulently documented hours on a departmental sign-in sheet that she did not in fact work.

- In her role as an instructor, the employee routinely failed to be present at the City College during her scheduled office hours.
- On various occasions, the employee worked as a substitute instructor during times that overlapped with her tutor hours, and she received pay for both positions for the same hours.

The employee's actions, as listed above, violated Section IV, Paragraphs 2, 7, 11, 37, 38, and 50 of the CCC District-Wide Employee Manual.

Additionally, the employee also failed to perform her duties and responsibilities as set forth in Article XII of the *Agreement Between the Board of Trustees of Community College District No. 508 and the City Colleges Contingent Labor Organization Committee IEA-NEA*, in that on various occasions, the employee failed to commence classroom instruction at the scheduled meeting time and end instruction at the scheduled meeting time, contrary to Article XII(C); and the employee failed to schedule and be present for one hour of student conference time per week for every course section that she taught for the Spring 2017 term, contrary to Article XII(F).

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

As of the date of this Bi-Annual Report, the disciplinary process regarding the employee was pending.

<u>OIG Case Number 17-0202</u>

The OIG received a complaint that a security officer assigned to a City College falsified his employment records in that he represented that he was an active sworn peace officer, when in fact he was not. The OIG investigation revealed that the security officer, on various occasions during his time as a CCC security officer, misrepresented his status as a sworn officer. Such misrepresentations caused him to be misclassified as a security officer, when in fact at most he should have been classified as a security assistant. As a result of his misrepresentations, the security officer was paid at least $13,033.01 in wages to which he was not entitled to receive. The security officer's actions violated Section IV, Paragraphs 6, 17, 37, and 50 of the CCC District-Wide Employee Manual.

It should be noted that the security officer resigned from his position with CCC subsequent to being notified by the OIG that his presence was requested for an interview regarding his CCC employment application and credentials.

Based on the investigation, the OIG recommended the following:

1. Being that the security officer resigned from his position with CCC, and based on the OIG investigation, the OIG recommended that the security officer be designated ineligible to be re-hired and that his personnel records reflect this designation.

2. The OIG recommended that CCC uses all legal and fiscally responsible remedies to recoup the minimum of $13,033.01 in wages that the security officer wrongfully received by way of fraudulently misrepresenting his credentials to CCC.

3. The OIG recommended that the Department of Safety and Security implements a standardized, annual process in which each Department of Safety and Security member certifies: a) the law enforcement or correctional agency that currently employs or formerly employed the member, if applicable; b) the member's status with the law enforcement or correctional agency that employs or employed the member; c) whether the member was the subject of disciplinary action by that agency in the past year; and d) the member's Illinois Retired Officer Concealed Carry status.

The security officer was subsequently designated ineligible to be re-hired.

In an October 2, 2017 letter, the Vice Chancellor of Safety and Security indicated that she will be working with the Office of the General Counsel and Office of Information Technology to implement yearly certification for Safety and Security personnel.

OIG Case Number 18-0022

The OIG received a complaint that a computer utilized by security officers at a City College accessed pornographic images. The OIG investigation revealed that a part-time security officer used the CCC computer to retrieve numerous pornographic images. The security officer's actions were contrary to the Policies and Guidelines Governing the Use of Computing and Technology Resources, which in turn is a violation of Section IV(45) of the CCC District-Wide Employee Manual.

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

The security officer subsequently resigned, and he was designated ineligible to be re-hired.

Additionally, as a result of this investigation and another contemporaneous OIG investigation regarding a computer use-related incident at the same City College, the OIG recommended the following:

1. The Department of Safety and Security uses a global username and password to access the computers used by Department of Safety and Security staff to view security camera video, write reports, and submit timesheets. In order to have an auditable trail of access to/use of such computers, the Office of Information Technology should take appropriate measures to require Department of Safety and Security staff to utilize their own individually assigned usernames and passwords to access such computers.

2. The Office of Information Technology should perform a review of the other CCC campuses to determine whether global usernames and passwords are similarly utilized by Department of Safety and Security staff (or any other staff) at those campuses. If such similar practices take place at another campus, appropriate measures should be taken to require access only via individually assigned usernames and passwords.

3. The Department of Safety and Security at the various colleges in conjunction with the Office of Information Technology should perform a review to identify all installed security video cameras that are not currently working and arrange for those cameras to be repaired.

OIG Case Number 18-0053

During the course of an unrelated investigation, the OIG learned that a full-time faculty member may have been paid for teaching a class that she did not in fact teach. Based on this information, the OIG initiated an investigation. The OIG investigation revealed that for the Summer 2016 term, two CCC students were awarded full $2,000 scholarships to participate in an ecology-related program at a downtown museum and receive CCC credit. All curricula, instruction and other activities regarding the program were designed and performed by museum staff. Nonetheless, the full-time faculty member was compensated $7,573.80 essentially as CCC's point of contact for the program. The OIG investigation revealed that the full-time faculty member's principal, if only, responsibility was to input the grades of the students enrolled in the program. At the very least, such excessive compensation was a waste of CCC funds, in violation of Section IV(37) of the CCC District-Wide Employee Manual.

As the then vice president of academic and student affairs at a City College who approved Request for Payment regarding the full-time faculty member resigned from her CCC position well prior to the completion of the OIG investigation, the OIG did not make any recommendations regarding disciplinary action.

Based on the findings of the investigation, the OIG recommended the following:

1. The OIG recommended that CCC reviews the compensation paid to the full-time faculty member for her responsibilities regarding the program

during the Summer 2016 term and determine the appropriate compensation for such responsibilities. When such appropriate compensation is determined, the OIG recommended that CCC uses all legal but fiscally responsible means to recoup the excess funds paid to the full-time faculty member.

2. The OIG recommended that the Office of Academic and Student Affairs develops and implements policies and procedures regarding CCC extension courses, such as the program at hand, so that relevant collective bargaining agreements are followed but employees do not receive undeserved financial windfalls at CCC's expense. Such policies and procedures should include, but not be limited to, the following:

    a. The position(s) responsible for monitoring the students' participation and progress, as well as acting as the students' and the program's CCC contact person.

    b. The position(s) responsible for inputting the students' grades into the CCC Campus Solutions system.

    c. A process to determine whether any additional compensation is required to be and/or should be paid for performance of such responsibilities, and the amount of such additional compensation.

In response to the OIG's recommendations, on February 2, 2018, the Provost wrote that "the (Office of Academic and Student Affairs) agrees with the recommendations and will work on developing and implementing appropriate policies and procedures. This will include identifying a process to determine whether staff members at any external, lab, or clinical sites can be entered as a Person of Interest (POI) in the CCC student information system (CS9) and serve as the office instructor of record. This case raises the larger issue of independent study, for which CCC does not have a policy or compensation plan. The (Office of Academic and Student Affairs) is already in contact with (the Office of Human Resources) to begin developing the policy and the appropriate compensation. We will also work with the relevant bargaining units on these questions of compensation."

<u>OIG Case Number 17-0078</u>

The OIG received a complaint alleging that a City College approved the purchase of equipment through a CCC vendor ("the vendor") from a non-CCC vendor ("supplier 1") for $24,348.54, despite the fact that these items were not part of the vendor's contract with CCC. The OIG investigation revealed the following:

- In 2016, the City College made at least three purchases through the vendor for items which were not part of the contract between the vendor

and CCC. These purchases were made from suppliers that were not CCC vendors. These purchases were as follows:
  - Cooking pans and a gelato machine totaling $25,079.00, which included a 3% processing fee added by the vendor, from supplier 1;
  - Smallware and table linens totaling $4,002.17, in addition to a 3% processing fee added by the vendor, from supplier 2, a non-CCC vendor; and
  - Table linens totaling $1,167.52, in addition to a 3% processing fee added by the vendor, from supplier 2.
- By purchasing the cooking pans and a gelato machine through the vendor and incurring the 3% processing fee, the City College failed to purchase directly from the vendor who could provide the required goods at the lowest price available, as evidenced by the fact that a quote submitted by supplier 1 was for the same price charged through the vendor less the 3% processing fee. The City College could have made this purchase directly from supplier 1, upon supplier 1 applying for and receiving a CCC vendor number. Failure to purchase the goods at the lowest price available violated Article 2.1 of the Board Policies and Procedures for Management and Government.
- The purchase of the cooking pans and the gelato machine totaling $25,079.00 was not subject to a formal competitive bidding process required for purchases exceeding $25,000, in violation of Article 2.2 of the Board Policies and Procedures for Management and Government.
- Being that the purchase of the cooking pans and the gelato machine was made in violation of Article 2.2 of the Board Policies and Procedures for Management and Government and such purchase was made with Perkins Grant funds, such purchase likewise violated Title 2, Subtitle A, Chapter II, Part 200, Subpart D, §200.318 of the Code of Federal Regulations, which essentially requires a federal grant recipient to abide by its own procurement process when administering the grant.
- Neither the purchase of the smallware and table linens totaling $4,002.17 nor the purchase of the table linens totaling $1,167.52 was made after three price quotations or three written bid quotations were obtained, in violation of Article 2.2 of the Board Policies and Procedures for Management and Government.

Based on the investigation, the OIG recommended that the City College's staff members whose duties include procurement-related activities be re-trained regarding the proper procurement policies and procedures.

The president of the City College informed the OIG that procurement-related training was to be scheduled for relevant staff members.

OIG Case Number 17-0217

The OIG received a complaint that a senior reprographics technician assigned to a City College resided outside of the City of Chicago contrary to the CCC Residency Policy. The OIG investigation revealed that the senior reprographics technician resided in Richton Park, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for Management & Government and Section III of the CCC District-Wide Employee Manual.

The OIG investigation further revealed that the senior reprographics technician 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 Richton Park, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

On June 16, 2017, the OIG advised the senior reprographics technician via letter that his presence was requested at the OIG's office for the purpose of an interview on June 22, 2017. Prior to June 22, 2017, at the request of the senior reprographics technician and his union representative, the date of the interview was rescheduled to July 6, 2017. During the rescheduling process, the senior reprographics technician was advised that the subject matter of the interview was his residency. Effective July 1, 2017, the senior reprographics technician retired from his CCC position.

Based on the investigation and the fact that effective July 1, 2017, the senior reprographics technician retired from CCC employment, the OIG recommended that the senior reprographics technician be designated ineligible to be re-hired and that his personnel records reflect this designation.

The senior reprographics technician was subsequently designated ineligible to be re-hired.

OIG Case Number 17-0232

During the course of the 2017 Audit of Compliance with the District's Residency Requirement, the OIG observed that the chief engineer at a City College indicated on the Annual Certification of Residency form submitted online in February 2017 that he was required to be a resident but did not currently reside within the City of Chicago. However, the form reflected that the chief engineer resided at an address in Chicago, Illinois. While the OIG has found that such a response typically indicates an erroneous entry, because an initial review of various public records indicated that the chief engineer might not reside in the City of Chicago, an investigation was initiated.

The OIG investigation revealed that the chief engineer resided in Bellwood, Illinois, in violation of Article 4.6(a) of the Board Policies and Procedures for

Management & Government and Section III of the CCC District-Wide Employee Manual.

The OIG investigation further revealed that the chief engineer falsified employment records in that he fraudulently affirmed on various CCC residency certification documents that he resided in Chicago, Illinois, when in fact he resided in Bellwood, Illinois, in violation of Section IV(11) of the CCC District-Wide Employee Manual.

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

The chief engineer retired from his position with CCC, and he was subsequently designated ineligible to be re-hired.

OIG Case Numbers 17-0251 to 17-0258

The OIG received a memorandum titled "Summary of Findings – Vendor List vs. Employee Roster Conflict of Interest Check" from the CCC Internal Audit Department. According to the memorandum, Internal Audit compared CCC's vendor list with CCC's employee roster and used the following factors for comparison:

- Vendor contact name vs. employee/dependent name
- Vendor phone number vs. employee/dependent phone number
- Vendor address vs. employee/dependent address

After performing the above comparisons, Internal Audit made three findings. The first two findings involved instances in which information in the vendor list intersected with information in the employee roster. The third finding involved an employee who potentially might have provided services to CCC as a vendor during his regular CCC work hours. A cover e-mail sent with the memorandum stated, "We would like to refer these findings to the OIG for investigation as they might potentially constitute situations in which there was a conflict of interest by the employees involved because of their relationships with CCC vendors." Based on this referral, the OIG initiated several investigations.

As a result of the investigations initiated pursuant to the referral from Internal Audit, the OIG made sustained findings regarding four of the employees. The OIG recommended that CCC takes appropriate disciplinary action against each of those four employees. As the disciplinary action taken should be mitigated by the remoteness of time regarding some of the violations as well as the hyper-technical nature of all of the violations, the OIG further recommended that the disciplinary action take the form of a written reprimand and/or additional training.

The findings and the disciplinary action taken regarding these employees were as follows:

- OIG Case Number 17-0251

  The OIG investigation revealed that a full-time faculty member assigned to a City College had a special interest in a contract, work or business of the Board, in that she was the principal of a CCC vendor which received $331.50 from the City College in 2014 for multiple copies of a book that she wrote and published, contrary to Article 5.2.11(1) of the CCC Ethics Policy, which in turn is a violation of Section IV(44) of the CCC District-Wide Employee Manual. The full-time faculty member was issued a written warning.

- OIG Case Number 17-0252

  The OIG investigation revealed that a security officer assigned to a City College had a special interest in a contract, work or business of the Board, in that he was the executive officer behind a CCC vendor which received a total of $750 from the City College in 2015 for three drum line performances at halftime of men's basketball games, contrary to Article 5.2.11(1) of the CCC Ethics Policy, which in turn is a violation of Section IV(44) of the CCC District-Wide Employee Manual. The security officer was issued a verbal warning.

- OIG Case Number 17-0253

  The OIG investigation revealed that a security officer assigned to a City College had a special interest in a contract, work or business of the Board, in that he was a vendor who received a total of $1,100 from a City College for speaking engagements in 2016 and 2017, contrary to Article 5.2.11(1) of the CCC Ethics Policy, which in turn is a violation of Section IV(44) of the CCC District-Wide Employee Manual. The security officer was issued a written warning.

- OIG Case Number 17-0258

  The OIG investigation revealed that a lecturer assigned to a City College had a special interest in a contract, work or business of the Board, in that he was the principal behind a CCC vendor which received a total of $700 from CCC for speaking engagements in 2015 and 2016, contrary to Article 5.2.11(1) of the CCC Ethics Policy, which in turn is a violation of Section IV(44) of the CCC District-Wide Employee Manual.

  From the date that the OIG made its recommendation and as of the date of this Bi-Annual Report, the lecturer was not scheduled to teach any

classes, thus the disciplinary process was not initiated. According to the Office of Human Resources, should the employee not return to active employment after twelve months, the employee will be administratively terminated.

The OIG also made the following recommendations:

1. In order to limit the risk that violations of the CCC Ethics Policy similar to those involving the above employees occur in the future, the OIG recommended that the Department of Administrative and Procurement Services develops a procedure to be followed and a form to be submitted for the purpose of obtaining the appropriate approvals when a CCC employee is requested to provide vendor-type services to CCC.

2. In order to limit the risk that scenarios similar to those involving the above listed employees occur in the future, the OIG recommends that a future annual CCC Ethics Training module includes a scenario emphasizing the Ethics Policy's provisions regarding "Interests in Board Business" to all CCC employees.

As a result of the investigations initiated pursuant to the referral from Internal Audit, the OIG made not sustained findings regarding the following:

- OIG Case Number 17-0254

  Despite having the same address in a multi-unit building as a CCC vendor, a tutor assigned to a City College did not have a special interest in the vendor, which received payments for services provided to CCC in Fiscal Year 2014; therefore, the tutor did not engage in conduct contrary to the CCC Ethics Policy.

- OIG Case Number 17-0255

  Despite having the same address in a multi-unit building as a CCC vendor, a senior research associate assigned to the District Office did not have a special interest in the vendor, which received payments for services provided to CCC in 2013 and 2014; therefore, the senior research associate did not engage in conduct contrary to the CCC Ethics Policy.

- OIG Case Number 17-0256

  Despite having the same address as a retired CCC employee who received a refund of insurance payments from CCC under a vendor number, a lecturer assigned to a City College did not engage in conduct contrary to the CCC Ethics Policy.

- OIG Case Number 17-0257

  Despite having the same address in a multi-unit building as a CCC vendor, an assistant director assigned to the District Office did not have a special interest in the vendor which received payments for services provided to CCC in Fiscal Year 2017; therefore, the assistant director did not engage in conduct contrary to the CCC Ethics Policy.

Based on the above findings, the OIG recommended that CCC takes no action against any of the above four employees.