OFFICE OF INSPECTOR GENERAL
City of Chicago

REPORT OF THE OFFICE OF INSPECTOR GENERAL:

****

ADVISORY CONCERNING
DEPARTMENTAL DOCUMENTATION OF
OPERATING POLICIES AND PROCEDURES

FEBRUARY 2016

OFFICE OF INSPECTOR GENERAL

City of Chicago

Joseph M. Ferguson
Inspector General

740 N. Sedgwick Street, Suite 200
Chicago, Illinois 60654
Telephone: (773) 478-7799
Fax: (773) 478-3949

<u>**VIA ELECTRONIC MAIL**</u>

February 25, 2016

Joe Deal
Chief Operating Officer
Office of the Mayor
121 North LaSalle Street
Chicago, Illinois 60602

Dear Chief Operating Officer Deal:

The City of Chicago Office of Inspector General (OIG) has completed a review of the City's practices for documenting operating policies and procedures.[1] Regularly maintained, thorough, and well communicated policies and procedures are critical tools for both operational efficiency and government accountability. Policies that are not documented and distributed may be inadequately followed or misunderstood. OIG investigations and audits have revealed that various departments do not properly document, and communicate to staff, their policies and procedures. This lack of documentation and communication undermines the City's ability to govern effectively and efficiently and has resulted in lost revenue and decreased employee accountability.

For this review, we sent a questionnaire to 32 City departments to learn about their specific policy- and procedure-making practices. We received a variety of responses. Some departments reported that they fully documented and regularly updated policies and procedures, notified staff of policy and procedural changes, and documented that notification. However, others reported that they,

- did not have a written or defined policy and procedure review process;

- had documented and updated fewer than 75% of their policies and procedures;

- did not update controls to ensure the implementation of new policies and procedures.

---

[1] For the purposes of this advisory, "policies" refers to the formal guidance that describes broad goals or rules that apply to the *operations* of a department—not public policy initiatives. "Procedures" refers to the operational processes required to implement a policy. For example, a policy might be: Supervisors must approve all employee vacation leave requests. The related procedure might be: Employees must submit a documented request for vacation leave at least one week in advance of the requested date, and must obtain their direct supervisor's documented approval prior to the leave. Policies and procedures may be either department-specific (affecting only the employees, customers, and vendors involved with that department) or City-wide (affecting all City departments, employees, and vendors—e.g., hiring rules, procurement).

With 32,059 staff employed in various departments, offices, and field locations, ensuring that all City employees are familiar with relevant policies and procedures can be a challenge. However, we encourage the Mayor's Office to provide guidance to ensure standard practices, as outlined in federal best practices, are followed across departments. This will promote compliance and accountability among the City's workforce, as well as good governance more generally.

I.   OIG AUDITS AND INVESTIGATIONS HAVE FOUND INADEQUATELY DOCUMENTED AND DISSEMINATED POLICIES

Effective documentation, dissemination, and periodic review of policies and procedures are fundamental to the success of any operation. They are among basic control activities needed to communicate expectations, hold individuals accountable, and achieve an organization's mission. In the public sector, the *Standards for Internal Control in the Federal Government* (commonly called the "Green Book") published by the United States Government Accountability Office is widely recognized as the leading guidance for governments seeking to improve accountability.[2] The Green Book states that "management should implement control activities through policies" that are documented, communicated internally and externally to appropriate parties, and supplemented as needed by operating procedures.[3] It is important that "management periodically reviews policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks."[4]

The guidance of the Green Book helps a government run efficiently and manage risks for the government and tax payers. Past OIG investigations and audits found that the lack of documentation or notification of policies and procedures can undermine the City's ability to govern effectively and efficiently, and result in lost revenue for the City and decreased accountability. For example:

- An audit of the Department of Water Management's (DWM) inventory processes revealed that DWM did not have department-specific written policies and procedures for its manual inventory operations and was not aware of the City-wide policy set forth by the Comptroller to standardize inventory procedures.[5] DWM's processes "were inadequate to ensure that assets were properly accounted for and safeguarded," putting the Department at risk of inventory loss and project delays. Moreover, DWM's inventory operations were in violation of the City-wide inventory policy.

- An investigation revealed that it was common practice among laborers to destroy garbage carts in the back of garbage trucks. However, Department of Streets and Sanitation (DSS)

---

[2] U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), (Washington, DC, September 2014), accessed February 5, 2016, http://www.gao.gov/assets/670/665712.pdf.
[3] *Ibid,* 56.
[4] *Ibid,* 56.
[5] While the purpose of the City-wide policy was to establish uniform inventory procedures, it recognized that department-specific policies and procedures were necessary to address specific inventory systems. City of Chicago, Office of Inspector General, "Department of Water Management Inventory Process Audit," October 2012, accessed October 19, 2015, http://chicagoinspectorgeneral.org/wp-content/uploads/2012/10/2012-DWM-Inventory-Audit-Report-Final.pdf.

management stated to OIG that such action was expressly prohibited.[6] Unfortunately, DSS management had never documented the prohibition of this practice in a policy and therefore, OIG could not recommend any discipline for the employees' improper destruction of garbage carts.[7]

- An investigation revealed that a DWM fieldworker commonly sold scrap material to a private recycler during work hours and kept the money received. While the employee was suspended for selling City property,[8] the conduct also specifically violated a City-wide policy, issued in July 2012 by the Department of Procurement Services (DPS), requiring scrap materials to be sold at public auction to raise revenue. DPS had informed DWM management of this policy via memo, but DWM management did not update its procedures or notify staff of the new policy. As a result, the City lost revenue from the removed scrap materials and the productivity from staff time spent selling those materials.[9]

II.   QUESTIONNAIRE RESULTS

OIG sent a questionnaire to 32 City departments on February 26, 2015 to learn about their practices related to the documentation and management of policies and procedures.[10] We found that many departments lacked documented, current, and clearly communicated policies and procedures. We lay out the results of our questionnaire in further detail below.

We have included the questionnaire and a numeric summary of the responses in Appendix A of this report. A list of the City departments and their respective number of employees is provided in Appendix B. We note relevant question numbers throughout this section. For the purpose of the advisory, we did not verify that the practices reported by departments were, in fact, in place.

A.   Over half of City departments did not periodically review policies to consider missing policies or necessary revisions, and the majority of City Departments had undocumented or undefined processes related to the creation, review, and approval of policy changes.

Departments reported the following practices for reviewing policies and procedures:

- Twenty departments, or over half of the City's departments, did not review policies on a regular basis in order to identify the need to create or revise policies. Instead these

---

[6] For more information on the investigation, see "Department Notification to the Department of Streets and Sanitation Regarding Garbage Cart Disposal" in the *Quarterly Report of the Office of Inspector General First Quarter 2014* at http://chicagoinspectorgeneral.org/wp-content/uploads/2014/04/OIG_Q1_2014_Report.pdf

[7] DSS did have a policy covering how to dispose of garbage carts, but it did not prohibit destroying them in the truck. This policy, although documented, had not been communicated to laborers, who stated they were not aware of it.

[8] For more information on the investigation, see "OIG Case # 13-0208" in the *Quarterly Report of the Office of Inspector General First Quarter 2014* at http://chicagoinspectorgeneral.org/wp-content/uploads/2014/04/OIG_Q1_2014_Report.pdf

[9] OIG recommended disciplinary action by DWM against this employee, up to and including termination commensurate with conduct and history of the employee.

[10] OIG did not send this questionnaire to the Office of the Mayor, City Council, or the Board of Election Commissioners.

---

departments reactively updated policies when issues arose (Question 2). These 20 departments represent 10,819, or 33.7%, of City of Chicago employees and include the departments of Streets and Sanitation (DSS), Water Management (DWM), Aviation (CDA), and the Office of Emergency Management and Communications (OEMC), large departments which each employ more than 3% of City employees.

- Twenty-three departments, or 71.9% of respondents, had undocumented or undefined processes related to the creation, review, and approval of policy changes (Question 4).

- Seven departments, or 21.9% of respondents, had no person or group responsible for identifying if new or revised policies required procedural changes (Question 19).

The questionnaire also established that, of 12 departments that regularly issue City-wide policies,[11] 4, or 33.3%, did not have mayoral staff review those policies (Question 6), and 3, or 25.0%, did not have mayoral staff approve them (Question 8).[12]

B. A number of departments did not document and update all policies and procedures, and many departments considered doing so a low priority.

One of the purposes of the questionnaire was to determine the current state of departmental policies and procedures. Therefore, OIG asked the departments to estimate the percentage of their policies and procedures that were documented and up-to-date. The following chart depicts four questions addressing these concerns, the possible multiple choice answers, and the number of departments that chose each answer. (The chart in Appendix C of this report provides a departmental breakdown of the responses.)

---

[11] While one department stated that it assisted departments in the review, approval, and creation of City-wide policies, it was not involved in the notification of those policies. Therefore, question 18 reflects an additional department with a "not applicable" answer than reflected in questions 6, 8, and 35.

[12] OIG does not assert that it is necessary that the Mayor's Office review and approve policies and procedures before departments implement them. Rather, we offer this as information garnered via the questionnaire.

Question	Multiple Choice Answers	Number (Percent) of Departments that chose each answer	
10. In your estimation, what percentage of the department's policies are documented?	100%	7 (21.9%)	
	90%	15 (46.9%)	
	75%	8 (25.0%)	
	50% or less	2 (6.3%)	
11. In your estimation, what percentage of the department's documented policies are up-to-date?	100%	7 (21.9%)	
	90%	18 (56.3%)	
	75%	6 (18.8%)	
	50% or less	1 (3.1%)	
21. In your estimation, what percentage of the department's procedures are documented?	100%	6 (18.8%)	
	90%	10 (31.3%)	
	75%	11 (34.4%)	
	50% or less	5 (15.6%)	
22. In your estimation, what percentage of the department's documented procedures are up-to-date?	100%	5 (15.6%)	
	90%	15 (46.9%)	
	75%	9 (28.1%)	
	50% or less	3 (9.4%)	

Source: Department responses as noted in Appendix A.

Regarding the percentage of policies and procedures that were documented, 22, or over half of City departments, estimated that 90-100% of their policies were documented, and 16 departments, or 50.0% of respondents, estimated that 90-100% of their procedures were documented. In contrast, these same questions revealed that 10, or just over a fourth of City departments, estimated that 75% or fewer of their policies were documented, and 16 departments, or 50.0% of respondents, estimated that 75% or fewer of their procedures were documented.[13]

With regards to how up-to-date their policies and procedures were, over two thirds of City departments, 25 respondents, estimated that 90-100% of their documented policies were current, and 20 departments, or 62.5% of respondents, estimated 90-100% of their documented procedures were current. The questions also revealed that 7 departments, or 21.9% of respondents, estimated that 75% or fewer of their documented policies were current and 12 departments, or 37.5% of respondents, estimated that 75% or fewer of their documented procedures were current.

Responses to other portions of the questionnaire revealed the following:

- Seven departments, or 21.9% of respondents, did not make reference in policies to related procedures and vice versa (Questions 32 and 33). Two other departments answered that either policies referenced procedures or procedures referenced policies, but not both.

---

[13] One department stated the documentation of policies was not applicable to their department because it only followed City policies and, thus, had no internal policies of its own. Therefore, they chose "50% or Less" as the answer to question 10.

- Five departments, or 20.0% of 25 departments with less than 100% of their policies documented and current, said that they had a plan to document and update policies, but that it was a low or long-term priority (Question 12).[14] Another department that estimated that 50% of their policies were documented said it had no plan to document the remaining policies.

- Eight departments, or 29.6% of 27 departments with less than 100% of their procedures documented and current, said that they had a plan to document and update procedures, but that it was a low or long-term priority (Question 23).[15] Two departments that estimated that 50% or less of their procedures were documented said they had no plan to document the remaining policies.[16]

- A minority of City departments, four respondents, reported that no individual or group was responsible for documenting departmental policy changes (Question 3). Eleven departments said they did not ensure consistent formatting for policies (Question 9).

C.   Many departments do not update controls to ensure policy changes are implemented or do not store policies in a single location.

Most departments reported that they used e-mail to notify employees of both policy and procedural changes, and many of these departments also post the notification in a central location (Questions 13 and 24). For example, 28 questionnaire respondents reported sending policy changes by e-mail, and 17 of those departments also posted the notifications either on an intranet, in a central physical location, or both. Most departments also reported distributing notifications through their chain of command.

However, our questionnaire found that only 13 respondents, a little over a third of City departments, updated system controls to ensure new or updated policies and procedures were implemented (Question 34). Twelve departments, or 37.5% of respondents, checked on an ad hoc basis to ensure implementation.

Concerning how departments maintain both internal and City-wide policies and procedures, our questionnaire found the following:

- Nine departments, or 28.1% of respondents, did not maintain all policies in a single location, and 14, or 43.8% of respondents, did not keep procedures in a single location (Questions 29 and 31).

- Thirteen departments, or 40.6% of respondents, kept City-wide policies in the same location as internal policies, twelve departments, or 37.5% of respondents, kept City-

---

[14] Four of these departments estimated that 90% of policies were documented and at least 75% current. One department estimated that 75% of policies were documented and 90% current.
[15] Two of these departments estimated 90% of procedures were documented and at least 75% current. Four departments estimated 75% of procedures were documented and at least 75% current. Two departments estimated 50% of procedures were documented and at least 75% current.
[16] One of these departments stated that they have only two employees and the other stated that they "recognize the need to document such day to day activities."

wide and internal policies in separate locations, and two departments did not keep City-wide policies at all (Question 30). [17]

III.   OIG SUGGESTIONS

While department leadership can implement their own improvement strategies regarding the management of policies and procedures, we suggest that the Mayor's Office provide a framework for departments to follow. This framework could include the following considerations:

- Departments should periodically review policies and procedures to determine whether they reflect actual operating activities and should use this review to create or revise policies. A periodic review, with input from staff and management, may include the following:
  - o   identifying gaps, new laws, or outdated practices. This should include a review of industry best practices for the subject area as appropriate;
  - o   identifying necessary procedural changes to support new or existing policies;
  - o   creating comprehensive practices to promote compliance with the policy (for example, defining standards when granting user access and implementing mandatory data fields); and
  - o   periodically auditing operations to ensure policies are followed and are functioning as expected.

- Department management should define and document the specific procedures related to the creation, review, approval, notification, and disbursement of departmental policies and procedures. This would memorialize how the process works in the event of leadership changes. In addition, each department should identify person(s) or group(s) responsible for ensuring policies and procedures are documented and kept current. A department may have more than one designee, depending on its operational structure.

- Departments should establish a common location where all department-specific and City-wide policies and procedures are maintained and made available to employees. The Mayor's Office should consider defining and establishing a common online repository for department-specific and City-wide policies.

- The Mayor's Office should design general policy and procedure templates and make them available to all departments. The templates would promote greater consistency throughout City departments regarding the documentation of policies and procedures. The templates could also define key information such as a reference number, title, description, purpose, issue date, effective date, revision date(s), and specific details that support operations. The templates could also include instructions to management for how to complete entries. As noted in the questionnaire responses, some departments already employ a template to document policies and/or procedures.[18] Therefore, the template suggested here would assist departments in creating policies or improving any existing template they may use.

---

[17] The three most common separate locations were on the City's website, on internal share drives, or within the applicable division.
[18] See Appendix D for a copy of the Department of Aviation's template for standard operating procedures.

- Policies and procedures should be documented to assure both compliance and accountability, and to memorialize practices as leadership and staff change. Because staffing changes can occur at any time, memorializing practices should be a high priority to avoid a loss of institutional knowledge upon staff departure.

- Management should ensure that departmental staff are notified of all policies and relevant procedures. This notification should be documented so that employees can be held accountable in the event that their actions do not comport with a policy or procedure.

With respect to departments that issue City-wide policies, the Mayor's Office should consider the following:

- The Mayor's Office should identify clear standards defining when the Office should be included as part of the review and/or approval process for City-wide policies.

- The Mayor's Office should employ a consistently-formatted policy template so that all City-wide policies are easily recognized by City employees.

IV. CONCLUSION

Given the size of the City's workforce, it is critical for City management to ensure that employees are informed of and comply with policies and procedures. Our questionnaire revealed that there is no City-wide standard regarding practices for documenting, updating, and disseminating policies and procedures and, therefore, there are inconsistencies among the departments. As the City's leadership, the Mayor's Office is well positioned to see how these problems impact operations within departments and across the City. We encourage you to provide guidance to departments on best practices for documenting operating policies and procedures and notifying employees of changes. Doing so will allow the City to leverage the work of those departments with strong processes related to the creation, documentation, and implementation of policies and procedures to improve those departments with operational gaps, and promote more effective governance and accountability across all departments.

We thank the departments for their cooperation with the questionnaire. OIG invites the Mayor's Office to respond in writing before March 25, 2016. Any such response will be made public together with this OIG Advisory.

Respectfully,

Joseph M. Ferguson
Inspector General
City of Chicago

cc: Eileen Mitchell, Chief of Staff

V.   APPENDIX A – QUESTIONNAIRE AND RESULTS

The following table details the specific questions asked of the departments as well as the number of departments that chose each of the multiple choice answers. (Question 1 requested contact information for the individual completing the questionnaire.)

Questions and Answers	Number of Departments
2. Does the department periodically conduct a comprehensive review of policies specifically to identify the need to create or revise policies?	
a. Yes.	12
b. No, the department doesn't have a comprehensive review process but updates policies as needs arise.	20
3. Is there an individual or group within the department responsible for department-wide documentation of policy changes—new policies as well as revisions to existing policies?	
a. Yes.	18
b. No.	4
c. Other.	10
4. Does the department have a defined and documented process for the creation, review, and approval of policy changes?	
a. Yes, the process is defined and documented.	4
b. No, while the process is defined, it is not documented.	10
c. No, a process is not defined or documented, but completed on an as needed basis.	13
d. Other.	5
5. Who reviews proposed policy changes? (Choose all that apply.)	
a. The employees and management who are directly responsible for following or implementing the proposed policy changes.	20
b. The department's upper management.	28
c. The department has a committee which reviews all proposed policy changes.	4
d. The Commissioner or Department Head.	24
e. Other.	11
6. Who reviews proposed policy changes that are intended for City-wide implementation? (Choose all that apply.)	
a. The department's upper management and/or the Commissioner or Department Head.	12
b. The department has a committee which reviews all proposed City-wide policy changes.	1
c. Staff from the Mayor's Office.	8
d. Not applicable because the department does not issue City-wide policies.	20
e. Other.	4

7. Who approves proposed policy changes? (Choose all that apply.)	
a. The manager(s) directly responsible for implementing the proposed policy changes.	10
b. The department's upper management.	19
c. The department has a committee which approves all proposed policy changes.	3
d. The Commissioner or Department Head.	28
e. Other.	9
8. Who approves proposed policy changes intended for City-wide implementation? (Choose all that apply.)	
a. The department's upper management.	9
b. The department has a committee which approves all City-wide policy changes.	1
c. The Commissioner or Department Head.	11
d. Staff from the Mayor's Office.	9
e. Not applicable because the department does not issue City-wide policies.	20
f. Other.	3
9. How does the department ensure policies are documented in a consistent format and are easily identifiable as policies?	
a. The department uses a standard template for all new policies.	11
b. There is no template guide, but department management reviews all policies to ensure consistent formatting.	6
c. The department does not ensure consistent formatting. (For example, the policies may not be consistently formatted because the department places emphasis on the content of the policy, rather than the document's appearance.)	11
d. Other.	4
10. In your estimation, what percentage of the department's policies are documented?	
a. 100%	7
b. 90%	15
c. 75%	8
d. 50%	1
e. Less than 50%	0
f. N/a. (This response was added per MOPD's comments that this question was not applicable. See footnote XX.)	1
11. In your estimation, what percentage of the department's documented policies are up-to-date (in other words, they represent current legislation, City-wide directives, and current operations)?	
a. 100%	7
b. 90%	18
c. 75%	6
d. 50%	1
e. Less than 50%	0

12. If less than 100% of the department's policies are documented and up-to-date, does the department have a plan to document and update policies?	
a. Yes, we are actively working to document and update policies in the near term.	19
b. Yes, we have a plan, but it is a low or long-term priority for the department.	5
c. No, we currently do not have a plan to document and update policies.	1
d. Not applicable because all policies are documented and up-to-date.	7
13. When the department issues new or revised policies, how does it notify employees? (Choose all that apply.)	
a. Via e-mail.	28
b. Via intranet.	13
c. Posting a hard copy of the notification in a common area.	12
d. Notification is made through the chain of command (upper management notifies supervisors, and supervisors inform staff).	26
e. The department does not have a defined standard for notifying employees of new or revised policies.	3
f. Other.	13
14. When another department issues new or revised City-wide policies, does your department notify its employees of the changes in the same manner as answered in Question 13?	
a. Yes.	28
b. No, we notify employees of City-wide policies, but the process is different.	2
c. No, we do not notify employees of City-wide policies because that is the responsibility of the issuing department.	0
d. Other.	2
15. When your department creates or revises a policy, is there an individual or group responsible for notifying external parties that may be affected by the policy changes (such as vendors, residents, or other City departments involved in the process)?	
a. Yes.	12
b. No.	5
c. Other.	15
16. How does the department document that all employees are notified of new or revised policies?	
a. Employees are required to sign a form that acknowledges they received the new or revised policies.	7
b. Supervisors maintain meeting records (including attendance) when new or revised policies are discussed.	0
c. The department's upper management e-mails the new or revised policies to all affected employees.	13
d. Our department does not have a process to document employees are notified of policy changes.	0
e. Other.	12

17. Does the department document that all employees are notified of a new or revised City-wide policy in the same manner as answered in Question 16? (Choose all that apply.)	
a. Yes.	20
b. No, we document the notification, but the process is different.	2
c. No, we do not document that employees are notified of City-wide policies.	3
g. Other.	7
18. When your department creates a new City-wide policy, how does your department notify other City departments? [19]	
a. Via e-mail.	7
b. After updating policies and procedures documents, management does not specifically notify other City departments.	0
c. Not applicable because our department does not issue City-wide policies.	21
d. Other.	4
19. Is there an individual or group within the department responsible for identifying if a new or revised policy requires procedural changes?	
a. Yes.	14
b. No.	7
c. Other.	11
20. Is staff involved in creating and reviewing new procedures (whether they are created to support a new policy or created independent of policy changes)?	
a. Yes, management seeks staff's input.	28
b. No, management is solely responsible.	2
c. Other.	2
21. In your estimation, what percentage of the department's procedures are documented?	
a. 100%	6
b. 90%	10
c. 75%	11
d. 50%	4
e. Less than 50%	1
22. In your estimation, what percentage of the department's documented procedures are up-to-date (in other words, they support current policies)?	
a. 100%	5
b. 90%	15
c. 75%	9
d. 50%	2
e. Less than 50%	1

---

[19] While one department stated that it assisted departments in the review, approval, and creation of City-wide policies, it was not involved in the notification of those policies. Therefore, question 18 reflects an additional department with a "not applicable" answer than reflected in questions 6, 8, and 35.

23. If less than 100% of the department's procedures are documented and up-to-date, does the department have a plan to document and update procedures?	
a. Yes, we are actively working to document and update procedures in the near term.	17
b. Yes, we have a plan, but it is a low or long-term priority for the department.	8
c. No, we currently do not have a plan to document and update procedures.	2
d. Not applicable because all procedures are documented and up-to-date.	5
24. When the department issues new or revised procedures, how does it notify employees? (Choose all that apply.)	
a. Via e-mail.	29
b. Via intranet.	13
c. Posting a hard copy of the notification in a common area.	13
d. Notification is made through the chain of command (upper management notifies supervisors, and supervisors inform staff).	29
e. The department does not have a defined standard for notifying employees of new or revised procedures.	2
f. Other.	9
25. Is there an individual or group within the department responsible for notifying employees affected by procedural changes?	
a. Yes.	17
b. No.	6
c. Other.	9
26. Is there an individual or group within the department responsible for notifying other City departments, vendors, or residents that are affected by procedural changes?	
a. Yes.	15
b. No.	5
c. Other.	12
27. How does the department document that affected employees are notified of updated procedures?	
a. Employees are required to sign a form that acknowledges they received the updated procedures.	3
b. Supervisors maintain meeting records (including attendance) when updated procedures are discussed.	1
c. The department's upper management e-mails the updated procedures to all affected employees.	16
d. Our department does not have a process to document that employees are notified of updated procedures.	0
e. Other.	12

28. How does the department determine whether employee training is necessary for new or revised procedures?	
a. Affected employees determine whether training is necessary.	1
b. The affected employees' direct supervisor determines whether training is necessary.	13
c. The department's upper management determines whether training is necessary.	9
d. Affected employees are trained in all new or revised procedures.	1
e. Our department does not have a process to determine whether employee training is necessary for new or revised procedures.	1
f. Other.	7
29. Does the department maintain all policies in a single location?	
a. Yes, all policies are maintained in the department's policies manual, shared drive, page of the City of Chicago Intranet, or similar medium.	16
b. No, policies are not maintained in a single location.	9
c. Other.	7
30. Are City-wide policies (received from other departments) documented and maintained in the same location as answered in Question 29?	
a. Yes, all policies (including those received from other departments) are maintained in the same location.	13
b. No, City-wide policies received from other departments are maintained separately within our department.	12
c. No, our department does not maintain City-wide policies received from other departments.	2
d. Other.	5
31. Does the department maintain all procedures in a single location?	
a. Yes, all procedures are maintained in the department's procedures manual, shared drive, page of the City of Chicago Intranet, or similar medium.	16
b. No, procedures are not maintained in a single location.	14
c. Other.	2
32. Do policies reference supporting procedures? For example, do policies include hyperlinks to supporting procedures or references to procedure numbers or titles?	
a. Yes.	14
b. No.	8
c. Other.	10
33. Do procedures reference the policies that they support? For example, do procedures include hyperlinks to the policies they support, or references to policy numbers or titles?	
a. Yes.	14
b. No.	8
c. Other.	10

34. How does the department ensure that new or revised policies and supporting procedures are implemented?	
a. Management updates formal system controls (for example, by changing forms, user access limits, reporting requirements) to ensure that employees have implemented the policies and related procedures.	13
b. Management checks on an ad-hoc basis to ensure employees are in compliance of the policies and procedures.	12
c. Management does not specifically check to ensure implementation.	0
d. Other.	7
35. If the department creates City-wide policies, how does the department ensure that those policies are implemented by other departments?	
a. Management updates formal system controls (for example, by changing forms, user access limits, reporting requirements) to ensure that departments have implemented the policies.	4
b. Management checks on an ad-hoc basis to ensure that departments have implemented the policies.	1
c. Management relies on the professionalism of other departments to ensure implementation.	1
d. Not applicable because the department does not issue City-wide policies.	20
e. Other.	6
36. Does the department make policies and procedures directly accessible to affected employees?	
a. Yes, policies and procedures are stored in an electronic format to which all affected employees have access.	16
b. Yes, policies and procedures are stored in a hard copy policies and procedures manual to which all affected employees have access.	2
c. No, employees must make a special request via their supervisor to view policies and procedures.	2
d. Other.	12
37. Are City-wide policies that impact the department accessible in the same manner as answered in Question 36?	
a. Yes, City-wide policies are stored in an electronic format to which all employees have access.	12
b. Yes, City-wide policies are stored in a hard copy policies and procedures manual to which all employees have access.	0
c. No, employees must make a special request via their supervisor to view City wide policies.	2
d. Other.	18

VI.   APPENDIX B – THE NUMBER OF ACTIVE EMPLOYEES IN EACH DEPARTMENT

Documented policies and procedures are tools to assist City employees in performing their specific job responsibilities and, thus, the departments in completing their specific objectives. To identify the number of individuals directly impacted by the documentation of policies and procedures (or lack of thereof), the following lists all City departments and the relative number of employees as of July 16, 2015.[20]
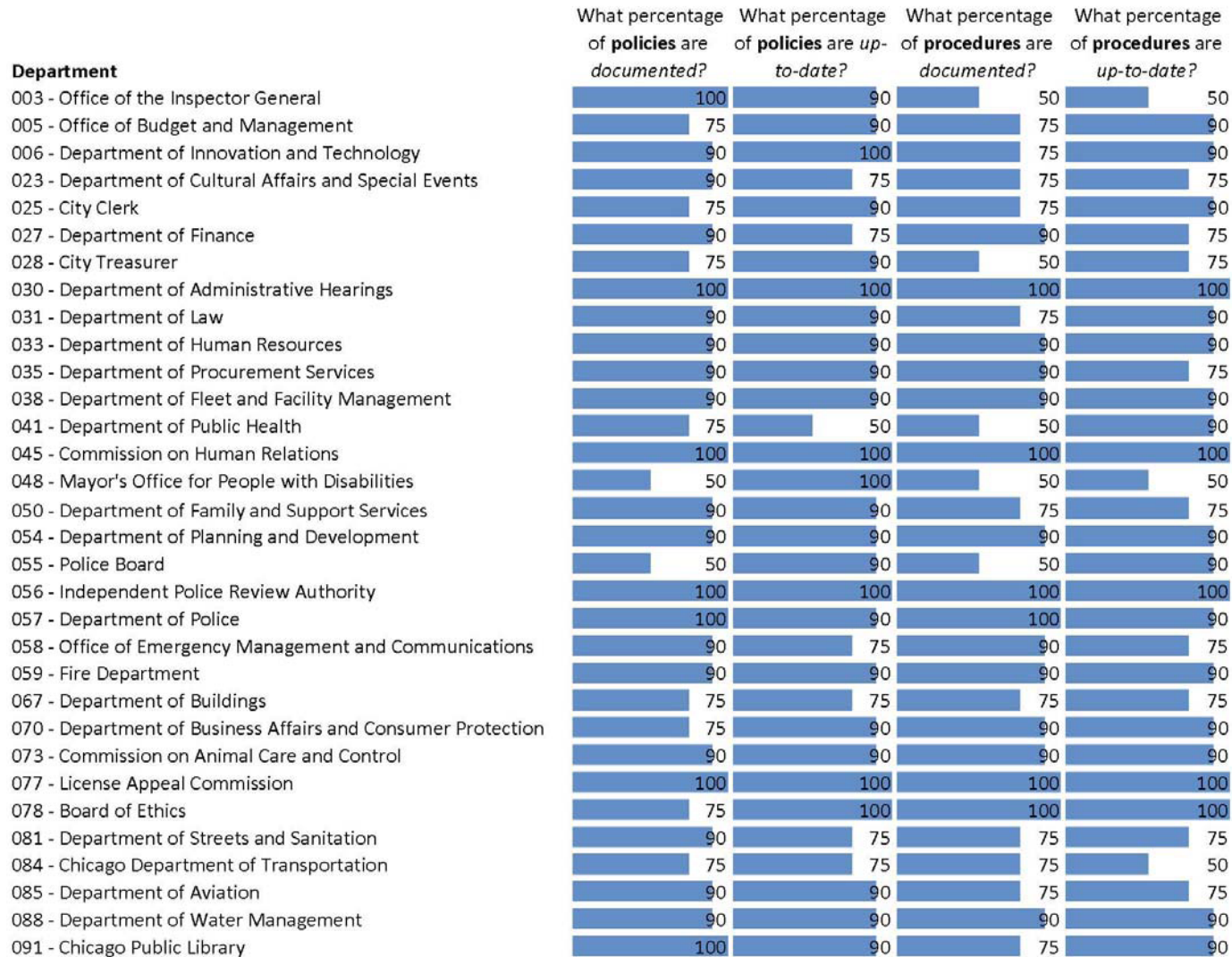
Department	Number and % of Active Employees	
001 - Office of the Mayor	112	0.35%
003 - Office of Inspector General	55	0.17%
005 - Office of Budget and Management	43	0.13%
006 - Department of Information Technology	108	0.34%
015 – City Council	449	1.40%
023 - Department of Cultural Affairs	84	0.26%
025 - City Clerk	102	0.32%
027 - Department of Finance	560	1.75%
028 - City Treasurer	20	0.06%
030 - Department of Administrative Hearings	39	0.12%
031 - Department of Law	425	1.33%
033 - Department of Human Resources	66	0.21%
035 - Department of Procurement Services	80	0.25%
038 - Fleet and Facility Management	925	2.89%
039 - Board of Election Commissioners	112	0.35%
041 - Department of Public Health	537	1.68%
045 - Commission on Human Relations	16	0.05%
048 - Mayor's Office of Disabilities	32	0.10%
050 - Family and Support Services	660	2.06%
054 - Department of Planning and Development	207	0.65%
055 - Police Board	2	0.01%
056 - Independent Police Review Authority	84	0.26%
057 - Department of Police	13,494	42.09%
058 - Office of Emergency Mgmt & Communications	1,102	3.44%
059 - Fire Department	4,869	15.19%
067 - Department of Buildings	250	0.78%
070 - Business Affairs And Consumer Protection	170	0.53%
073 - Commission on Animal Care and Control	63	0.20%
077 - License Appeal Commission	1	0.00%
078 - Board of Ethics	9	0.03%
081 - Department Streets and Sanitation	2,043	6.37%
084 - Department of Transportation	1,190	3.71%
085 - Department of Aviation	1,339	4.18%
088 - Department of Water Management	1,871	5.84%
091 - Chicago Public Library	940	2.93%
Total	**32,059**	**100.00%**

Source: Department of Human Resources (DHR)

---

[20] This includes the three departments to whom OIG did not send the questionnaire: Office of the Mayor, City Council, and the Board of Election Commissioners.

VII.   APPENDIX C – DOCUMENTED AND UP-TO-DATE POLICIES AND PROCEDURES BY DEPARTMENT

This chart visually depicts each department's response to questions about how many of their policies and procedures were documented and up-to-date.

Department	What percentage of **policies** are documented?	What percentage of **policies** are up-to-date?	What percentage of **procedures** are documented?	What percentage of **procedures** are up-to-date?
003 - Office of the Inspector General	100	90	50	50
005 - Office of Budget and Management	75	90	75	90
006 - Department of Innovation and Technology	90	100	75	90
023 - Department of Cultural Affairs and Special Events	90	75	75	75
025 - City Clerk	75	90	75	90
027 - Department of Finance	90	75	90	75
028 - City Treasurer	75	90	50	75
030 - Department of Administrative Hearings	100	100	100	100
031 - Department of Law	90	90	75	90
033 - Department of Human Resources	90	90	90	90
035 - Department of Procurement Services	90	90	90	75
038 - Department of Fleet and Facility Management	90	90	90	90
041 - Department of Public Health	75	50	50	90
045 - Commission on Human Relations	100	100	100	100
048 - Mayor's Office for People with Disabilities	50	100	50	50
050 - Department of Family and Support Services	90	90	75	75
054 - Department of Planning and Development	90	90	90	90
055 - Police Board	50	90	50	90
056 - Independent Police Review Authority	100	100	100	100
057 - Department of Police	100	90	100	90
058 - Office of Emergency Management and Communications	90	75	90	75
059 - Fire Department	90	90	90	90
067 - Department of Buildings	75	75	75	75
070 - Department of Business Affairs and Consumer Protection	75	90	90	90
073 - Commission on Animal Care and Control	90	90	90	90
077 - License Appeal Commission	100	100	100	100
078 - Board of Ethics	75	100	100	100
081 - Department of Streets and Sanitation	90	75	75	75
084 - Chicago Department of Transportation	75	75	75	50
085 - Department of Aviation	90	90	75	75
088 - Department of Water Management	90	90	90	90
091 - Chicago Public Library	100	90	75	90

VIII.   APPENDIX D – CHICAGO DEPARTMENT OF AVIATION TEMPLATE

The following is an example of one department's instructions regarding the creation of standard operating procedures (SOP).

Source: Chicago Department of Aviation (CDA)

Public Inquiries	Rachel Leven (773) 478-0534 rleven@chicagoinspectorgeneral.org
To Suggest Ways to Improve City Government	Visit our website: https://chicagoinspectorgeneral.org/get-involved/help-improve-city-government/
To Report Fraud, Waste, and Abuse in City Programs	Call OIG's toll-free hotline 866-IG-TIPLINE (866-448-4754). Talk to an investigator from 8:30 a.m. to 5:00 p.m. Monday-Friday. Or visit our website: http://chicagoinspectorgeneral.org/get-involved/fight-waste-fraud-and-abuse/

MISSION

The City of Chicago Office of Inspector General (OIG) is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government. OIG achieves this mission through,

- administrative and criminal investigations;

- audits of City programs and operations; and

- reviews of City programs, operations, and policies.

From these activities, OIG issues reports of findings and disciplinary and other recommendations to assure that City officials, employees, and vendors are held accountable for the provision of efficient, cost-effective government operations and further to prevent, detect, identify, expose and eliminate waste, inefficiency, misconduct, fraud, corruption, and abuse of public authority and resources.

AUTHORITY

The authority to produce reports and recommendations on ways to improve City operations is established in the City of Chicago Municipal Code § 2-56-030(c), which confers upon the Inspector General the following power and duty:

To promote economy, efficiency, effectiveness and integrity in the administration of the programs and operations of the city government by reviewing programs, identifying any inefficiencies, waste and potential for misconduct therein, and recommending to the mayor and the city council policies and methods for the elimination of inefficiencies and waste, and the prevention of misconduct.