

DECEMBER 2019

CITY OF CHICAGO OFFICE OF INSPECTOR GENERAL

AUDIT AND PROGRAM REVIEW SECTION
2020 ANNUAL PLAN

APPROVED BY THE INSPECTOR GENERAL DECEMBER 30, 2019



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ACRONYMS

2FM	Department of Fleet and Facility Management
APR	Audit and Program Review Section of the Office of Inspector General
BACP	Department of Business Affairs and Consumer Protection
BEPD	Business Enterprises owned by People with Disabilities
CBOEC	Chicago Board of Election Commissioners
CDA	Chicago Department of Aviation
CDOT	Chicago Department of Transportation
CDPH	Chicago Department of Public Health
CFD	Chicago Fire Department
CIP	Capital Improvement Program
COPA	Civilian Office of Police Accountability
CPD	Chicago Police Department
CPL	Chicago Public Library
DBE	Disadvantaged Business Enterprise
DFSS	Department of Family and Support Services
DHR	Department of Human Resources
DOB	Department of Buildings
DOF	Department of Finance
DPD	Department of Planning and Development
DSS	Department of Streets and Sanitation
DWM	Department of Water Management
GAS	Government Auditing Standards
MCC	Municipal Code of Chicago
OBM	Office of Budget and Management
OEMC	Office of Emergency Management and Communications
OIG	Office of Inspector General
PBC	Public Building Commission
TIF	Tax Increment Financing

I. 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 operation of City government.

The OIG Audit and Program Review (APR) section supports the OIG mission by conducting independent, objective analysis and evaluation of municipal programs and operations, issuing public reports, and making recommendations to strengthen and improve the delivery of public services.

APR conducts performance audits of Chicago municipal programs and operations in accordance with generally accepted Government Auditing Standards (GAS or “Yellow Book,” 2018 revision) established by the United States Government Accountability Office. As defined in GAS 1.21,

Performance audits provide objective analysis, findings, and conclusions to assist management and those charged with governance and oversight, with, among other things, improving program performance and operations, reducing costs, facilitating decision making by parties responsible for overseeing or initiating corrective action, and contributing to public accountability.

In addition to performance audits, APR may also generate non-audit work such as advisories, notifications, and descriptions of programs.¹

APR’s role is separate from, but complements, the work performed by the OIG Investigations and Public Safety (police oversight) sections. Investigations primarily examines allegations of individual misconduct or wrongdoing, and Public Safety focuses on the Police Department, COPA, and the Police Board, endeavoring to promote public safety, protect civil liberties and civil rights, and ensure the accountability of the police force. APR undertakes projects designed to help the City maximize the effectiveness and efficiency of programs and processes. APR is also distinct from the OIG Hiring Oversight team, which performs legally mandated reviews of the City’s hiring and employment practices to ensure compliance with the City’s various hiring Plans.

¹ OIG advisories and department notifications describe management problems observed by OIG through direct review or in the course of other activities.

II. PURPOSE OF THE ANNUAL PLAN

The purpose of the APR Annual Plan is to identify potential projects for the upcoming fiscal year. Projects are selected based on OIG's prioritization criteria, which we describe below.

A. SUBJECT TO CHANGE

The Annual Plan is a guiding document that is subject to change; it does not prohibit APR from setting new priorities or initiating different projects over the course of the year. Circumstances that arise during the year may prompt OIG to undertake new, higher priority projects or reduce the priority of a planned project. Some topics on the Annual Plan may be deferred to following years. In addition, a project on the Annual Plan that originally begins as an audit may instead be completed as an OIG advisory, department notification, or other non-audit report, or terminated if OIG determines that further work will not bring substantial benefit to the City or is not cost effective for OIG.

B. DEPARTMENTAL ACTION

OIG encourages City departments to proactively assess any program included on the Plan and to alert OIG to any corrective action taken in advance of and/or during an APR performance audit. Such action will not necessarily deter APR from auditing the program, but the audit will assess and report on any proactive and promptly reactive measures the department has taken.

C. PROCESS

The Annual Plan is drafted in consultation with the Inspector General and senior OIG staff, with final approval by the Inspector General. OIG publishes a draft of the Annual Plan for public comment each September, and reviews, updates, and publishes the final Plan in December.

III. SELECTION OF TOPICS FOR INCLUSION IN THE ANNUAL PLAN

A. TOPIC SOURCES

OIG gathers potential audit topics from a variety of sources, including: complaints received from the public via the OIG tip line; suggestions from governmental leadership; past OIG reports; OIG investigations; OIG staff knowledge; other governments' performance audits, audited financial statements, internal audits, and risk assessments; new City initiatives; program performance targets and results; public hearings and proceedings; and public source information, including media, professional, and academic reports and publications.

This year for the first time we distributed an electronic survey soliciting feedback on the Draft 2020 Plan published for public comment on September 30, 2019. We received 455 responses, which informed our selections for the final plan. We encourage the public to submit suggestions anytime through the OIG website:

igchicago.org/contact-us/help-improve-city-government/

B. PRIORITIZATION CRITERIA

OIG considers numerous factors in selecting projects for the Annual Plan, including preliminary risk assessments of the programs or services involved in potential new project topics; the unique value a potential project might bring to City stakeholders; and the availability of APR resources, taking into account resources required to conduct follow-ups on past reports.

1. RISK ASSESSMENT

A risk factor is an observable and/or measurable indicator of conditions or events that could adversely affect an organization, absent effective internal controls. APR's assessment of topics is based on risk factors reflecting the nature and potential vulnerabilities of departments, programs, and vendors. APR considers a variety of risk factors, such as,

- Resources used to deliver service
 - Size (in dollars budgeted) of department/program
 - Number of staff working in department/program
- Public interest/impact
 - Critical to City's mission or core service provision
 - Affects public health or safety
 - Affects vulnerable populations
- Number of residents, employees, and/or businesses affected/served
 - Quality/quantity of service provision

- Customer satisfaction
- Compliance with laws, regulations, or policies
- Volume, type, and dollar amount of financial transactions
- Quality of internal control systems, including,
 - Existence of robust operational policies and procedures
 - Existence and use of performance metrics
- Underfunded mandate or mismatch between program objectives and available resources

APR assesses risk based on discussions with departments and leadership, information requested from departments, information obtained from prior OIG work, publicly available information, and additional research. In some cases, OIG selects a project because there is a preliminary indication of specific program vulnerabilities. In other cases, OIG selects a project where there is little or no indication of program vulnerabilities, but the public and governmental leadership would benefit from independent evaluation and assurance that the program is working well.

2. OIG ROLE AND VALUE ADDED

OIG seeks to add unique value arising from its role as the City's independent oversight agency by prioritizing APR projects that,

- analyze performance of governmental operations and programs where analysis requires data and information not available to external entities;
- analyze governmental operations and programs where no recent independent analysis exists;
- develop knowledge of the operation of municipal programs and services; and/or
- analyze narrow, obscure, or complex aspects of municipal operations that receive little attention (in addition to broad scope topics).

In addition, OIG strives to ensure that the selection of projects provides coverage across the full spectrum of governmental functions and services.

3. FOLLOW-UP ON PAST APR REPORTS

APR evaluates each completed audit six months after publication to determine whether, when, and how to conduct follow-up. Factors considered in determining what, if any, follow-up action to take include the nature of the original findings and recommendations, changes in management or staff structure, and external circumstances affecting the department. For example, APR may decide to postpone follow-up for an additional six months, conduct another

full audit with complete re-testing, or simply request and evaluate documentation of corrective actions from management.

Follow-up reports are an essential part of the oversight process because they enable OIG to evaluate the actions taken by a department or agency to address problems identified in the original audit report. For that reason, they take the highest priority when planning the activities of APR personnel.

4. AVAILABLE STAFF RESOURCES

The number, experience, and specific expertise of staff available to APR affect the selection of project topics and their scope. APR will not undertake projects unless OIG has the required competencies available among its personnel or can procure them from external sources. APR will request assistance from other OIG staff when their specialized expertise (e.g., legal or data analysis) may benefit a project, and will adhere to all GAS requirements for the use of such internal specialists.

To maximize their utility, performance audits must be timely. Unexpected delays caused by an auditee, such as slow responses to APR requests, or problems with the quality of program data, are noted as findings or limitations in published audit reports. Proper planning requires the Deputy Inspector General and Chief Performance Analysts to assign adequate staff—or, if necessary, reduce audit scope—to ensure timely completion of all projects.

IV. 2020 NEW PROJECTS

As projects are completed and staff become available, APR reviews the topics on the Annual Plan and conducts additional research prior to launch. (“Launch” is the official opening of an audit with a department.) The final decision to launch a project requires approval by the Inspector General on a just-in-time basis, because circumstances affecting the decision of whether or when to launch a specific project are expected to change throughout the year.

APR groups the 20 potential project topics listed below into 5 broad categories corresponding with the functions and departments presented in the City’s Annual Appropriation Ordinance, Summary E.² We do not rank the topics. The numbers below are provided solely for ease of identification.

POTENTIAL OBJECTIVES:	<i>Potential questions the project will seek to answer. APR refines the objectives after obtaining more information about the topic from the department.</i>
RATIONALE:	<i>Relevance of and background on the topic.</i>

A. CITY DEVELOPMENT AND REGULATORY

1. DEPARTMENT OF BUILDINGS (DOB) PERMIT ISSUANCE AND INSPECTIONS

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Does DOB perform all field inspections required as part of the permitting process? Does DOB collect all permit issuance and inspection fees, as required by the Municipal Code of Chicago (MCC)?
RATIONALE:	OIG has learned that DOB may not be completing all field inspections related to building permits, which raises safety and fairness concerns. Regarding fees, OIG’s 2014 Elevator Inspections Audit revealed that DOB failed to collect fees for 18% of elevator inspections over a one-year period. This audit will determine whether this failure to collect fees also exists in the permitting context.

² For the City’s Annual Appropriation Ordinances, see https://www.cityofchicago.org/city/en/depts/obm/supp_info/annual-budget-recommendations---documents.html. OIG also has oversight duties relating to operation and projects of the Public Building Commission (PBC). Planned audits of PBC activity are included in the Infrastructure category.

2. DOB ADVERTISING BILLBOARD PERMIT ENFORCEMENT

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none">• Does DOB effectively enforce the Municipal Code of Chicago (MCC) provisions regarding off-premise signs (advertising billboards)?• Does DOB collect all off-premise sign fees, and remove illegal billboards, as required by the MCC?
RATIONALE:	OIG has learned that DOB may not be consistently enforcing the municipal code provisions regarding advertising billboards. This audit will determine whether the City is enforcing the permit requirements and fines for illegal billboards.

3. DEPARTMENT OF BUSINESS AFFAIRS AND CONSUMER PROTECTION (BACP) ENFORCEMENT OF THE SHARED HOUSING ORDINANCE

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none">• Does BACP ensure that all shared housing units and vacation rentals are registered under the Shared Housing Ordinance?• Does the City collect shared housing hotel tax surcharges and dedicate a portion of the revenue to homeless services and domestic violence victim support, as required by MCC?
RATIONALE:	The City's Shared Housing Ordinance requires homesharing (e.g., Airbnb) hosts and similar short-term residential rental operators to register with the City. The Ordinance also requires hosts to remit surcharges, on top of the hotel tax, earmarked to fund homeless services and domestic violence victim support. This audit will determine whether BACP is effectively enforcing the registration requirement and whether the surcharge revenues are used for the purposes set forth in the Ordinance.

B. COMMUNITY SERVICES

1. CONSTRUCTION AND DEMOLITION DEBRIS RECYCLING

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Does the Chicago Department of Public Health (CDPH) ensure that all contractors required by the MCC to recycle construction and demolition debris meet the requirement? Does the Department of Buildings (DOB) withhold certificates of occupancy for contractors who have not demonstrated their compliance with the recycling requirement or paid related fees?
RATIONALE:	According to a 2010 report commissioned by the former Chicago Department of Environment, roughly 60% of the 7.3 million tons of waste generated annually in Chicago is construction and demolition debris. ³ Effective enforcement of the construction and demolition debris recycling requirement has a significant impact on the total amount of waste recycled in Chicago.

2. DEPARTMENT OF FAMILY AND SUPPORT SERVICES (DFSS) STRATEGIC FRAMEWORK

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Is DFSS following new processes for selecting and monitoring delegate agencies, pursuant to the Department's new Strategic Framework?⁴ Is the DFSS Strategic Framework producing the intended results?
RATIONALE:	In 2016, DFSS launched a Strategic Framework to guide its transition to a data- and outcome-driven model for serving clients. As part of the Strategic Framework, the Department focused on Strategic Contracting—holding delegate agencies more accountable for performance. This audit will evaluate the extent to which these changes are producing the intended results.

³ City of Chicago, Department of Environment, "Waste Characterization Study" (prepared by CDM), ES-8, April 2, 2010, accessed December 6, 2019, https://www.chicago.gov/content/dam/city/depts/doe/general/RecyclingAndWasteMgmt_PDFs/WasteAndDiversionStudy/WasteCharacterizationReport.pdf.

⁴ City of Chicago Department of Family and Support Services, "Commitment to Outcomes," accessed December 6, 2019, https://www.chicago.gov/city/en/depts/fss/supp_info/departments-strategic-framework.html.

C. FINANCE AND ADMINISTRATION

1. MBE, WBE, DBE, AND BEPD GOAL ACHIEVEMENT

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Do the City's efforts to increase the participation on City contracts of businesses owned by women, minorities, persons with disabilities, and other traditionally disadvantaged groups align with best practice strategies in other cities? Is the City meeting its goals for MBE, WBE, DBE, and BEPD participation on City contracts? Does the Department of Procurement Services (DPS) take sufficient steps to ensure the reliability of the data it uses to monitor compliance with MBE, WBE, DBE, and BEPD requirements in City contracts?
RATIONALE:	The City has a variety of MBE, WBE, DBE, and BEPD outreach programs and contracting incentives. This audit will assess whether these efforts increase the capacity of these businesses to compete for municipal contracts.

2. CITY BUDGET DEVELOPMENT PROCESS

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Does the City's budget development process adhere to best practices, including those for public engagement?
RATIONALE:	The Government Finance Officers Association (GFOA) identifies best practices for budgetary policies, processes, and public engagement. This audit will evaluate the City's budget development process against GFOA guidance.

3. CITY COUNCIL COMMITTEE EXPENDITURES

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Do City Council Committees comply with municipal code requirements regarding committee budgets, expenditures, and personnel usage?
RATIONALE:	Recent OIG work and investigative reporting have highlighted instances of City Council committees overspending their budgets, making questionable purchases, and assigning committee staff to work for individual aldermen.

4. CITY DATA QUALITY

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> How can the City ensure that it collects and effectively organizes complete and accurate data related to municipal operations?
RATIONALE:	Multiple OIG audits have encountered incomplete, inaccurate, or otherwise unusable data in City files and databases, which hinders the City's ability to deliver services and measure performance. This advisory will compile examples and suggest ways the Mayor's Office may drive better data quality in the City.

5. MUNICIPAL DEPOSITORY REPORTING AND PLEDGE COMPLIANCE

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Does the Department of Finance (DOF) enforce the municipal code provisions requiring banks that hold City money to report lending and deposit information, and sign pledges promising to abstain from discriminatory and predatory lending practices?
RATIONALE:	Over \$1.0 billion in City cash and certificates of deposit is held by banks designated as municipal depositories. The municipal code requires these banks to pledge that they will not participate in discriminatory lending, and to disclose lending and deposit information to the City. This audit will determine if these municipal code provisions are being enforced.

6. WORKERS COMPENSATION PROGRAM

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Has the City implemented recommendations made by Grant Thornton in its 2019 audit of the workers' compensation program?
RATIONALE:	The City hired Grant Thornton to review the workers' compensation program in early 2019 and make recommendations to improve the program's legal compliance, fraud prevention, and efficiency. This report will follow up on the recommendations to determine whether the City has implemented them.

D. INFRASTRUCTURE

1. LEAD WATER SERVICE LINE MITIGATION

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Does the City have a long-term plan to remove lead water service lines, or otherwise mitigate their effects on household water quality?
RATIONALE:	Based on data provided by the City of Chicago to the Illinois Environmental Protection Agency (IEPA), approximately 75% of all service lines in Chicago are made of lead. ⁵ In December 2018, the Department of Water Management (DWM) announced that it had commissioned a report to explore replacing lead service lines, but that report has not been released. ⁶ After a study found increased lead levels in homes with water meters, the City suspended new water meter installations in July 2019 and expanded its provision of water filter pitchers to metered homes. This advisory will examine the City's long-term plans regarding lead service lines.

⁵ Illinois Environmental Protection Agency, "Lead Service Line Information," accessed July 7, 2019, <https://www2.illinois.gov/epa/topics/drinking-water/public-water-users/Pages/lead-service-line-information.aspx>.

⁶ City of Chicago, Department of Water Management, "Chicago Department of Water Management Announces Plans to Explore Lead Service Line Replacement," December 20, 2018, accessed September 13, 2019, https://www.chicago.gov/city/en/depts/water/provdrs/commis/news/2018/December/lead_service_line_replacement.html.

2. PUBLIC BUILDING COMMISSION (PBC) GREEN ENERGY SYSTEMS

- POTENTIAL OBJECTIVE:
- Do the buildings PBC constructs for the City of Chicago meet the City's goals for energy efficiency and cost savings?
- RATIONALE:
- As part of its sustainability efforts, the City seeks to install green energy systems in municipal buildings. Building users have complained that the systems operate poorly and do not achieve the intended energy savings.

3. DEPARTMENT OF STREETS AND SANITATION (DSS) STREET SWEEPING EFFICIENCY

- POTENTIAL OBJECTIVES:
- Do DSS's street sweeping routes maximize the effectiveness and efficiency of street sweeping city-wide?
- RATIONALE:
- Historically, DSS has organized street sweeping routes on a ward basis, generally assigning one sweeper to each ward and using laborers to hang temporary "No Parking" signs. Given the significant size differences among wards, this approach results in some streets being swept more often than others.

4. CHICAGO DEPARTMENT OF TRANSPORTATION (CDOT) STREET RESURFACING AND MAINTENANCE

- POTENTIAL OBJECTIVES:
- Does CDOT manage streets in a cost-effective way that extends pavement life?
- RATIONALE:
- In a 2015 audit, OIG found that CDOT's pavement management program did not meet federal guidelines and lacked sufficient street condition data, relying on constituent complaints and visual inspections instead. The audit also found that the City could save \$4.6 million annually by reallocating money from resurfacing to preventive maintenance. Poor street condition continues to be a concern to roadway users. This audit will re-examine the City's pavement management program.

5. WATER BILLING EXEMPTIONS

- POTENTIAL OBJECTIVES:
- Do the Departments of Water Management (DWM) and Finance (DOF) effectively enforce the municipal code provisions regarding nonprofit organizations' eligibility for water fee exemptions?
- RATIONALE:
- The Municipal Code (MCC § 11-12-540) exempts certain nonprofit organizations from part or all water and sewer fees. Eligibility is determined, in part, by the organization's net assets. This audit will evaluate whether the City

is properly determining eligibility based on the organization that owns the property.

E. PUBLIC SAFETY

1. CHICAGO FIRE DEPARTMENT (CFD) FIRE PREVENTION INSPECTIONS

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Does CFD's Fire Prevention Bureau conduct all annual inspections required by the Municipal Code of Chicago? Does CFD notify noncompliant building owners and conduct timely follow-up inspection of known violations?
RATIONALE:	The inspection of buildings for adherence to the fire code and timely correction of violations is a critical component of public safety. CFD does not currently publish fire inspection activity on the City's Data Portal.

2. CHICAGO FIRE DEPARTMENT (CFD) RESPONSE TIMES

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Do CFD's response time goals for fire and medical emergency response, respectively, meet state and national standards? Are there significant differences in response time across neighborhoods?
RATIONALE:	A 2013 OIG audit found that CFD was not meeting the response times for National Fire Protection Association (NFPA) Standard 1710, which it had historically claimed to meet or exceed. This audit will re-examine CFD fire suppression and medical response times.

3. CHICAGO EMERGENCY TELEPHONE SYSTEM BOARD (ETSB) ADMINISTRATION OF EMERGENCY TELEPHONE SYSTEM FUND (ETSF)

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none"> Does ETSB properly account for and report all ETSF revenues and expenditures to the State? Are ETSF funds spent only on allowable expenses?
RATIONALE:	State law allows Chicago to place a surcharge (currently \$5.00 per month) on each landline and cellular phone service provided that the funds are spent only on specific costs enumerated by state statute. The State previously had concerns about the City's expenditures from the fund, ⁷ which collected \$131.2

⁷ Fran Spielman, "Emanuel and Rauner Continue Squabbling Over Phone-Tax Increase," *Chicago Sun-Times*, June 23, 2017, accessed September 3, 2019, <https://chicago.suntimes.com/news/rahm-emanuel-rips-bruce-rauner-for-threatening-phone-tax-veto/>.

million in 2018.⁸ This audit will assess the ETSB's accounting for revenues and expenditures.

4. CHICAGO POLICE DEPARTMENT (CPD) DASHBOARD CAMERAS

POTENTIAL OBJECTIVES:	<ul style="list-style-type: none">• Does CPD manage and maintain dashboard cameras and footage in an effective manner?
RATIONALE:	In late 2015, responding to high-profile cases that revealed police officers' widespread failure to activate their vehicles' on-board video and audio recording devices, CPD committed to enforcing policies requiring proper use of the equipment. Failure to properly use video and audio equipment hinders investigations and undermines public trust in law enforcement.

⁸ City of Chicago, Office of Budget and Management, 2020 Budget Forecast, 39, accessed September 4, 2019, https://www.chicago.gov/content/dam/city/depts/obm/supp_info/2020Budget/2020-Budget%20Forecast.pdf.

V. REPORTS PUBLISHED IN 2019

APR published the following 17 reports in 2019 (*as of December 20, 2019*). All are available at igchicago.org.⁹

A. CITY DEVELOPMENT AND REGULATORY

1. DEPARTMENT OF PLANNING AND DEVELOPMENT AFFORDABLE REQUIREMENTS ORDINANCE ADMINISTRATION FOLLOW-UP INQUIRY (#18-0859)

PUBLICATION

DATE: February 19, 2019

SUMMARY: OIG completed a follow-up to its March 2017 audit of the Department of Planning and Development's (DPD) administration of the Affordable Requirements Ordinance (ARO). That audit found that, the City lacked an evidence-based strategy to define high and low opportunity areas and allocate ARO fees accordingly. Additionally, OIG determined that Chicago Community Land Trust (CCLT) has never been sufficiently funded to achieve its mission of acquiring land for the creation of affordable housing units. The scope of the audit included the 2003 and 2007 versions of the Ordinance, but it did not include the 2015 ARO amendments, which addressed some of OIG's recommendations.

OIG recommended that DPD develop defined goals relating to the geographic distribution of affordable housing, and that, as part of this work, the Department assess and formalize the city's high opportunity areas for affordable housing development. OIG recommended that DPD incentivize affordable housing development in these areas and monitor outcomes on an ongoing basis to ensure that it meets its geographic distribution goals. Regarding CCLT, OIG recommended that DPD and CCLT work with City Council and the Office of Budget and Management to secure the financial resources necessary for CCLT to function as a community land trust.

DPD, working with the DePaul Institute for Housing Studies, used household income data from the U.S. Census Bureau to define three categories of housing zones—Higher Income, Low-Moderate Income, and Downtown—pursuant to the 2015 ARO, but has not set numerical goals relating to these zones. CCLT has now hired an executive director, increased the number of units in its portfolio, and made efforts to fundraise externally. However, it has

⁹ OIG audit reports and advisories are published in full on the web site. OIG notifications and minor inquiries are summarized in OIG's quarterly reports.

declined to undertake additional steps OIG recommended to better align its operations with its organizational name and mission.

2. AUDIT OF DELAYS IN PROVIDING NOTICE OF SANITATION CODE VIOLATIONS (#18-0771)

PUBLICATION

DATE: September 4, 2019

SUMMARY: OIG audited the Department of Law's (DOL) process for notifying people of sanitation code violations cited by the Department of Streets and Sanitation, such as overflowing garbage containers or uncut weeds. The Collections, Ownership, and Administrative Litigation (COAL) division of DOL is responsible for identifying the owners of properties cited by DSS for such violations. Once COAL verifies the correct owner, it sends a notice of violation. The objective of the audit was to determine the average number of days from alleged violation to notification and why, in some cases, the process took more than a year.

For sanitation code violations that occurred in 2016 and 2017, DOL notified property owners an average of 289 days—more than 9 months—after the alleged violation. In 63.2% of cases, it took DOL 6 to 12 months to notify property owners and, in 23.8% of cases, DOL did not provide notice until a year or more had passed. Fewer than 2% of notifications were sent within one month of the violation.

OIG concluded that the average 9-month delay in notification was due primarily to DOL's large backlog of alleged sanitation code violations. Once COAL staff are assigned a violation, it took just a few days to identify the property owner and send the notice.

DOL disagreed with our recommendation to establish a performance measure related to the timeliness of notification. The Department disputes that such a performance measure is "reasonable, appropriate, or even operationally feasible [...]." DOL also disagreed with OIG's recommendations regarding ways to further reduce large volume of "untouched" violations and address the seasonal increase.

3. DEPARTMENT OF BUILDINGS COMPLAINT-BASED INSPECTIONS AUDIT FOLLOW-UP INQUIRY (#19-0589)

PUBLICATION

DATE: November 19, 2019

SUMMARY: OIG completed a follow-up to its April 2018 audit of the Department of Buildings' (DOB) complaint-based inspection operations. The purpose of the audit was to determine whether the Department met required deadlines for

responding to building complaints, whether it effectively prioritized such complaints, and whether the records of building code violations available to the public are complete and accurate. Our audit found that DOB did not have effective strategies for prioritizing complaint-based inspections, resulting in potential health and safety hazards going unaddressed for longer than allowed by the Municipal Code. We also found that the City's websites did not provide the public with a property's complete violation history. OIG recommended that DOB address open and overdue emergency complaints, develop policies for responding to building complaints in a manner that complies with requirements in the Municipal Code, adopt inspection and complaint monitoring reports, and work with the Department of Innovation and Technology (DoIT) to provide complete and accurate data to the public through DOB's public data sources. In response to the audit, DOB described corrective actions it would take.

In June 2019, OIG inquired about the status of the corrective actions taken by DOB. Based on the Department's responses, OIG concludes that DOB has partially implemented corrective actions related to the audit findings.

DOB has completed a staffing analysis as part of its 2020 budget requests, updated data headings on its publicly available data sources, and addressed all open and overdue emergency complaints. DOB also worked with the Department of Law to amend the Municipal Code to remove complaint response deadlines, so it is no longer non-compliant with the Code. In addition, DOB used the City's new 311 system to develop monitoring reports. However, the Department has not implemented corrective actions based on OIG's other recommendations made in the 2018 audit. Specifically, DOB has not documented standardized data entry and complaint prioritization protocols, fixed known issues with the filtering and reporting logic of the Department's publicly available data sources, or worked with DoIT to rollout mobile, electronic inspections to all inspection bureaus. Moreover, there are data conversion errors in DOB's inspection record data that occurred when the City moved to a new 311 system, and the Department had a backlog of 1,855 open, overdue complaints as of October 23, 2019.

4. CHICAGO LOW-INCOME HOUSING TRUST FUND HOUSING QUALITY STANDARDS COMPLIANCE PROCESS AUDIT (#18-0001)

PUBLICATION

DATE: December 12, 2019

SUMMARY: OIG conducted an audit of the Chicago Low-Income Housing Trust Fund's management of housing quality inspections (HQS) for units participating in the Rental Subsidy Program (RSP) in 2017.

OIG concluded that the Trust Fund did not ensure that all properties participating in the RSP met its standards for safe, sound, and secure housing in 2017. Specifically, 45.8% of RSP properties did not meet minimum HQS standards, and 61.4% did not meet Chicago Building Code requirements. The Trust Fund overpaid \$30,703 to at least six properties in 2017 and \$6,120 to at least one in 2018. In addition, the Trust Fund did not maintain complete documentation of known lead hazards, City Building Code violations, and local court action against subsidized properties. Finally, OIG found that the Trust Fund could not accurately gauge the amount of funding it had allotted to RSP properties, and published inaccurate and incomplete quarterly reports from 2014 through 2018. It under-reported its total funding commitments by \$295,680 in 2017 alone.

OIG recommended that the Trust Fund develop a contracting, inspection, and payment process sufficient to ensure that it only subsidizes well-maintained housing for low-income Chicagoans; review prior payments to identify any mistakes ; and immediately resolve errors in its property records to ensure accurate reporting. The Trust Fund agreed with the audit findings and committed to merging its inspection, document submission, and payment systems; updating its property inventory to reflect accurate records; and “completely revamping” its reporting.

B. COMMUNITY SERVICES

1. CHICAGO PUBLIC LIBRARY STAFFING AUDIT FOLLOW-UP INQUIRY (#19-0001)

PUBLICATION

DATE: May 7, 2019

SUMMARY:

OIG completed a follow-up to its May 2018 audit of the Chicago Public Library’s (CPL) staffing plan. The purpose of that audit was to determine whether CPL’s staffing plan followed industry guidance and constituted an effective and efficient tool for allocating human resources among libraries. Our audit found that CPL’s staffing plan did not optimally align library staffing with community needs. OIG recommended that CPL conduct a staff workload analysis to determine the amount of time employees in each job classification spent on each of their activities. OIG also recommended that CPL involve stakeholders such as its Board of Directors, library employees, and community members in redesigning its staffing plan around factors that will ensure libraries are appropriately staffed to meet community needs. For the staffing plan, OIG recommended that CPL replace qualitative descriptors with numeric ranges for factors that are quantifiable. OIG also recommended that after CPL redesign the staffing plan, it should consistently and completely apply the

factors to allocate the appropriate staff to each library location. Finally, CPL should develop a process to evaluate the effectiveness of the staffing plan on a periodic basis and should modify it as needed to adjust to changes in library services and community needs.

CPL stated it has chosen not to conduct a staff workload analysis to understand the amount of time staff spend on specific activities. CPL simplified the staffing plan by removing hybrid library classifications, but has not quantified factors where possible, and still declines to involve the CPL Board of Directors, library employees, and community members in redesigning the plan. CPL has not yet reviewed the categorization of libraries within the staffing plan or developed a formal process for evaluating the plan's effectiveness. It expects to start those processes in the third quarter of 2019. Then, in the fourth quarter, CPL intends to create a policy to codify how and when the staffing plan should be applied, evaluated, and updated.

2. CDPH AIR POLLUTION ENFORCEMENT AUDIT (#17-0525)

PUBLICATION

DATE: September 16, 2019

SUMMARY:

OIG assessed how well the Chicago Department of Public Health (CDPH) monitors facilities that pollute the air. We found that the CDPH was not meeting its internal air-quality inspection frequency goals and was not ensuring that facilities annually renew their required Certificates of Operation. Between 2015 and 2017, CDPH met its inspection frequency goal for only 17% of the facilities it intended to visit annually. In 2017, only 48% of the facilities in CDPH's inspection and permit system obtained the required Certificate of Operation. CDPH agreed with OIG's recommendations to strengthen its permit and inspection program by developing inspection priorities and goals based on factors such as public health data and violation patterns. The Department also agreed to develop a Certificate of Operation enforcement system that takes advantage of the Department's current data to ensure facilities renew on time and pay the correct amount.

We also found that CDPH did not ensure that violations identified by inspectors were corrected. Of the 30 violation warnings the Department issued from September 2017 to September 2018, we found that 12 went unresolved. The Department agreed with OIG's recommendation to adjust its process to ensure that violation warnings are monitored by supervisors and addressed by inspectors in a timely manner.

C. FINANCE AND ADMINISTRATION

1. AUDIT OF THE OPERATIONS OF THE CHICAGO BOARD OF ELECTION COMMISSIONERS (#16-0291)

PUBLICATION

DATE: January 29, 2019

SUMMARY:

OIG audited the financial and human resource operations of the Chicago Board of Election Commissioners (CBOEC). CBOEC is responsible for conducting all elections within the City of Chicago per the State Election Code, and is funded by both the City of Chicago and Cook County. Although CBOEC challenged OIG's jurisdictional authority, OIG completed the audit pursuant to its designation as an independent, external auditor by the Chief Judge of the Cook County Circuit Court.

OIG found significant gaps in CBOEC's financial administration related to vendor payments, cost allocations, budgeting, employee reimbursements, payroll, contract procurement, and cash management. Although CBOEC was informed of many of these gaps in May 2009, CBOEC did not implement many of the corrective actions it committed to undertake. OIG also found that CBOEC did not fulfill its obligations under the Patient Protection and Affordable Care Act (ACA), budget accurately for its personnel needs, have transparent hiring or promotional practices, or have succession plans for leadership and other critical positions. Lastly, OIG found that CBOEC does not have a contingency plan effectively designed to maintain continuity of operations in the event of attack or disaster.

We recommended that CBOEC undergo regular independent audits, develop and publish financial policies, develop accurate budgets, ensure that its purchasing department is included in all procurement activities, and correct outstanding financial inaccuracies. We also recommended that CBOEC immediately come into compliance with the ACA; conduct a staffing analysis and reach an agreement with the City regarding acceptable budgeting for hourly employees; develop standardized and transparent hiring, compensation, and performance management policies; develop succession plans for staff turnover; and develop a contingency plan that meets best practices. In response to our audit findings and recommendations, CBOEC stated that it tentatively agrees with some recommendations, disagrees with others, and is still determining its response to others. CBOEC stated its intent to provide a final response to the audit by May 31, 2019, but no such response was provided.

2. DEPARTMENT OF HUMAN RESOURCES TIME-TO-HIRE INQUIRY (#18-0878)

PUBLICATION

DATE: Summarized in April 16, 2019 OIG First Quarter Report

SUMMARY: In November 2018, OIG requested an update from the Department of Human Resources (DHR) on its progress developing goals and measures for the time it takes to hire a City employee. OIG undertook this inquiry in relation to our 2015 audit of the timeliness of the City's processes for filling employment vacancies. The 2015 audit found that the City lacked official performance goals for how long the full hiring process should take, did not track the time-to-hire for vacancies, and took an average of six months to fill vacant positions.¹⁰

In response to the audit, DHR and the Office of Budget and Management (OBM) described several corrective actions they would take regarding the development, tracking, and analysis of performance goals. They disagreed with OIG's other findings and recommendations, and declined to take corrective actions.

In 2017, OIG followed-up with DHR and OBM, and concluded that the City had begun implementation of corrective actions related to performance measures, but still disagreed with our other recommendations.¹¹

In January 2019, DHR responded to OIG's update request by describing its efforts to develop time-to-hire goals and tracking methods. Based on that response, OIG concludes that the City is still working to identify a tracking method that meets its needs and set time-to-hire goals. Specifically, DHR has (a) piloted a tracking tool (which was ultimately determined insufficient for the Department's needs); (b) partnered with a subset of departments to regularly prioritize, set goals for, and provide a status of each hiring sequence, with the intention of expanding these activities to all departments in 2019; (c) established working groups responsible for review of the hiring process, including the identification of bottlenecks; and (d) developed a list of characteristics required of an ideal tracking tool. Regarding (d), DHR stated that if it determines the City's existing technology can be adapted to serve its needs, it will make a recommendation on next steps in April 2019. If not, DHR and OBM will consider procuring a new, external technological solution. Once a tracking tool is implemented, DHR will work with OBM to develop time-to-hire goals and identify process improvements. OIG concludes that the City is

¹⁰ City of Chicago Office of Inspector General, *Department of Human Resources and Office of Budget and Management Hiring Timeliness Audit*, December 22, 2015, available at <https://igchicago.org/wp-content/uploads/2015/12/City-Hiring-Timeliness-Audit-.pdf>.

¹¹ City of Chicago Office of Inspector General, *Department of Human Resources and Office of Budget and Management Hiring Timeliness Follow-Up Inquiry*, July 6, 2017, available at <https://igchicago.org/wp-content/uploads/2017/07/City-Hiring-Timeliness-Audit-Follow-Up.pdf>.

still working to identify a tracking method more than three years after the original recommendation.

3. INQUIRY REGARDING THE STATUS OF THE TAX INCREMENT FINANCING REFORM PANEL RECOMMENDATIONS (#19-0197)

PUBLICATION

DATE: June 3, 2019

SUMMARY: OIG completed an inquiry into the City's implementation of the recommendations issued in 2011 by the Tax Increment Financing (TIF) Reform Panel. In May 2011, Mayor Emanuel announced the formation of a TIF Reform Panel tasked with making recommendations to bring transparency, accountability, and efficiency to the TIF system.

Based on the response from Mayor Emanuel's Office, OIG found that the City implemented some of the Panel's recommendations, but more remains to be done. Specifically:

- The City's economic development plan and Capital Improvement Plan did not satisfy panel recommendations.
- Many TIF metrics are not available online and the City does not publish thorough justifications that private development would not occur without TIF funding.
- The City did not establish performance thresholds for strategic review.
- The City's internal TIF oversight body does not have any documented responsibilities, leadership, authority, or accountability.

OIG urged the new mayoral administration to revisit the recommendations that were not fully implemented by the outgoing administration.

4. AUDIT OF THE DEPARTMENT OF INNOVATION AND TECHNOLOGY'S INFORMATION TECHNOLOGY INVESTMENT MANAGEMENT (#17-0638)

PUBLICATION

DATE: December 19, 2019

SUMMARY: OIG evaluated the Department of Innovation and Technology's (DoIT) management of the City's investment in information technology. DoIT is responsible for ensuring that the City's technology infrastructure meets the needs of City departments and residents.

Effective management of an IT portfolio requires consistent and repeatable organizational processes.

We determined that DoIT did not consistently adhere to best practices for project selection, which increased the risk of projects delivering fewer benefits, costing more, and/or taking longer than expected to complete. In addition, DoIT's data collection practices hamper effective monitoring and evaluation of project and portfolio performance, thereby limiting the Department's ability to identify opportunities for improvement.

OIG recommended that the Department follow internal policies and industry best practices with respect to project selection, monitoring, and evaluation. These recommendations include completing internal documents to guide these activities, requiring all project managers to follow these policies consistently, and empowering governing committees to meet mandates for project oversight. Project oversight should include evaluation of outcomes and long-term performance in order to inform the Department's future decision making at the proposal stage.

DoIT agreed with these recommendations and stated that it has undertaken several policy and process changes in order to address these findings.

D. INFRASTRUCTURE

1. CHICAGO DEPARTMENT OF TRANSPORTATION MANAGEMENT OF CONSTRUCTION IN THE PUBLIC WAY AUDIT FOLLOW-UP INQUIRY (#19-0199)

PUBLICATION

DATE: June 11, 2019

SUMMARY:

OIG completed a follow-up inquiry to its January 2018 audit of the Chicago Department of Transportation's (CDOT) Management of Construction in the Public Way. Based on CDOT's responses, we concluded that CDOT has implemented some corrective actions to address the recommendations in the original audit, while others are still in progress, only partially implemented, or not implemented at all.

Specifically, CDOT has engaged with the Department of Planning and Development and Public Building Commission to improve coordination with these entities, implemented procedures to help ensure that contractors do not use emergency dig tickets to circumvent the project coordination process, and improved the way it solicits information from stakeholder agencies via their capital improvement plans, though it still does not collect five-year plans from each agency. CDOT has begun to address the gap between its mandate to inspect all public way restorations and its inspection staff's capacity but has not been allocated resources to significantly expand this function. It has begun to develop an electronic system to schedule, record, and track inspections and citations by associated permit, though development is still in its early stages. Lastly, CDOT still declines to assume full responsibility for residential street infrastructure planning by removing it from the Aldermanic Menu Program.

2. ADVISORY CONCERNING INEQUITIES IN CHICAGO'S RESIDENTIAL STREET INFRASTRUCTURE MANAGEMENT (#19-0492)

PUBLICATION

DATE: June 13, 2019

SUMMARY: This advisory summarized the findings of OIG's 2017 Chicago Department of Transportation Aldermanic Menu Audit and urged Mayor Lightfoot to implement the related recommendations. Specifically, the advisory noted,

- the Aldermanic Menu Program ("Menu") creates significant funding inequities, including a gap of \$9.3 million between the best- and worst-funded wards;
- Menu underfunds citywide residential infrastructure needs by \$228.8 million annually;
- the City allows alderman to spend Menu funds on projects other than residential street infrastructure; and
- the City does not follow best practices for multiyear capital planning of residential street infrastructure.

OIG suggested that the City stop funding core residential infrastructure through Menu and empower the Department to fully inhabit its infrastructure management role.

3. CHICAGO DEPARTMENT OF TRANSPORTATION COMMERCIAL DRIVEWAY BILLING AUDIT (#17-0479)

PUBLICATION

DATE: July 1, 2019

SUMMARY: OIG audited the Chicago Department of Transportation's (CDOT) billing process for commercial driveway permit annual fees to determine whether the Department accurately and completely billed commercial property owners for driveways that use the public way.

We found that CDOT either did not bill, or inaccurately billed, an estimated 6,713 permitholders, resulting in annual revenue loss between \$1.1 million and \$1.5 million. If collected, this would increase driveway permit revenue by 39-54%. In addition, the City does not actively pursue payment for driveway permit fees that are past due, resulting in at least 11,561 active permits with \$3.8 million in overdue fees in CDOT's records. Lastly, CDOT has no confidence that all relevant driveways are recorded in its current driveway permit system and is thus likely forgoing an unknown amount of additional revenue by not billing all relevant property owners.

OIG made several recommendations to help CDOT correct the data problems currently hampering billing and implement procedures to prevent such problems in the future. Also, we recommended that CDOT collaborate with the Department of Finance, the Department of Law, and other departments as necessary to include driveway permit fees in the City's standardized debt collection or verification processes.

CDOT agreed with our recommendations, committing to correct its records, collect unbilled fees, develop standardized procedures, and implement other corrective and preventive measures. CDOT also said it will collaborate with other departments to upgrade its data system and ensure that past due fees are collected.

4. ADVISORY CONCERNING THE DEPARTMENT OF STREETS AND SANITATION PROVIDING FREE GARBAGE COLLECTION TO CERTAIN NONPROFIT ENTITIES (#18-0879)

PUBLICATION

DATE: August 21, 2019

SUMMARY: An OIG advisory determined that the Department of Streets and Sanitation (DSS) was violating the Municipal Code of Chicago (MCC) by providing free garbage collection service to at least 1,182 nonprofit entities. Section 7-28-235 of the MCC, effective January 1, 2016, requires all recipients of City garbage collection service to pay \$9.50 per month. Because of DSS' noncompliance, the City is losing at least \$134,748 in garbage fees each year, totaling \$449,160 as of April 30, 2019.

Furthermore, OIG found that DSS' list of nonprofit entities receiving free garbage collection is incomplete. OIG identified 25 properties not included on DSS' list that nonetheless receive free City garbage service, and there may be many more. Finally, OIG concluded that DSS' current provision of free garbage service only to those nonprofits fortunate enough to have received it in the past is inherently unfair. It perpetuates a discretionary benefit that DSS historically granted to entities who knew to request it, or otherwise acquired it, while similarly situated nonprofits are denied this benefit and must pay for private garbage collection.

OIG suggested that DSS begin to charge all non-profits receiving City garbage collection services the mandated monthly fee, create a complete and accurate inventory of non-profits receiving City garbage services, and work with City Council to codify eligibility criteria should it continue to provide the service.

DSS reviewed the issue with the Mayor's Office and proposed offering service to all nonprofit organization that meet eligibility criteria to be established in the MCC. All non-profit entities eligible to receive collection services will also be billed the mandated monthly fee. DSS expects to implement this change in 2020. DSS also stated it will continue to review its complete garbage cart inventory for accuracy.

5. AUDIT OF THE DEPARTMENT OF FLEET AND FACILITY MANAGEMENT'S MAINTENANCE OF POLICE VEHICLES (#18-0066)

PUBLICATION

DATE: September 11, 2019

SUMMARY: OIG evaluated the Department of Fleet and Facility Management's (2FM) maintenance of the Chicago Police Department's (CPD) vehicle fleet to determine whether it was attaining 95% fleet availability and whether 2FM was performing preventive maintenance in a timely manner. 2FM maintains approximately 3,000 vehicles on behalf of CPD.

OIG determined that that 2FM's inaccurate data prevented the Department from assessing how effectively it managed the police fleet. In response to our audit findings and recommendations, 2FM stated that it has improved data quality to calculate availability.

We also found that in 2017 2FM performed only 12.9% of preventive maintenance in a timely manner, primarily due to delayed requests from 2FM for CPD to deliver vehicles to its garages. 2FM agreed with OIG recommendations that it analyze its operations to identify process improvement opportunities, and then determine if additional resources are needed. 2FM also agreed with recommendations that it improve communication, information sharing and cooperation with CPD to ensure efficient management of the police fleet. 2FM reported that it has adjusted staffing to meet maintenance demand and is working closely with CPD to ensure that it is appropriately sharing information and collaborating.

6. DEPARTMENT OF WATER MANAGEMENT PARTIAL LEAD SERVICE LINE REPLACEMENT NOTIFICATION (#19-0318)

PUBLICATION

DATE: Summarized in October 15, 2019 OIG Third Quarter Report

SUMMARY: On August 14, 2019, OIG issued a notification to the Department of Water Management (DWM) regarding the Department's practices related to partial lead service line replacements. We determined that DWM's communication with customers affected by partial lead service line replacements did not align with best practices recommended by the American Water Works Association (AWWA). The information provided to customers did not contain guidance regarding,

- the dangers of lead consumption;
- the proper flushing technique; or
- the availability of point-of-use filters certified to reduce lead levels.

During the course of our work, DWM reported that it was developing new communication materials to address these issues and provided draft copies of the materials in response to our letter. DWM stated that it would begin providing these new materials to customers in September 2019. OIG suggested that DWM also provide these materials to customers affected before September 2019. DWM stated that, based on expert recommendation and industry best practices, it will provide a separate, retroactive notice to customers affected by work conducted in the three months prior to September 2019.

OIG also determined that DWM departs from best practices recommended by AWWA by not using dielectrics to connect new copper pipe to existing lead pipe when a connection is broken. AWWA recommends the use of dielectrics to reduce the corrosion of the lead caused by contact with copper. Instead, DWM uses brass lead packs to separate these materials. DWM stated that it had piloted the uses of AWWA-recommended dielectrics but had identified issues with installation and defrosting, which led the Department to determine that brass lead packs were a superior choice.

Finally, DWM said that it is conducting field studies (gathering data from the water system) and pipe loop studies (conducted in a controlled environment at the City's water treatment plants) to evaluate the effects of a variety of materials and construction techniques on lead levels. OIG suggested that DWM publish this work in a manner accessible to the public and disseminate information to keep residents informed about actions the City is taking to address reasonable concerns about lead contamination. DWM responded that these studies are still underway and it did not want to release results prematurely, but that it would release conclusions once complete data had been analyzed, verified, and reviewed.

7. PUBLIC BUILDING COMMISSION CONSTRUCTION CHANGE ORDERS AUDIT FOLLOW-UP INQUIRY (#19- 0765)

PUBLICATION

DATE: November 26, 2019

SUMMARY: OIG completed a follow-up to its June 2018 audit of the Public Building Commission of Chicago's (PBC) change order review and approval process. The purpose of the audit was to determine if PBC could provide reasonable assurance to its clients that change orders—i.e., agreements between contractors and clients authorizing departures from originally-approved contract terms—were justified and reasonably priced. Our audit found that while PBC designed a robust change order process, ineffective implementation of the process permitted errors and inconsistencies in the recording of information and recovery of damages. OIG recommended that PBC improve its change order review and approval process and revise and implement its Errors and Omissions (E & O) damage recovery policy.

In response to the audit, PBC described several corrective actions including standardized electronic cost proposal forms, internal change order trainings, and a comprehensive revision of its E & O Manual.

In August 2019, OIG inquired about corrective actions taken by PBC. Based on PBC's follow-up response, OIG concluded that PBC substantially implemented corrective actions related to the finding that the Commission could not assure its clients all increases in project costs were justified and reasonable. OIG based this conclusion on the PBC's implementation of standardized change order forms, trainings, and procedures, and its progress toward the adoption of an electronic change order tracking system. In addition, OIG concluded that PBC partially implemented corrective actions related to the finding that the Commission could not provide adequate assurance it properly pursued recoverable damages attributable to architect errors. OIG reached this conclusion due to the progress toward the comprehensive update of PBC's E & O Manual and the strengthening of procedures to assess and communicate E & Os.

E. PUBLIC SAFETY

None

VI. FOLLOW-UP REPORTS TO CONDUCT IN 2020

The following published reports will be evaluated for follow-up in 2020. APR first considers a report for follow-up six months after publication. Follow-up may be postponed until 12 or more months after report publication depending on the nature and scope of corrective actions required. Summaries of the original reports are in the previous and following sections of this Plan.

1. CDOT Commercial Driveway Billing Audit (published July 1, 2019)
2. Audit of Delays in Providing Notice of Sanitation Code Violations (published September 4, 2019)
3. Audit of the Department of Fleet and Facility Management's Maintenance of Police Vehicles (published September 11, 2019)
4. CDPH Air Pollution Enforcement Audit (published September 16, 2019)
5. Chicago Low-Income Housing Trust Fund Housing Quality Standards Compliance Process Audit (published December 12, 2019)
6. Audit of the Department of Innovation and Technology's Information Technology Investment Management (published December 19, 2019)

VII. PROJECTS IN PROGRESS

The following 13 projects are underway as of December 20, 2019.

A. CITY DEVELOPMENT AND REGULATORY

1. DEPARTMENT OF PLANNING AND DEVELOPMENT NEGOTIATED SALES PROGRAM NOTIFICATION (#19-0630)

This notification identifies aspects of DPD administration of the Negotiated Sale program that could be strengthened. The notification and response will be summarized in the OIG Fourth Quarter 2019 Quarterly Report.

2. AUDIT OF COMPLIANCE WITH THE TAX INCREMENT FINANCING (TIF) SUNSHINE ORDINANCE AND THE TIF SURPLUS EXECUTIVE ORDER (#19-1047)

This audit evaluates DPD's compliance with the TIF Sunshine Ordinance (MCC § 2-45-155) and Executive Order 2013-3 (Declaration of TIF surplus funds in TIF eligible areas).

B. COMMUNITY SERVICES

None

C. FINANCE AND ADMINISTRATION

1. DEVELOPMENT OF THE CITY CAPITAL IMPROVEMENT PROGRAM AUDIT (#19-0681)

This audit evaluates whether the development of the City's Capital Improvement Program aligns with best practices.

2. CHICAGO BOARD OF ELECTION COMMISSIONERS OPERATIONS AUDIT FOLLOW-UP INQUIRY (#19-0899)

This inquiry follows up on corrective actions taken in response to OIG's 2019 audit of CBOEC operations.

3. DEPARTMENT OF HUMAN RESOURCES EMPLOYEE PERFORMANCE EVALUATION AUDIT (#19-0929)

This audit evaluates whether City departments comply with the personnel rule requiring periodic performance evaluations of all City employees.

4. AUDIT OF THE CITY'S PROCESS FOR EVALUATING AND SETTING USER FEES FOLLOW-UP INQUIRY (#19-1246)

This inquiry follows up on corrective actions taken in response to OIG's 2018 audit of the City's process for evaluating and setting user fees.

D. INFRASTRUCTURE

1. DEPARTMENT OF WATER MANAGEMENT OVERTIME AUDIT (#17-0664)

This audit evaluates DWM's overtime policies and procedures, including the management and distribution of overtime.

2. DEPARTMENT OF STREETS AND SANITATION WEED CUTTING AUDIT (#19-0525)

This audit evaluates DSS's management of weed cutting throughout the city, including vendor oversight and timeliness.

3. CHICAGO DEPARTMENT OF TRANSPORTATION TRAFFIC SIGNAL MANAGEMENT AUDIT (#19-0766)

This audit evaluates CDOT's management, planning, and maintenance of traffic signals.

4. DEPARTMENT OF STREETS AND SANITATION HIGH-DENSITY RESIDENTIAL AND COMMERCIAL BUILDING RECYCLING ENFORCEMENT AUDIT (#19-0942)

This audit evaluates whether DSS is enforcing the municipal code provisions requiring high-density residential and commercial buildings to procure recycling services.

E. PUBLIC SAFETY

1. JUVENILE INTERVENTION SUPPORT CENTER (JISC) AUDIT (#18-0087)

This audit evaluates whether the JISC, a collaborative effort of CPD and DFSS, achieves its program goals and adheres to best practices for law enforcement-based youth diversion programming.

2. CFD DISCRIMINATION AND HARASSMENT AUDIT (#19-0547)

This audit evaluates CFD's efforts to prevent and address harassment and discrimination in CFD.

3. CPD OVERTIME AUDIT FOLLOW-UP INQUIRY (#19-0590)

This inquiry follows up on corrective actions taken in response to OIG's 2017 audit of CPD's controls related to regular-duty overtime.

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 by its Investigations Section;
- performance audits of City programs and operations by its Audit and Program Review Section;
- inspections, evaluations and reviews of City police and police accountability programs, operations, and policies by its Public Safety Section; and
- compliance audit and monitoring of City hiring and employment activities by its Hiring Oversight Unit.

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 violations of laws and policies;
- to improve the efficiency and cost-effectiveness government operations; and
- to prevent, detect, identify, expose, and eliminate waste, inefficiency, misconduct, fraud, corruption, and abuse of public authority and resources.

AUTHORITY

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and 240.

PUBLIC INQUIRIES:

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