



**Association of Inspectors General
524 West 59th Street, 3532N
New York, New York 10018**

June 6, 2022

Deborah Witzburg
Inspector General
Office of Inspector General, City of Chicago
740 N. Sedgwick Street, Suite 200
Chicago, Illinois 60654

Dear Inspector General Witzburg:

On behalf of the Association of Inspectors General (AIG) Peer Review Team (PRT), I am writing to share with you some observations we made when we were at your office from May 16, 2022, through May 19, 2022. The PRT was invited to conduct a Peer Review of your organization's Audit and Program Review (APR), Investigations, and Public Safety Sections from November 1, 2017, through October 31, 2020. The PRT unanimously concluded that the APR, Investigations, and Public Safety Sections complied with the standards set by the Generally Accepted Government Accountability Standards (GAGAS – Yellow Book) issued by the U. S. Government Account Ability Office (GAO) and the Investigations and Public Safety Sections for compliance with the AIG Principles and Standards for Offices of Inspector General (Green Book). An earlier opinion letter dated May 19, 2022, provided this unqualified opinion. The purpose of the present letter is to provide the comments shared with you and your executive staff during the exit conference that took place on May 19, 2022.

On May 19, 2022, the PRT met with you and your executive leadership team. We provided you with our general conclusion regarding compliance and noted several areas of distinction and consideration regarding the Sections. We also meet separately with your Deputy Inspectors General for APR, Investigations, Public Safety Sections, and Technology Operations Sections. In general, the same comments were shared in those meetings, although more operational detail and operating considerations may have been provided to assist your executive team with their functional responsibilities.

The remainder of this letter will address specific areas of distinction and consideration. These comments are based on the direct observations of the PRT members assigned to review each section; interviews with external stakeholders; interviews and Section staff, including interviews with the Associate General Counsel, Assistant Inspector Generals, DIGs, and Chiefs; case file reviews; review of Sectional administrative and operating materials; and the professional judgement and experience of the PRT members. Once

again, nothing in this management letter diminishes the unanimous conclusion of the PRT members that the reviewed areas of the City of Chicago Office of Inspector General (COIG) met all relevant GAGAS and AIG standards for the period under review.

Overall Comments – Areas of Distinction

- **Appointment of a New Inspector General:** The recent appointment of Deborah Witzburg as the new Inspector General for the COIG presents itself as an excellent opportunity for her to imprint her stamp on the office. With her prior experience as an Assistant State Attorney with the Cook County State’s Attorney’s Office and her prior time in various positions and responsibilities within the COIG, she is uniquely qualified to take this office to the next level to fulfill its full potential as an independent, nonpartisan oversight agency for the City of Chicago.
- **Staff:** The PRT found the staff at all levels of the organization to be highly educated, highly motivated, professionals who appear to genuinely enjoy what they do. Their training and prior work experience contributes greatly to the office. Morale appears to be high, and it seems that staff sincerely enjoy working together. There is respect amongst the staff both within and between the different sections. If there are any considerations to be made regarding the staff, it is that they are looking for more empowerment. Allow supervisors and staff to make decisions. They crave more involvement and there is no better way to develop your staff and create future leaders than to have them involved in appropriate decision-making matters.
- **Stakeholders:** The PRT met with several stakeholders, entities that interact with the COIG on a regular basis. The stakeholders included representatives from different City of Chicago Departments and various entities external to the City. The PRT found that the COIG has fostered positive relationships with these entities and is very well respected by them. It should be noted that positive comments were received by all sections of the COIG, APR, Investigations, and Public Safety.

Overall Comments – Areas of Consideration

- **Training Management:** During the prior peer review, it was recommended that there be a central point of coordination to ensure all staff complete requirements associated with their respective certifications. This has not yet been implemented due to staffing changes; however, this continues to remain a recommendation by the PRT. It should be noted that the COIG is in the process of creating a central point of coordination system.
- **Policy Distribution:** When new employees are hired by the COIG they are given a two-week period to review all policies. Their completion of this task is officially

tracked electronically within the office's internal policy distribution system. In contrast, when current employees are notified of a new or revised policies via an office-wide email, there is no official tracking method to ensure staff have reviewed the policies. Currently this information can be manually extracted from the system, but from what we were shown, it is a laborious process and does not produce a report that shows who did or did not review the new or revised policy. A discussion with the DIG for the Technology and Operations section confirmed that this request can be implemented and would be a useful tool.

APR Section – Areas of Distinction

- **Training:** The PRT reviewed the APR members training files and found the APR staff not only met but often exceeded the annual CPE required by the AIG. In addition, the PRT noted that the APR staff commented that APR's supervisory team encourages and keeps the team informed of CPE opportunities.
- **Audit Based Software:** The PRT noted that, as was recommended in the 2019 Management Letter, the APR is in the process of executing a Request for Proposal process to obtain an audit-based system for the APR section. An audit-based case management system will provide a more efficient process for workpaper documentation and cross referencing, workpaper ownership and documentation of management reviews and documented management guidance.
- **Audit Planning Survey:** The PRT noted the APR's effort to include City of Chicago departments, alderman, and citizens in the planning process related to audits by disseminating a survey through their Twitter, Facebook, and other electronic media accounts. It is recommended that APR values the external input into the APR process.
- **Leadership:** The PRT noted the OIG promoted the Deputy Inspector General and Chief Performance Analyst from within the APR. This practice affords the APR institutional knowledge. It also affords the APR administrative staff an undeniable advantage to understanding the needs and challenges of the APR staff members at each level.

APR Section – Areas of Consideration

- **Prior Consideration – Documentation:** The PRT members reviewed the 2019 AIG Peer Review Management letter which suggested the COIG should document the consideration of potential fraud risk indicators in the project planning phase of the audit. Although the APR planning process includes "Project-Based Risk Assessment" workpaper, the PRT noted an absence of this standard workpaper in

the sample of electronic workpaper files for reports published during the review period.

The 2019 Management Letter also recommended the APR document the results of any previous audits that are directly related to the potential audit objectives. The PRT noted that copies of related audits were included in electronic workpaper files. However, the PRT noted an absence of clear documentation of the source, purpose and conclusion(s) related to the audit reports and their relevance to the subject matter of the audit being planned. This type of documentation allows APR staff who are reviewing electronic workpapers to understand the relevance of the audits without having to read the complete document.

Lastly, the 2019 Management letter suggested the APR document the identity of people, resources and/or data systems from which the material was acquired. The PRT noted that electronic workpaper files included several PDF documents for which this information was not documented. The inclusion of this information will provide guidance to APR staff that need to obtain similar information in the future.

- **Preliminary External Survey:** The PRT noted earlier that the APR created and disseminated a survey to departments, alderman, and citizens to obtain their feedback on the 2022 Audit Plan. APR may be able to additionally benefit from using this survey to developing the audit plan. By distributing a broader survey to departments, alderman and the public to identify their areas of concern the APR can obtain even more public buy-in for their efforts to accomplish the OIG's mission.
- **Timely Reporting Process:** The PRT reviewed the APR reporting process and noted consistent tracking of the milestones for each project. However, the PRT noted the sample of reports we reviewed from were issued from 177 to 359 days after the close of fieldwork. The reporting and review process in place undoubtedly contributes to the accuracy and quality of the APR reports. However, setting specific timelines for each step in the review process can improve upon the timeliness of the APR reports while maintaining their accuracy and quality.

Investigations Section – Areas of Distinction

- **Complaint Intake / Complaint Review:** In the prior peer review, the PRT made recommendations regarding logging all complaints, even when the matter is not related to the City of Chicago. The COIG has since updated its complaint intake function and all complaints, regardless of jurisdiction, are logged. This will assist the COIG in various areas, to include intelligence collection.

- **Stakeholder Relationships:** The PRT met with representatives from the City of Chicago General Counsel's Office and Cook County State's Attorney who provided positive feedback regarding their interaction with investigative staff, describing them as "collegial and professional." Stakeholders look forward to continuing their relationship with the new administration.

Investigations Section – Areas of Consideration

- **Centralized Complaint Intake:** The COIG Complaint Intake function is currently housed within the Investigations Division. In Calendar Year 2021, Complaint Intake logged 3,024 complaints. When fully staffed¹, the COIG Complaint Intake Specialist is responsible for logging all complaints in their electronic database. This is then coordinated with the assigned Chief Investigator, reviewed, and potentially assigned to an Investigator for any necessary follow-up (i.e., interviews, record reviews, etc.). The Complaint Intake Specialist, Chief Investigator, and Investigator all make a recommendation for disposition of the complaint. However, it is ultimately reviewed by the DIG for Investigations, and depending on the complaint, it is also reviewed by an Attorney(s), Senior Staff (of other Divisions), and the IG for a final decision. While the sheer volume of complaints received by the COIG is comparable for an agency of this size, the current review and assignment process is somewhat duplicative and burdensome.

The COIG would greatly benefit from having a centralized complaint intake section. The COIG should consider in its development of this section the following:

- Inclusion of sufficient staff solely responsible for receiving, reviewing, gathering additional information, etc. prior to assignment for investigation.
 - Eliminating the multi-level decision making process for all complaints.
 - Creating a documented triage approach which identifies singular points of responsibility for making final disposition decisions. For instance, the authority to open/close all complaints involving residency allegations can be made by the DIG; however, any complaints involving high profile cases must be staffed with a designated AIG Attorney for final disposition.
 - Similar complaint intake models, when used in agencies of this size, have helped to streamline the entire process and direct responsibilities appropriately.
- **Documentation:** The COIG currently uses an electronic database for case management purposes. While files contained all necessary elements, two items for consideration were reviewed:

¹ It is noted that the COIG Complaint Intake function is currently handled by one staff member, with Investigative staff providing backup assistance.

- **Uniform Filing and Naming Conventions:** File storage and naming conventions were not always consistent amongst staff. The COIG should consider creating uniform standards for maintaining documents in its network drive and electronic database. This should also include uniform naming conventions.
- **Journal Entries:** While the use of journal entries in the electronic database was created to document case events, it is not always used consistently amongst staff. The COIG should use its electronic database to its full potential and consider the required use of journal entries (case statuses) to track ongoing case milestones such as subpoenas being issued, document requests being made, attempts to locate, etc. Not only will this assist in case progression, but it will also keep necessary information readily available in situations such as case transfers, case reviews, law enforcement coordination, etc.
- **Timeliness:** The COIG has established timelines for ongoing meetings to review case statuses; however, it currently has no established timelines for completion of assigned investigations. While it is acknowledged that investigative cases cover a variety of disciplines and can range from simple to complex, the COIG should consider implementing timelines during the assignment phase for completion of an investigation. This should also include the ability to extend those timelines with justification and approval from management. Having established timelines will assist with case progression.

Public Safety Section – Areas of Distinction

Public Safety: During the last review in 2019, the Public Safety section was a newly formed entity, and an informal assessment was performed concerning their policies and procedures. There were no areas of consideration noted.

- **Teamwork/Collaboration:** Employees within the Public Safety division are inspired and ready to do their job to ensure that their oversight mission is performed as intended. The section primarily performs oversight of the Chicago Police Department and to comply with the requirements of the Consent Decree. The oversight of the Consent Decree is a court-approved settlement that requires the Chicago Police Department (CPD) and the City of Chicago (the City) to reform training, policies, and practices in a number of important areas, such as use of force, community policing, impartial policing, training, accountability, officer wellness, data and information systems, and more. The Public Safety section work together, not only within their section, but with other COIG personnel in the audit and investigation divisions to ensure actions are thorough and complete. They also work with other entities within the city government using their professionalism to obtain the desired information for their actions.

- **Published Reports:** The PRT reviewed 6 published actions/reports during the review period which were clear and concise, and continued to bring great recognition to the COIG. In reviewing the reports and associated documents, it was evident the section was new and as the more recent reports were published, they were more thorough and had better details and organization. External interviews by the PRT further substantiated the reports issued are well researched and findings are justified. The section now utilizes the CCM case management system for planning actions, documenting activity, and disposition, which is augmented by storing data in a secure COIG share drive. Information was well-organized in digital files and allowed for tracking activity.

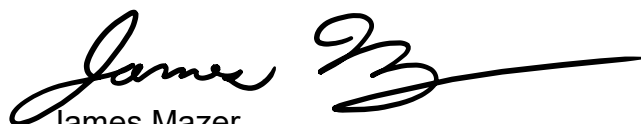
Public Safety Section – Areas of Consideration

- The only area which may be improved would be the tracking of training, which has been discussed earlier in this report.

In conclusion, on behalf of the AIG, the PRT would like to commend you on leading an exemplary organization. The environment that the COIG operates in is both challenging and rewarding. The COIG is a large office with unique jurisdiction and responsibility unlike other local government inspector general offices. In addition to the normal challenges facing an office of inspector general, like the internal and external stakeholders, the local elected officials, and the numerous City of Chicago Departments, the COIG is tasked with overseeing a citywide Consent Decree. A task, which from the feedback received during the Peer Review, you do admirably. The PRT is grateful for the insightful learning experience. We hope that you find our comments helpful and we look forward to continuing to support your organization's needs in the future.

Please feel free to contact me or any member of the Peer Review Team if you have any questions.

Yours truly,



James Mazer,
PRT Leader, AIG Peer Review for City of Chicago Office of Inspector General, May 2022
Peer Review Committee, Association of Inspectors General

cc:

Flora Miller, Team Member, AIG Peer Review for City of Chicago Office of Inspector General, May 2022

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