AUDIT AND PROGRAM REVIEW SECTION 2022 ANNUAL PLAN

APPROVED BY THE INSPECTOR GENERAL DECEMBER 10, 2021



WILLIAM MARBACK
INTERIM INSPECTOR GENERAL FOR THE CITY OF CHICAGO

DARWYN JONES
DEPUTY INSPECTOR GENERAL FOR AUDIT & PROGRAM REVIEW

TABLE OF CONTENTS

I.	N	MISSION	5
II.	F	PURPOSE OF THE ANNUAL PLAN	6
	A.	SUBJECT TO CHANGE	6
	В.	DEPARTMENTAL ACTION	6
	C.	PROCESS	6
III.	S	ELECTION OF TOPICS FOR INCLUSION IN THE ANNUAL PLAN	7
	A.	TOPIC SOURCES	7
	В.	PRIORITIZATION CRITERIA	7
	1	. Risk Assessment	7
	2	. OIG Role and Value Added	8
	3	. Follow-Up on Past APR Reports	8
	4	. Available Staff Resources	9
I۷.	2	022 NEW PROJECTS	10
	A.	CITY DEVELOPMENT AND REGULATORY	10
	1	. Department of Business Affairs and Consumer Protection (BACP) Labor Rights	
		Enforcement	10
	2	. Department of Cultural Affairs and Special Events (DCASE) Chicago Film Office	11
	3	. Department of Housing (DOH) Troubled Buildings (TBI) Initiative	11
	4	. Department of Planning and Development (DPD) Jobs Covenants	12
	5	. DPD Large Lots Program	12
	6	. Zoning Board of Appeals (ZBA) Decisions	12
	В.	COMMUNITY SERVICES	13
	1	. Enforcement of Prohibition on Illegal Dumping	13
	C.	FINANCE AND ADMINISTRATION	13
	1	. Complaint-Driven Service Provision Advisory	13
	2	. Administrative Fines for Vehicle Stickers Inquiry	13
	3	. Prompt Payment	14
	4	. Workers' Compensation Program	14
	5	. Contract Monitoring and Closeout Procedures	14
	6	. Capital Project Implementation	14
	7	. City Council Office of Financial Analysis (COFA) Compliance with Municipal Code	
		Reporting Requirements	15
	D.	INFRASTRUCTURE	15
	1	. Information Security Office (ISO) Information Technology (IT) Project Review	15
	2	. Enforcement of Vehicle Idling Limits	15
	3	. Chicago Department of Transportation (CDOT) Street Resurfacing and Maintenance	16
	4	. DSS Tree Trimming, Planting, and Removal	16
	5	. Cleaning of and Service Provided to Encampments of People Experiencing	
		Homelessness	16
	6	. DSS Street Sweeping Efficiency	17
	7	. Department of Water Management (DWM) Sewer Cave-In Repair Time	17
	8	. Bike Lane Maintenance and Enforcement Advisory	17
	9	. Water Billing Accuracy	17
	E.	PUBLIC SAFETY	18

	1.		
		Civilianization	
	2.	!	
	3.	9	
	4.	6 / 6	
٧.	R	EPORTS PUBLISHED IN 2021	
	Α.	CITY DEVELOPMENT AND REGULATORY	20
	1.		
		(#21-0444)	
	В.	COMMUNITY SERVICES	21
	1.		21
	2	1167)	21
	2.		22
	2	Privacy and Cybersecurity (#20-1263)	22
	3.		22
	C	and Cybersecurity Audit Follow-Up (#21-1199)	
	C.	FINANCE AND ADMINISTRATION	24
	1.	Department of Human Resources Employee Performance Evaluation Audit Follow-Up (#21-0724)	2/
	2.		24
	۷.	0229)	25
	3.	,	
	3. 4.		
	т. D.	INFRASTRUCTURE	
	1.		
	2.		20
		0446)	29
	3.	·	25
	٥.	Follow-Up (#21-0399)	30
	4.		
		(#20-0830)	31
	E.	PUBLIC SAFETY	
	1.	Audit of Policies and Practices Related to Discrimination and Sexual Harassment Within	
		the Chicago Fire Department (#19-0547)	31
	2.		
		Times (#20-0567)	32
	3.	Chicago Police Department and Department of Family and Support Services'	
		Administration of the Juvenile Intervention and Support Center Audit Follow-Up	
		(#21-0580)	33
VI.	. F0	OLLOW-UP REPORTS TO CONDUCT IN 2022	35
VI	l. Pi	ROJECTS IN PROGRESS	36
	Α.	CITY DEVELOPMENT AND REGULATORY	36
	1.	Audit of the City's Compliance with the Tax Increment Financing (TIF) Sunshine	
		Ordinance and Surplus Executive Order (#19-1047)	36
	2.	Audit of the Department of Buildings (DOB) Permit Issuance and Inspections (#20-	
		0831)	36
	3.	Audit of DOB and Department of Law's Prosecution and Resolution of Off-Premise Sign	
		Permit Violations (#20-1285)	36

4.	Audit of the Department of Planning and Development's (DPD) Neighborhood	
	Opportunity Fund Administration (#21-0395)	36
В.	COMMUNITY SERVICES	36
1.	Audit of the Chicago Department of Public Health (CDPH) Construction and Demolition	
	Debris Recycling (#20-1562)	36
2.	Audit of the Department of Family and Support Services' (DFSS) Strategic Contracting	
	(#20-1629)	36
C.	FINANCE AND ADMINISTRATION	37
1.	City Data Quality Advisory (#21-1035)	37
D.	INFRASTRUCTURE	37
E.	PUBLIC SAFETY	37

ACRONYMS

APR Audit and Program Review Section

BACP Department of Business Affairs and Consumer Protection CARES COVID-19 Assessment and Response Electronic System

CDOT Chicago Department of Transportation
CDPH Chicago Department of Public Health

CFD Chicago Fire Department

COFA City Council Office of Financial Analysis

CPD Chicago Police Department

DCASE Department of Cultural Affairs and Special Events

DFSS Department of Family and Support Services

DHR Department of Human Resources

DOB Department of Buildings
DOF Department of Finance
DOH Department of Housing
DOL Department of Law

DPD Department of Planning and Development DPS Department of Procurement Services

DSS Department of Streets and Sanitation
DWM Department of Water Management
GAS Government Auditing Standards

ISO Information Security Office
IT Information Technology

JISC Juvenile Intervention and Support Center

MCC Municipal Code of Chicago
OIG Office of Inspector General
PBC Public Building Commission
TBI Troubled Buildings Initiative
TIF Tax Increment Financing
ZBA Zoning Board of Appeals

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 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.

APR's role is separate from, but complements, the work performed by the OIG Investigations and Public Safety sections. Investigations primarily examines allegations of individual misconduct or wrongdoing, and Public Safety focuses on the Chicago Police Department, Civilian Office of Police Accountability, 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 Compliance section, which performs legally mandated reviews of the City's hiring and employment practices to ensure compliance with the City's various hiring Plans.

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, senior OIG staff, and APR 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 hotline; 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.

We released an online survey to accompany a draft version of this plan and solicited feedback to inform this final version. We encourage the public to submit suggestions anytime through the OIG website.

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
 - o Size (in dollars budgeted) of department/program
 - Number of staff working in department/program
- Public interest/impact
 - o Critical to City's mission or core service provision
 - o Affects public health or safety
 - Affects vulnerable populations
 - o Affects equitable provision and distribution of City services and support
- 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,

- o Existence of robust operational policies and procedures
- o 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.

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. 2022 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 27 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. We do not rank the topics. The numbers below are provided solely for ease of identification. We solicited public comment on these topics and used that feedback to determine which topics to include on this final 2022 Plan. Each topic listed includes,

POTENTIAL Potential questions the project will seek to answer. APR refines the objectives

OBJECTIVES: after obtaining more information about the topic from the department.

RATIONALE: Relevance of and background on the topic.

There are five projects on the 2021 Plan that have not been launched and will not be carried over to the 2022 Plan for the following reasons:

- COVID-19 Emergency Assistance Funds, because it was considered lower priority than other projects.
- Department of Family and Support Services Meals on Wheels Program Administration, because it was considered lower priority than other projects.
- Fee and Fine Write Downs and Unenforced Municipal Code Penalties, because a related audit is in progress. We will revisit this topic in 2023.
- Cloud Computing Tax Enforcement, because it was considered lower priority than other projects.
- Department of Assets, Information and Services' Maintenance of Energy-Saving Systems in City Buildings, because it was considered lower priority than other projects.
- Chicago Fire Department Albrecht Decree Compliance, because OIG has a related project underway.

A. CITY DEVELOPMENT AND REGULATORY

Department of Business Affairs and Consumer Protection (BACP)
 Labor Rights Enforcement

POTENTIAL OBJECTIVES:

- Does BACP's Office of Labor Standards ensure employer compliance with the City's labor rights ordinances by appropriately enforcing their provisions?
- Do BACP's rules related to these ordinances align with best practices?

RATIONALE:

The City has approved several ordinances expanding labor rights with enforcement through a new BACP Office of Labor Standards. These include minimum wage, sick leave, fair workweek, COVID leave and vaccine antiretaliation, wage theft, and domestic worker rights ordinances. This audit will determine whether BACP has been effective in enforcing these ordinances.

Department of Cultural Affairs and Special Events (DCASE) Chicago Film Office

POTENTIAL OBJECTIVES:

- Does DCASE ensure that production companies pay fees due to participating City agencies (Police, Fire and Streets and Sanitation), and do those fees recoup the full cost of City services?
- Does the Film Office coordinate with City departments to respond to public complaints about film productions?
- How does the Film Office hold productions accountable for complaints and any associated code violations?
- Does the Film Office assess the impacts of film production on communities in which they occur?

RATIONALE:

The Chicago Film Office serves as a liaison between other City departments and film productions taking place within Chicago. This audit will determine whether DCASE is ensuring that film productions reimburse the City appropriately for services, how the City responds to resident complaints about film productions, and whether the City assesses community impacts in neighborhoods where film production takes place.

3. Department of Housing (DOH) Troubled Buildings (TBI) Initiative

POTENTIAL OBJECTIVES:

- Does DOH ensure that TBI vendors and grant recipients meet contractual requirements?
- Does TBI provide targeted enforcement in low- and moderate-income areas to complement strategic efforts to preserve the stock of affordable housing?

RATIONALE:

TBI aims to preserve affordable housing by acquiring and improving vacant and abandoned structures. TBI works through the court system with private receivers, community groups, and several City departments to return buildings to productive use. This audit will determine whether TBI grant recipients and vendors comply with program requirements, and whether DOH uses TBI in a strategic manner to coordinate with other City efforts to preserve affordable housing.

4. Department of Planning and Development (DPD) Jobs Covenants

POTENTIAL OBJECTIVES:

- Does DPD include public benefit covenants in Tax Increment Financing redevelopment agreements with private entities?
- Does DPD enforce its public benefit covenants with private entities?

RATIONALE:

When DPD uses City resources for economic development investments, it signs a Redevelopment Agreement (RDA) with the developer. These RDAs often include covenants requiring the developer to provide certain public benefits, such as a minimum number of jobs created. This audit will determine how often DPD includes such covenants in RDAs and whether it enforces these covenants.

5. DPD Large Lots Program

POTENTIAL OBJECTIVES:

- Does DPD ensure program applicants provide all necessary information, and that property buyers meet the requirements set forth by the City in order to be eligible for property purchase?
- Does DPD monitor compliance of lot owners to ensure the program is achieving its goals?

RATIONALE:

The Large Lots Program makes certain vacant, City-owned lots available for purchase by residents who own property in the same neighborhood. This audit will determine whether the City ensures that buyers meet program requirements and whether they comply with program requirements after purchase.

6. Zoning Board of Appeals (ZBA) Decisions

POTENTIAL
OBJECTIVES:

- Does ZBA make decisions only within its authority?
- Does ZBA make decisions consistent with approval criteria, evidence, hardships, and/or other review factors?

RATIONALE:

ZBA reviews requests for variances from the Zoning Ordinance, special use permits, and appeals of decisions by the zoning administrator. This audit will determine whether ZBA's variance decisions are within limits allowed by the Zoning Ordinance and whether these decisions are allowable under one of the acceptable reasons specified in the Zoning Ordinance.

B. COMMUNITY SERVICES

1. Enforcement of Prohibition on Illegal Dumping

POTENTIAL
OBJECTIVES:

- Do the Chicago Department of Public Health (CDPH) and the Department of Streets and Sanitation (DSS) respond to illegal ("fly") dumping complaints in an equitable and effective manner?
- Does the Department of Law ensure that illegal dumping cases are prosecuted in accordance with the Municipal Code of Chicago (MCC)?

RATIONALE:

Illegal dumping creates physical and environmental hazards in the neighborhoods where it occurs. CDPH and DSS rely on complaints to identify cases of illegal dumping and provide a cash incentive to residents whose complaint is found to be valid. This audit will determine if the City responds effectively and equitably to complaints, and prosecutes illegal dumping cases under the MCC.

C. FINANCE AND ADMINISTRATION

Complaint-Driven Service Provision Advisory

POTENTIAL OBJECTIVE:

• How can the City effectively balance complaint-driven service provision with proactive service provision?

RATIONALE:

Multiple OIG audits have uncovered City services that are driven primarily or entirely by 311 service requests. While 311 is an important source of information, exclusive reliance on complaints to drive service provision is neither efficient nor equitable. This advisory will suggest ways to design proactive programs to complement complaint-based service.

2. Administrative Fines for Vehicle Stickers Inquiry

POTENTIAL
OBJECTIVES:

• Has the City implemented all recommendations made by the Chicago Fines, Fees, and Access Collaborative?

RATIONALE:

In 2019, the Chicago Fines, Fees, and Access Collaborative, led by the Clerk's Office, released a set of recommendations related to fine and fee structures, payment plans, penalties, and debt collection. This inquiry will determine whether the City has implemented all recommendations to achieve equitable practices and compliance.

3. Prompt Payment

POTENTIAL OBJECTIVE:

• Does the City pay invoices in a timely manner?

RATIONALE:

The City is generally required by contract to pay an invoice within 60 days of receiving it. This audit will determine whether the City pays invoices within that timeframe.

4. Workers' Compensation Program

POTENTIAL OBJECTIVES:

• Has the City implemented recommendations made by Grant Thornton LLP 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 ensure the program's legal compliance, prevent fraud, and improve efficiency. This report will determine whether the City has implemented the recommendations.

Contract Monitoring and Closeout Procedures

POTENTIAL OBJECTIVE:

- Are the Department of Procurement Services' (DPS) contract compliance monitoring and closeout procedures aligned with best practices?
- Do City departments effectively and consistently use contract compliance monitoring and closeout procedures to assess vendor performance?

RATIONALE:

In 2015, the Procurement Reform Task Force identified a lack of compliance monitoring and robust closeout processes as serious risks for the City and its sister agencies. This audit will determine whether DPS' contract compliance and closeout procedures are aligned with best practices, and whether DPS ensures these procedures are implemented consistently across departments so that contractors are held accountable for meeting contract terms.

6. Capital Project Implementation

POTENTIAL OBJECTIVE:

- Does the capital project implementation process address identified capital needs?
- Is the City implementing capital projects according to best practices?

RATIONALE:

The City makes capital investments to improve or expand services, or to improve the internal functioning of the City itself. This audit will use a case study to determine whether a City department was able to meet its capital needs through the City's capital project implementation process, and to determine whether this process aligns with best practices.

7. City Council Office of Financial Analysis (COFA) Compliance with Municipal Code Reporting Requirements

POTENTIAL OBJECTIVE:

 Does COFA provide all MCC-required reporting, including fiscal impact statements, budget options reports, and a review of annual budget forecasts?

RATIONALE:

As of September 7, 2021, the latest fiscal impact statement provided on COFA's website was dated July 2019, suggesting that COFA has either not conducted financial analysis since that time or has not provided the reports as required.

D. INFRASTRUCTURE

Information Security Office (ISO) Information Technology (IT) Project Review

POTENTIAL OBJECTIVES:

- Does ISO conduct readiness assessments on IT projects to ensure that the projects conform with the City's Information Security and Technology policies?
- Does ISO conduct periodic compliance assessments on active IT projects?

RATIONALE:

The City's Information Security and Technology Policies require ISO to review all IT projects to ensure that they meet minimum security controls before moving into production. ISO is also responsible for periodically reviewing active information systems to ensure that they remain in compliance with the policies. This audit will determine whether ISO is reviewing projects and ensuring compliance as required.

2. Enforcement of Vehicle Idling Limits

POTENTIAL OBJECTIVES:

- Does the City of Chicago enforce idling limits on private vehicles?
- Does the City of Chicago enforce idling restrictions on City-owned vehicles?

RATIONALE:

The MCC prohibits idling any vehicle with a diesel engine for more than three minutes at a time, and internal City polices prohibit idling in any City-owned vehicle. This audit will determine whether the City enforces this portion of the MCC on privately-owned vehicles, and whether the City enforces its policies on users of City-owned vehicles.

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 instead on constituent complaints and visual inspections. The audit also found that the City could save \$4.6 million annually by reallocating money from resurfacing to preventive maintenance. Poor street conditions continue to concern roadway users. This audit will re-examine the City's pavement management program.

4. DSS Tree Trimming, Planting, and Removal

POTENTIAL OBJECTIVES:

- Does the DSS Bureau of Forestry achieve its goal of responding to tree trimming requests within 45 days?
- Do the City's urban forest management practices meet best practices?
- Is tree removal and replacement conducted equitably across the City?

RATIONALE:

OIG has received complaints about the length of time it takes the City to respond to tree-trimming requests, and a 2019 OIG advisory noted that the City's reliance on requests alone, rather than grid-based scheduled trimming, is neither equitable not efficient. This audit will evaluate DSS' urban forestry practices against best practices.

5. Cleaning of and Service Provided to Encampments of People Experiencing Homelessness

POTENTIAL OBJECTIVES:

- Does the City provide adequate notice of encampment cleanings and evictions to people experiencing homelessness?
- Does the City protect the personal property of people experiencing homelessness during encampment cleanings and evictions?
- Does the City's provision of services to homeless encampments meet best practices?

RATIONALE:

The City periodically performs cleanings, temporary evictions, and service outreach to encampments (or "tent cities") where people experiencing homelessness live. This audit will evaluate whether the City provides adequate notice to encampment residents, protects their personal property, and follows best practices for such cleanings.

6. DSS Street Sweeping Efficiency

POTENTIAL OBJECTIVES:

• Do DSS' street sweeping routes maximize the equity, effectiveness, and efficiency of street sweeping citywide?

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. This audit will evaluate DSS' performance of this function.

7. Department of Water Management (DWM) Sewer Cave-In Repair Time

POTENTIAL OBJECTIVES:

 Does DWM conduct sewer cave-in inspections and repairs in a timely manner?

RATIONALE:

OIG has received complaints about the amount of time it takes DWM to repair sewer cave-ins (holes in pavement caused by collapsed underground sewer infrastructure). This audit will evaluate the Department's sewer-cave in repair time.

8. Bike Lane Maintenance and Enforcement Advisory

POTENTIAL OBJECTIVES:

- Does CDOT's bike lane infrastructure align with best practices, specifically regarding the prohibition of vehicles stopping or standing in bicycle lanes?
- Do CDOT's policies regarding the clearing and maintenance of bike lanes align with best practices?

RATIONALE:

OIG has received complaints about the number of vehicles that block bicycle lanes, including City vehicles, endangering cyclists. This advisory will evaluate CDOT's policies and procedures as they relate to best practices.

9. Water Billing Accuracy

POTENTIAL OBJECTIVES:

- Does the City credit or refund metered accounts the correct amount following an overcharge?
- Does the City effectively manage disconnecting water service for vacant properties?

RATIONALE:

Several news stories have identified instances of overbilling for water and City residents having difficulty getting these issues resolved. This audit will determine whether the City responds appropriately to overbilling cases, as well as examine the City's management of water service disconnection for vacant properties.

E. PUBLIC SAFETY

Note: OIG's Public Safety section conducts inspections, evaluations, and reviews of City police and police accountability programs, operations, and policies. See the Public Safety Section's annual plan on OIG's website.

1. Chicago Police Department (CPD) and Chicago Fire Department (CFD) Position Civilianization

POTENTIAL
OBJECTIVES:

Have CPD and CFD maximized opportunities for civilianizing positions?

RATIONALE:

Past OIG reports identified positions in the police and fire departments that were filled by sworn or uniformed members but could be performed by civilians. This advisory will determine what progress each department has made and what barriers to civilianization may still exist.

2. CFD Fire Prevention Inspections

POTENTIAL OBJECTIVES:

- Does CFD's Fire Prevention Bureau conduct the annual inspections required by the MCC?
- Does CFD notify noncompliant building owners and conduct timely followup 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. This audit will evaluate the Department's performance of this role.

3. CFD Overtime Management

POTENTIAL OBJECTIVES:

- Does CFD allocate staff in a manner that minimizes overtime?
- Does CFD maintain and enforce policies that ensure appropriate and equitable assignment of overtime to staff?

RATIONALE:

In recent years, spending on CFD overtime has increased significantly. While some use of overtime is expected, excessive or inequitably distributed overtime may indicate suboptimal personnel management. This audit will evaluate CFD's overtime practices.

4. Office of Emergency Management and Communications 311 Call Center Effectiveness

POTENTIAL OBJECTIVES:

- Does 311 meet best practices for call center performance?
- Does 311 ensure that City departments get an appropriate amount of information to carry out service requests?

RATIONALE:

The City uses 311 as a primary point of contact for many service requests. This audit will determine if 311 is an effective means of collecting these requests and if it provides enough information to other City departments to allow them to respond to the requests they receive.

V. REPORTS PUBLISHED IN 2021

APR published the following 9 reports in 2021 (as of December 10, 2021). All are available at <u>igchicago.org</u>.

A. CITY DEVELOPMENT AND REGULATORY

1. Chicago Low-Income Housing Trust Fund Housing Quality Inspections Audit Follow-Up (#21-0444)

PUBLICATION

DATE:

July 7, 2021

SUMMARY:

OIG followed up on its December 2019 Chicago Low-Income Housing Trust Fund Housing Quality Inspections Audit. Based on the Trust Fund's responses, OIG concluded that the Trust Fund fully implemented 3 of 14 corrective actions related to the audit findings, substantially implemented 2, partially implemented 7, and had not implemented 2.

The purpose of the 2019 audit was to determine if the Trust Fund met its mission of providing "secure, safe, and sound" housing by ensuring that RSP properties,

- received their required annual Housing Quality Standards (HQS) inspections;
- had evidence of a lead safe housing certificate in their contracts;
- came into compliance after the discovery of housing deficiencies, including serious health and safety risks; and
- addressed unresolved Chicago Building Code violations.

Our audit found that in 2017, the Trust Fund did not ensure all properties met housing quality standards. The Trust Fund subsidized properties with Chicago Building Code violations and other serious housing quality deficiencies, had a payment system that inadequately protected against potential fraud and errors, paid properties with incomplete contract documentation, and published inaccurate and incomplete quarterly reports from 2014 through 2018.

Our follow-up found that the Trust Fund has partially implemented corrective actions related to inspection compliance tracking, payments, and record-keeping. The Trust Fund hired a new vendor to conduct housing inspections, and another to design an electronic portal that integrates its contract management and subsidy request systems. The Trust Fund has not completed the transition away from a manually updated spreadsheet, but expected to after it fully implemented new software in the third quarter of 2021. The Trust

Fund cancelled 2020 HQS inspections due to the COVID-19 pandemic; it resumed in-person inspections in April 2021.

We urge the Trust Fund to fully implement an electronic system that allows it to actively monitor inspection and contract compliance, write instructions for how to identify building code violations, transition away from its manually updated spreadsheet, and implement controls to ensure accurate payments.

B. COMMUNITY SERVICES

1. Chicago Department of Public Health Air Pollution Enforcement Audit Follow-Up (#20-1167)

PUBLICATION

DATE:

January 7, 2021

SUMMARY:

OIG completed a follow-up to its September 2019 audit of the Chicago Department of Public Health's (CDPH) Air Pollution Enforcement. Based on the Department's responses, OIG concluded that CDPH fully implemented 10 out of 14 corrective actions, substantially implemented 2, and partially implemented 2.

The purpose of the 2019 audit was to determine if CDPH met its air quality inspection frequency goals, ensured that applicable facilities maintained a valid Certificate of Operations (COO), responded to air-quality complaints within 24 hours, and maintained complete and accurate records on the City's Data Portal. Our audit found that the Department was not meeting its internal goals for air-quality inspection frequency, was not consistently categorizing facilities based on their potential to emit pollution, and was not ensuring that facilities annually renew their required COO. We also determined that the Department did not ensure that violations identified by inspectors were resolved.

Our follow-up found that CDPH conducted a comprehensive review of its permit data and removed inactive records. The Department also developed an inspection priority index and dashboard to track progress towards these priorities. The priority index is based on factors such as a facility's history of COO compliance, emission level potential, and the pollution burden of the nearby community. CDPH also changed the date of COO renewal for all facilities to January 1, developed a dashboard that tracks the COO status of permitted facilities, and sends monthly notices to facilities whose renewals are overdue.

We urge CDPH to continue working towards developing inspection frequency goals for all permitted facilities based on the inspection priorities it has

developed, issuing refunds to permit holders who overpaid for their annual COO, and updating its Inspection Manual to reflect the many policy changes the Department has made.

2. Audit of the Department of Public Health COVID-19 Contact Tracing Program: Data Privacy and Cybersecurity (#20-1263)

Publication Date:

April 29, 2021

SUMMARY:

OIG evaluated CDPH's COVID-19 contact tracing program to determine if the Chicago Department of Public Health (CDPH) mitigated privacy and security risks associated with the collection, storage, and transmittal of COVID-19 contact tracing data in accordance with the City's Information Security and Technology Policies (ISTP) and the Centers for Disease Control and Prevention guidance.

OIG found that CDPH's COVID-19 contact tracing program mitigates data privacy and cybersecurity risks. CDPH's case management tool, the COVID-19 Assessment and Response Electronic System (CARES), met the security requirements of the City's ISTP. Training for contact tracers aligns with the City's ISTP, and CDPH maintains a record of all contact tracers' completion of training. The case management tool's access controls met the security requirements of the ISTP, but CDPH did not promptly remove access for all terminated users. The case management tool prompts contact tracers to inform individuals that all information will be confidential and secure, and requires individuals' consent to be recorded, but does not prompt notification of how long the City will store the information. CDPH has policies to mitigate risks when exchanging confidential information through electronic communications. CDPH also has policies that designate persons responsible for reviewing data requests but does not provide explicit criteria for determining whether to release data.

The Department agreed with OIG's recommendations to adjust its process for promptly removing access to CARES for terminated users, update the call script to inform patients and contacts how long the City will retain their data, and update their data release policy to include explicit criteria for staff to reference to when determining whether to grant data requests.

3. Chicago Department of Public Health COVID-19 Contact Tracing Program: Data Privacy and Cybersecurity Audit Follow-Up (#21-1199)

Publication Date:

December 2, 2021

SUMMARY:

OIG completed a follow-up to its April 2021 audit of CDPH's COVID-19 contact tracing program's data privacy and cybersecurity. Based on CDPH's responses, OIG concluded that the Department fully implemented two of the three corrective actions and substantially implemented one.

The purpose of the 2021 audit was to determine if CDPH managed privacy and cybersecurity risks associated with the collection, storage, and transmittal of COVID-19 contact tracing data in accordance with the City of Chicago's Information Security and Technology Policies and the United States Centers for Disease Control and Prevention guidance.

Our audit found that the Department's COVID-19 contact tracing program mitigated data privacy and cybersecurity risks. Although improvements to policies and procedures could have encouraged consistent and timely application of the security measures, CDPH's efforts to safeguard data suggested that personal information was nevertheless protected. In its response to the audit, CDPH stated that it would incorporate employment status reviews into its weekly check-ins with CBOs that employ contact tracing staff, allowing the Department to promptly remove access for terminated employees. The Department also stated that it would create a data retention policy and criteria for the review of data requests.

Our follow-up concluded CDPH fully implemented two of the three recommended corrective actions and substantially implemented the third. Specifically, CDPH implemented a process to receive weekly termination lists from CBOs that employ contact tracing staff, thus allowing CDPH to remove 92.1% of terminated employees' access to CARES within 7 days of their terminations. The Department also created an internal data retention policy and updated its CARES call script to inform contacts that their data will be retained for five years. Finally, CDPH updated its internal data release policy to include detailed guidance regarding which staff are responsible for handling external data requests, as well as explicit criteria and procedures for reviewing those requests.

Once fully implemented, OIG believes the corrective actions may reasonably be expected to resolve the core findings noted in the audit. CDPH should continue to improve the process for removing CARES access for terminated employees and ensure that access is removed within seven days for 100% of terminated employees.

C. FINANCE AND ADMINISTRATION

1. Department of Human Resources Employee Performance Evaluation Audit Follow-Up (#21-0724)

Publication Date:

July 13, 2021

SUMMARY:

OIG followed up on its October 2020 audit of the Department of Human Resources' (DHR) management of the City's employee performance evaluation process. Based on the Department's responses, OIG concluded that the Department partially implemented two corrective actions and did not implement four of the six corrective actions related to the audit findings.

The purpose of the 2020 audit was to determine whether DHR ensured that City departments evaluated their employees as required by its Personnel Rules, and, if so, whether the evaluation process aligned with national best practices. Our audit found that DHR did not ensure that departments evaluated all employees or clearly define evaluation roles and responsibilities. As a result, 13 departments—comprising more than 6,000 City employees—reported they did not conduct annual performance evaluations of all of their employees, and another 7 City departments—comprising more than 10,000 employees—reported they did not conduct any performance evaluations whatsoever.

Based on the results of the audit, OIG recommended that DHR develop a Citywide performance evaluation system with standardized procedures, conduct a staffing assessment to determine the number of staff needed to administer this system, consider implementing an automated evaluation process, revise Personnel Rule XIV to clearly define performance evaluation expectations and responsibilities, and report on departmental compliance to the Mayor's Office.

Our follow-up found that the Department has identified ways to use existing City data systems to monitor departments' completion of annual evaluations, but has not yet created or implemented a Citywide evaluation policy. The Department attributed this to technical issues and operational changes in response to COVID-19, and stated it intends to issue a policy by the end of 2021. We urge the Department to fully implement the audit's recommendations.

2. Follow-Up on Audit of Delays in Providing Notice of Sanitation Code Violations (#21-0229)

PUBLICATION

July 29, 2021

SUMMARY:

DATE:

OIG completed a follow-up to its 2019 audit of the Department of Law's (DOL) delay in providing sanitation violation notifications. In the 2019 audit, OIG found that DOL notified property owners an average of 289 days—more than 9 months—after the alleged violation.

Based on the results of the audit, OIG recommended that DOL work with the Department of Streets and Sanitation to set a target for the maximum number of days from violation to notification and implement performance monitoring. OIG further recommended ways for DOL to address its backlog of violations, including hiring temporary staff or forgiving older violations. In its response to the audit, DOL stated that OIG's recommendations were "unfeasible" and did not commit to implementing any of them.

In February 2021, OIG inquired about corrective actions taken by DOL in response to the audit. Based on the Department's follow-up response, OIG concluded that DOL has not implemented any corrective actions. Specifically, DOL has not developed a target or goal for the time to notification and has not implemented performance monitoring. Similar to its response to the audit, DOL again stated that OIG's recommendations are not feasible.

3. Audit of the Municipal Depository Designation Process (#20-1024)

Publication Date:

August 31, 2021

SUMMARY:

OIG conducted an audit of the Department of Finance's (DOF) administration of the process for designating municipal depositories. Banks designated as depositories hold and pay interest on funds deposited by the City and the Chicago Board of Education, essentially serving as the City's checking accounts. The objectives of the audit were to determine if DOF ensured that banks applying for designation submit the required information, and whether the designation process serves the City's goal of partnering with institutions that not only have the capacity to fulfill its banking needs, but also provide financial services to Chicago communities in an inclusive and equitable manner.

OIG concluded that, although DOF ensured that banks submitted all documentation required by the RFP, it did not evaluate whether the banks provided inclusive and equitable financial services throughout Chicago.

Without undertaking a substantive evaluation of each bank seeking designation, DOF could not identify demographic disparities in banking activity. Banks may then continue to lend inequitably across Chicago while the City continues to partner with them.

OIG also found that DOF, City Council, and the Treasurer's Office have not coordinated their efforts in the municipal depository designation process to achieve the City's objective of encouraging equitable banking practices. The three entities largely acted in isolation, and Council designated depositories infrequently. This lack of coordination hindered meaningful discussion of alternative banking options that may better align with the City's equitable banking goals.

OIG recommended that DOF, in collaboration with City Council's Committee on Finance, develop and implement a process to evaluate banks' lending and deposit records for equitable financial services provision. This process should include provisions related to sharing evaluation results with Council and applicant banks. We also recommended that DOF collaborate with Council and the Treasurer's Office to develop a coordinated municipal depository designation process that aligns with the City's equitable banking goals and allows the City to deposit public funds with banks that share and live up to those goals.

In response to our audit findings and recommendations, DOF stated that it is working with the Treasurer's Office and City Council committees to determine the information it will request and review from banks in the future. DOF also stated that, along with the Treasurer's Office, it is updating the 2022 RFP process—in a manner compliant with applicable law—and has committed to forming an evaluation committee to ensure banks have met the requirements. Finally, DOF stated its commitment to promoting equitable lending opportunities across Chicago communities and expressed its perspective that municipal depositories may not be the best vehicle for achieving equitable lending goals. It has formed a task force along with the Treasurer's Office, State Treasurer, and banking institutions to explore alternative solutions.

4. Audit of City Council Committee Spending and Employee Administration (#20-0285)

Publication Date:

October 13, 2021

SUMMARY:

OIG evaluated City Council Committees' spending and employee administration practices to determine if City Council committees complied with the provisions in the City's annual appropriations ordinance for

committee expenditures and use of committee staff, and with municipal code requirements for employee recordkeeping.

OIG requested 16 months of employee records, randomly selected from June 2015 through March 2020, from five committees. Four of the five committees were unable to provide all requested records. In addition, from the total of 13 committees reviewed, seven committee chairs directed or allowed committee employees to work on non-committee matters, which constituted noncompliance with the state and municipal requirements that governmental entities expend appropriated funds only for their designated purposes. It also may have created inequalities between wards by effectively giving some aldermen disproportionally more resources for their non-committee work. Lastly, OIG identified 29 non-personnel committee expenditures totaling \$35,895 made for non-committee purposes. However, by July 2019 Council and the Department of Finance had improved their processes to effectively mitigate the risk of such impermissible payments.

OIG recommended that City Council require all committees to use an electronic timekeeping system, as well as develop a transition process for committee chairs that assures that all employee attendance records are fully accounted for and transferred to a central record repository or to the chair's successors. OIG also recommended that Council develop standardized policies and procedures to ensure compliance with all record retention requirements and notify the Local Records Commission of its past failure to retain employee attendance documentation. OIG recommended that Council ensure that those committee chairs directing or allowing staff to work on non-committee business develop and implement a strategy to transition away from the practice. Furthermore, we recommended that City Council analyze the personnel needs of each committee, write job descriptions with minimum requirements and expectations for all positions, and allocate resources accordingly. OIG also suggested that Council consider undertaking an analysis to determine the personnel needs for ward offices. Finally, OIG suggested that Council might fulfill these recommendations by retaining a dedicated administrative officer both to standardize administrative and personnel practices, and the meet Council's operational needs through coordination with the relevant City departments.

In response to our audit findings and recommendations, City Council representatives stated that City Council would not implement an electronic timekeeping system but will develop a uniform system of paper recordkeeping. Council representatives declined to comment on the missing records of prior chairs, but stated that committee chairmen will seek assistance to comply with the Local Records Act from the President Pro Tempore. Council representatives declined to conduct a staffing analysis or to

ensure the duties of committee staff are limited to committee work.
Representatives stated, however, that the chair of the Committee on
Committees would review existing protocols for transitions between chairs to
determine if any revisions are needed.

D. INFRASTRUCTURE

1. Department of Water Management Overtime Monitoring Audit Follow-Up (#20-1268)

Publication Date:

February 25, 2021

SUMMARY:

In October 2020, OIG inquired about the status of corrective actions taken by the Department of Water Management (DWM) in response to its March 2020 audit of overtime monitoring, and followed up again as the Department took further corrective action in December 2020 and January 2021. OIG concluded that DWM had made progress on the audit's recommendations, fully implementing 7 of 13 corrective actions, substantially implementing 3, and partially implementing 3.

The purpose of the 2020 audit was to determine if DWM effectively monitored overtime to prevent waste and abuse. Our audit found that DWM had policies and tools to manage overtime but did not use the resources consistently. Also, DWM management could not ensure overtime was offered in accordance with collective bargaining agreements and established practices because it was unaware of the full range of overtime processes in use across the Department, did not provide robust oversight, and did not consistently retain overtime records. Our follow-up found that DWM had updated and begun distributing its overtime policy; begun operationalizing a new overtime reporting tool; standardized some overtime call-out processes; and made improvements to its transfer request form design, processing, and retention.

We urge the Department to distribute its revised overtime policy to all employees; fully catalog its various overtime call-out processes from beginning to end, in order to streamline or consolidate such processes; complete its update of document retention policies; and provide additional guidance to employees on the transfer request process as needed.

Department of Streets and Sanitation Weed-Cutting Program Audit Follow-Up (#21-0446)

Publication Date:

July 29, 2021

SUMMARY:

In March 2021, OIG inquired about the status of corrective actions taken in response to its July 2020 Audit of the Department of Streets and Sanitation's (DSS) weed-cutting program. Based on the Department's responses, OIG concluded that DSS has fully implemented one corrective action, partially implemented one and has not implemented five.

The purpose of the July 2020 audit was to determine whether DSS met its goals of mowing all City-owned vacant land at least 4 times during the growing season and addressed all overgrown weed complaints within 42 days. Our audit found that DSS did not have a complete or accurate list of City-owned vacant lots, therefore the Department could not ensure that City-owned vacant lots were cut at least four times per year. Ward superintendents often entered citations into the Mobile Electronic Ticketing System (METS) for City-owned properties, leaving it up to DOL to review and reject these erroneous charges. In addition, DSS staff resolved complaints in a variety of ways, but the flaws in the Department's data system made it difficult to determine the specifics of any particular closed-out complaint work order. Therefore, the Department could not determine if it addressed weed complaints in a timely manner.

Based on the results of the audit, OIG recommended that DSS work with the Department of Planning and Development (DPD) and DOL to compile an accurate list of City-owned vacant lots, adjust ward superintendents responsibilities to be responsible only for identifying sanitation nuisances and responding to complaints, develop and communicate performance-based weed cutting goals, and improve data entry practices to capture the information necessary to assess its weed-cutting performance. In its response, DSS described corrective actions it would take.

Based on the Department's follow-up response, OIG concluded that DSS has made some progress on the audit's recommendations. Specifically, DSS has,

- developed and communicated performance-based goals for the weedcutting process, complaint response, and management of City-owned land;
- begun to actively work with DPD to compile a more accurate inventory of City-owned property.

To fully satisfy the audit's recommendations, DSS should implement changes for ward superintendents' responsibilities, begin using a route planning tool to optimize routes, address data quality issues in Salesforce, and better link data between the different systems utilized to track weed-cutting.

3. Chicago Department of Transportation Commercial Driveway Billing Audit Second Follow-Up (#21-0399)

Publication Date:

August 5, 2021

SUMMARY:

OIG completed a second follow-up to its July 2019 audit of the Chicago Department of Transportation's (CDOT) billing process for commercial driveway permit annual fees. The purpose of the 2019 audit was to determine whether CDOT accurately and completely billed commercial property owners for driveways that use the public way. Our audit found that the Department either did not bill, or inaccurately billed, an estimated 6,713 permitholders, had no confidence that all relevant driveways were recorded in its driveway permit system, and did not actively pursue payment for driveway permit fees that were past due.

OIG recommended several steps that CDOT should take to correct data problems hampering its billing operations and to prevent such problems in the future. Furthermore, we recommended that CDOT collaborate with other departments to include driveway permit fees in the City's standardized debt collection process.

In February 2020, OIG inquired about the status of corrective actions taken by CDOT to correct data problems and collect debt. Based on CDOT's follow-up response, OIG concluded that CDOT had partially implemented corrective actions. In March 2021, OIG again inquired about the status of corrective actions again. Based on CDOT's second follow-up response, OIG concluded that CDOT still has only partially implemented corrective actions. While the department has migrated data to the new Infor Public Sector system and created internal controls to prevent future inaccuracies and monitor at-risk permits, CDOT still has not corrected all inaccurate permit records, identified undocumented driveways, credited and reimbursed overbilled accounts, nor pursued driveway debt. Many of the remaining corrective actions are contingent on the correction of inaccurate permit records. Until then, the City will continue to experience revenue loss.

4. Audit of the Public Building Commission's Administration of Building Commissioning (#20-0830)

Publication Date:

September 23, 2021

Summary:

OIG conducted an audit of the Public Building Commission of Chicago's (PBC) administration of building commissioning required by the Chicago Energy Conservation Code. Building commissioning is the process of documenting and verifying how buildings' mechanical systems are designed, installed, and tested to meet their owners' specific needs. The objective of the audit was to determine whether PBC ensured that all required building commissioning documentation was developed and provided to its clients.

OIG found that commissioning teams created reasonably complete documentation for four of the five projects we reviewed. However, this commissioning documentation was not always accessible to building maintenance staff. Staff from all five projects stated they were still waiting to receive complete commissioning documents but believed the trainings they attended were adequate to operate and maintain their buildings' systems.

OIG recommended that PBC define, document, and implement a process for ensuring that all projects subject to the Chicago Energy Conservation Code are fully commissioned, collecting all required commissioning documentation, and providing each document to the client agency within its specified time frame. We also recommended PBC follow up with building maintenance staff at recently commissioned projects and ensure they can access the commissioning documentation they need. PBC agreed with our recommendations and said it would advise its clients of commissioning requirements, ensure commissioning documents are provided on time and that staff have access to them, and work to resolve building issues that maintenance staff have identified.

E. PUBLIC SAFETY

1. Audit of Policies and Practices Related to Discrimination and Sexual Harassment Within the Chicago Fire Department (#19-0547)

PUBLICATION

DATE:

April 14, 2021

SUMMARY:

OIG evaluated the Chicago Fire Department's (CFD) practices related to discrimination and sexual harassment. The Department—which is 90% male and 66% White— has been a defendant in multiple discrimination and sexual harassment lawsuits.

OIG found that while CFD's policies comply with federal, state, and local laws, the policies themselves, as well as the complaint process and training used to enforce and promote them, are insufficient to meet the environmental challenges posed by a command and control emergency service operation like CFD. OIG also learned that CFD's process for scheduling interviews for members who made formal complaints about discrimination or harassment placed them at risk of retaliation and potentially discouraged them from reporting misconduct. We notified the Department about the potential flaws in its complaint interviewing process before the release of the audit and suggested revising its approach. In response, CFD implemented changes to its complaint and investigation policy.

OIG recommended that CFD implement supplementary training for its staff that is specific to the fire service and that is provided by trainers with fire service experience. We also recommended that CFD appoint a diversity, equity, and inclusion officer to consult on issues of diversity, discrimination, and sexual harassment, and that CFD develop a strategy to include more safeguards to protect reporting members and victims from potential retaliation.

The Department agreed to implement OIG's recommendations, but stated it would not commit to a strategy to do so until a new commissioner was appointed.

2. Second Audit of the Chicago Fire Department's Fire and Emergency Medical Response Times (#20-0567)

Publication Date:

October 12, 2021

SUMMARY:

OIG conducted a second audit of CFD's fire and emergency medical services (EMS) response times. The first audit was published in 2013.

We concluded that CFD has not implemented performance management strategies that would allow it to evaluate its response times in alignment with best practices, which OIG first recommended in 2013. CFD did not measure turnout and travel as separate components of response time, use industry-standard percentile measures, or publish performance reports. CFD has not documented fire or EMS response time performance goals outside of its state-required EMS plan. We also found CFD's data is not adequate to reliably measure response time. From January 2018 to November 2020, only 75.2% of CFD's records had the necessary data to calculate turnout and travel times for the first arriving vehicle.

OIG recommended that CFD management acknowledge the importance of department-wide quantitative performance measures and begin public annual reporting on its response time performance. In addition, CFD should document and publish turnout, travel, and total response times for both fire and EMS at the 90th percentile. CFD should identify, monitor, and remedy the cause of gaps in its data, and consider hiring additional staff for this purpose. CFD should also ensure that any external partners conduct a full assessment of its data completeness and reliability.

CFD acknowledged the importance of department-wide quantitative performance measures and agreed with the audit findings, stating that it would implement OIG's recommendations. Specifically, CFD stated that it would analyze its data to identify "causative factors and or trends," "perform a complete and reliable measure of response time by each component piece and in total," and determine a reasonable percentile goal "as the completeness of data elements improves." CFD agreed to work with other City departments to improve and monitor data quality and hire additional data analytics staff.

3. Chicago Police Department and Department of Family and Support Services' Administration of the Juvenile Intervention and Support Center Audit Follow-Up (#21-0580)

PUBLICATION DATE:

November 18, 2021

SUMMARY:

In April 2021, OIG inquired about the status of corrective actions taken in response to its February 2020 audit of CPD and the Department of Family and Support Services' (DFSS) administration of the Juvenile Intervention and Support Center (JISC). Based on the Departments' responses, OIG concluded that CPD and DFSS fully implemented 12 of the 24 corrective actions related to the audit findings, substantially implemented 3, partially implemented 6, and not implemented 3.

The purpose of the 2020 audit was to determine if JISC was designed according to best practices for law enforcement-based youth diversion and whether its administration of diversion programming was consistent with its goals, such as reducing youth recidivism. We found that poor record-keeping and lack of collaboration prevented the City from determining whether JISC reduced recidivism, and that components of the program risked retraumatizing youth or increasing the likelihood of reoffending. CPD and DFSS agreed with recommendations to improve record-keeping and collaboration, create accountability mechanisms for JISC's case management contractor, establish external partnerships, and align JISC's design with best practices.

Our follow-up found that the City has,

- formed an advisory council to monitor the JISC program and reforms;
- defined goals, protocols, roles, and responsibilities for the program and each partner;
- contracted a new case management agency as well as an independent research team to analyze outcomes;
- made aesthetic improvements to the JISC facility;
- trained officers on youth development and trauma; and
- implemented new procedures to retain screening and case management records.

The departments have not begun,

- utilizing a validated risk screening tool;
- recording when youth are handcuffed to stationary objects;
- allowing officers to bid for JISC positions based on skill rather than seniority; or
- ensuring that supervisors review diversion decisions in real time.

The departments stated the City planned to replace JISC with a new diversion model in 2022, therefore they would not enact some of the recommended corrective actions. However, the departments stated the City's new diversion model would incorporate these recommendations.

VI. FOLLOW-UP REPORTS TO CONDUCT IN 2022

The following published reports will be evaluated for follow-up in 2022. APR first considers a report for follow-up six months after publication. Follow-up may be postponed until 12 or more months after 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. Department of Streets and Sanitation Commercial and High-Density Residential Recycling Enforcement Audit (published December 2, 2020)
- 2. Audit of the City's Capital Improvement Program Development and Evaluation (published December 22, 2020)
- 3. Audit of Policies and Practices Related to Discrimination and Sexual Harassment Within the Chicago Fire Department (published April 14, 2021)
- 4. Chicago Department of Transportation Traffic Signal Planning Audit (published June 17, 2021)
- 5. Department of Human Resources Employee Performance Evaluation Audit Second Follow-Up (published July 13, 2021)
- 6. Audit of the Municipal Depository Designation Process (published August 31, 2021)
- 7. Audit of the Public Building Commission's Administration of Building Commissioning (published September 23, 2021)
- 8. Second OIG Audit of the Chicago Fire Department's Fire and Emergency Medical Response Times (published October 12, 2021)
- 9. Audit of City Council Committee and Employee Administration (published October 13, 2021)
- 10. Audit of the City's Compliance with the Tax Increment Financing Sunshine Ordinance and Surplus Executive Order (publication date pending)

VII. PROJECTS IN PROGRESS

The following seven projects are underway as of December 10, 2021.

A. CITY DEVELOPMENT AND REGULATORY

1. Audit of the City's Compliance with the Tax Increment Financing (TIF) Sunshine Ordinance and Surplus Executive Order (#19-1047)

This audit evaluates the Department of Planning and Development'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).

2. Audit of the Department of Buildings (DOB) Permit Issuance and Inspections (#20-0831)

This audit evaluates whether DOB performs the required permit-related building inspections, included those necessary for Certificates of Occupancy.

 Audit of DOB and Department of Law's Prosecution and Resolution of Off-Premise Sign Permit Violations (#20-1285)

This audit evaluates the departments' efforts to remediate off-premise sign permit violations by imposing penalties, ensuring valid permits are obtained, or removing unpermitted off-premise signs.

4. Audit of the Department of Planning and Development's (DPD) Neighborhood Opportunity Fund Administration (#21-0395)

This audit evaluates DPD's administration of the Neighborhood Opportunity Fund to ensure consistent application of program rules, outcome monitoring, and performance measurement.

B. COMMUNITY SERVICES

1. Audit of the Chicago Department of Public Health (CDPH) Construction and Demolition Debris Recycling (#20-1562)

This audit evaluates CDPH's enforcement of the ordinances requiring contractors to recycle certain amounts of debris from demolition and construction projects.

2. Audit of the Department of Family and Support Services' (DFSS) Strategic Contracting (#20-1629)

This audit evaluates whether DFSS' implementation of its strategic contracting processes for selecting delegate agencies meet the requirements of the Commitment to Outcomes.

C. FINANCE AND ADMINISTRATION

1. City Data Quality Advisory (#21-1035)

This advisory compiles examples of incomplete, inaccurate, or otherwise unusable data in City files and databases and suggests ways the Mayor's Office may drive better data quality.

D. INFRASTRUCTURE

None

E. PUBLIC SAFETY

None

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 human resources activities by its Compliance Section.

From these activities, OIG issues reports of findings and disciplinary or 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 of government operations; and to prevent, identify, and eliminate waste, misconduct, fraud, corruption, and abuse of public authority and resources.

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

Communications: (773) 478-8417 | communications@igchicago.org

TO SUGGEST WAYS TO IMPROVE CITY GOVERNMENT

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

TO REPORT FRAUD, WASTE, AND ABUSE IN CITY PROGRAMS

Call OIG's toll-free hotline: (866) 448-4754 / TTY: (773) 478-2066 Or visit: igchicago.org/contact-us/report-fraud-waste-abuse/

Alternate formats available upon request.





