CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

2023

AUDIT AND PROGRAM REVIEW SECTION ANNUAL PLAN

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Acronyms

APR   OIG Audit and Program Review Section
ARO   Affordability Requirements Ordinance
BACP   Department of Business Affairs and Consumer Protection
BORC   Department of Streets and Sanitation's Bureau of Rodent Control
CDO   Chief Data Officer
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
CPL   Chicago Public Library
DCASE   Department of Cultural Affairs and Special Events
DEI   Diversity, Equity, and Inclusion
DFSS   Department of Family and Support Services
DHR   Department of Human Resources
DOB   Department of Buildings
DOH   Department of Housing
DPD   Department of Planning and Development
DPS   Department of Procurement Services
DSS   Department of Streets and Sanitation
EAP   Employee Assistance Program
EEO   Equal Employment Opportunity
FHWA   Federal Highway Administration
GAS   Government Auditing Standards
GBV   Gender-based violence
IAD   Chicago Fire Department's Internal Affairs Division
ISO   Information Security Office
IT   Information Technology
ISTP   Information Security and Technology Policies
LSE   Life Safety Evaluation
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
RDA   Redevelopment Agreement
SLA   Service Level Agreement
SRO   Single Room Occupancy
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 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.

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 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 year, and reviews, updates, and later publishes the final Plan.

III | Selection of Topics for Inclusion in the Annual Plan

A | Topic Source

OIG gathers potential audit topics from a variety of sources, including: intakes received from the public; suggestions from City officials, employees, and stakeholders; 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 solicit feedback and to inform this final version. We encourage the public to submit suggestions anytime through the OIG website: igchicago.org/talk2ig.

B | Prioritization Criteria

OIG considers several 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.

C | 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
    - 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,
    - 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.

D | 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.

E | 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.

F | 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 | 2023 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 25 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 2023 Plan. Each topic listed includes,

Background and Rationale:	Background on and relevance of the topic.
Potential Objectives:	Potential questions the project will seek to answer. APR refines the objectives after obtaining more information about the topic from the department.

There are seven projects on the 2022 Plan that have not been launched and will not be carried over to the 2023 Plan because they were considered lower priority than other projects. There projects are:

- Department of Housing Troubled Buildings Initiative
- Department of Planning and Development Large Lots Program
- Administrative Fines for Vehicle Stickers Inquiry
- Enforcement of Truck Idling Limits
- Capital Project Implementation
- DSS Tree Trimming, Planting, and Removal
- DSS Street Sweeping Efficiency

A| City Development and Regulatory

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

Background and Rationale:	The City of Chicago has several laws in place to protect workers, including ordinances defining local minimum wage, domestic worker rights, paid sick leave, wage theft, and COVID-19 vaccine and anti-retaliation protections. In 2019 City Council created BACP's Office of Labor Standards (OLS) to enforce these protections for all Chicago workers. OLS is responsible for conducting outreach to local employers, processing and investigating complaints, mediating disputes, directing settlement proceedings, and issuing violations. This audit will determine whether BACP has been effective in enforcing these ordinances.

Potential
Objectives:
- Does BACP's Office of Labor Standards enforce provisions of the City's labor rights ordinances to ensure employer compliance? Such ordinances address wage theft, domestic worker rights, paid sick leave, and anti-retaliation related to COVID-19 and vaccines.
- Do BACP's rules related to these ordinances meet best practices?

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

Background
and
Rationale:

Film production is a major Chicago industry. The city ranks in the top six nationally for overall film production and the film industry has contributed an estimated $2 billion in local revenue since 1980. Film productions directly impact Chicago residents by generating permit revenue and employment opportunities but may also create potential interruptions in the form of street closures, noise, pollution, and use of City infrastructure and resources. City Council members and local advocates have voiced concern about inequitable distribution of these impacts, particularly in South and West neighborhoods which are home to major film studios and popular filming sites.

The Chicago Film Office serves as a liaison between City departments and film productions for permits, logistical support, and other city services. This audit would determine how the Film Office responds to resident complaints, whether the City meets its community benefit commitments to neighborhoods where film production takes place, and whether it ensures that productions reimburse the City appropriately for services.

Potential
Objectives:
- Does DCASE ensure that production companies pay fees due to participating City agencies (CPD, CFD, and DSS), 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 meet its community benefit commitments for neighborhoods impacted by filming?

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

Background
and
Rationale:

When it uses City resources for economic development investments such as Tax Increment Financing (TIF), DPD signs a Redevelopment Agreement (RDA) with the developer. These RDAs often include covenants requiring the developer to provide quantifiable and measurable public benefits in exchange for their taxpayer-funded support, such as a minimum number of jobs created. A 2012 Illinois Public Interest Research Group report on job creation through TIF projects found that some agreements contained scarcely enforceable standards for public benefits, while others reported job creation and retention numbers that were not substantiated. This audit will determine whether DPD includes such covenants in all RDAs and whether it enforces these covenants.

Potential Objectives:	• Does DPD include public benefit covenants in all Tax Increment Financing (TIF) redevelopment agreements with private entities? • Does DPD enforce its public benefit covenants with private entities?

4. Zoning Board of Appeals (ZBA) Decisions

Background and Rationale:	Property owners must receive approval from the ZBA to develop a property in a way that does not comply with the Chicago Zoning Ordinance. The Ordinance limits such variations to situations in which strict compliance would create specific difficulties or hardships. Through an initial review of meeting minutes, it appears the ZBA approves most variation requests. However, publicly-available documentation does not appear to demonstrate the specific hardships defined by the ordinance. Furthermore, the variation application process is legally complex and requires numerous fees, creating the risk that it will be restricted to those with the resources to navigate the process. This audit will determine whether ZBA's variance decision process adheres to the limits allowed by the Zoning Ordinance and the acceptable reasons specified in the MCC.
Potential Objectives:	• Does ZBA make decisions regarding ordinance variations only within its authority? • Does ZBA make variation decisions consistent with approval criteria, evidence, hardships, and/or other review factors?

5. Inclusionary Housing Task Force Report Implementation

Background and Rationale:	In September 2020, the Department of Housing (DOH) published the Inclusionary Housing Task Force Staff Report to inform updates of the City's primary inclusionary housing tool, the Affordable Requirement Ordinance (ARO). The ARO requires new and rehabbed residential developments to include a percentage of affordable units, aiming to ensure that "private development creates affordable housing in communities where the market and public policy have failed to do so." The report included nine recommendations to strengthen inclusionary housing policies in Chicago. To provide transparency to the residents of Chicago, this audit will assess what changes DOH has made to inclusionary housing policies to address the Report's recommendations.
Potential Objective:	• Has DOH implemented corrective actions to address the recommendations from the Inclusionary Housing Task Force Staff Report?

B| Community Services

1. Chicago Department of Public Health (CDPH) Enforcement of Prohibition on Illegal Dumping

Background and Rationale:	Illegal dumping creates physical and environmental hazards in the neighborhoods where it occurs. CDPH relies on complaints to identify cases of illegal dumping. However, this complaint-driven process might not be effective or equitable since underserved areas may have a greater number of empty lots or abandoned buildings that invite illegal dumping but lack resources to address the issue. CDPH, DSS, CPD, and DOL each have a role in the process of inspecting, cleaning, and prosecuting instances of illegal dumping. In 2019, CBS 2 News reported on dumping that had repeatedly occurred in the same lot for ten years despite persistent complaints to the City. This audit would determine whether CDPH responds effectively and equitably to complaints and coordinates with other City departments to address illegal dumping cases.
Potential Objectives:	• Does CDPH respond to illegal ("fly") dumping complaints in a timely manner? • Is there a disparity in the outcomes of complaint-driven process in different areas of the city? • To what extent do CDPH, DSS, CPD, and DOL work together to address the issue of illegal dumping?

2. Mental Health Equity

Background and Rationale:	The World Health Organization reported a 25% increase in the prevalence of anxiety and depression worldwide, and local media reported an increase in the number of emergency calls related to mental health. The City reports that "40% of Chicagoans feel that mental health is one of the greatest challenges facing Chicago today." The Framework for Mental Health Equity is a broad initiative that seeks to provide residents with comprehensive care and fill gaps in the current mental healthcare system. Specifically, it aims to increase access to mental health services across the City with a focus on communities that experience high levels of poverty and violence. Additionally, the Framework aims to increase violence prevention programming. This audit will assess the extent to which the Framework has succeeded in meeting its goals.
Potential Objectives:	• Has CDPH implemented the goals outlined in Mayor Lightfoot's Framework for Mental Health Equity? • Does CDPH measure the progress of its mental health equity initiatives to inform future goals?

3. Chicago Public Library (CPL) Staff Development Plan

Background and Rationale:	The Chicago Public Library has served the city for nearly 150 years, often as the public's first interaction with City services. In recent years, CPL has seen increases in the community's need for library-based social services, access to CPL's social workers, and digital resources. Additionally, aldermen have asked about the library's response to some of the city's most vulnerable populations, including at-risk children and people experiencing homelessness. As part of its

2020-2024 Strategic Plan, CPL set a number of goals to train staff to meet these expanding needs, with particular focus on accessibility, diversity and inclusion, and trauma-informed collective care. This audit would assess CPL's progress towards achieving these staff development-related goals.

Potential Objective:
- Has CPL implemented the staff development portions of its 2020 strategic plan?

4. Department of **Family & Support Services' (DFSS)** Gender-Based Violence (GBV) and Human Trafficking Reduction

Background and Rationale:
Survivors of GBV and human trafficking can face multiple barriers when interacting with government agencies and seeking services. The Citywide Strategic Plan aims to reduce these barriers and provide trauma-informed services to survivors through a whole of government approach. This audit will determine the extent to which these goals have been achieved and the role that the GBV Inter-agency Working Group played in the process.

Potential Objectives:
- Has DFSS achieved the goals it committed to in the Citywide Strategic Plan to Address Gender-based Violence and Human Trafficking?
- Has the Mayor's Office ensured that the GBV Inter-agency Working Group implemented the Citywide Strategic Plan to Address Gender-based Violence and Human Trafficking?

5. Food Equity Council and Agenda

Background and Rationale:
In recent years, the City has acknowledged the longstanding and growing need to address food insecurity across the city, particularly in historically disenfranchised communities on the South and West sides. In winter 2020, the Mayor's Office, the Greater Chicago Food Depository, and the Departments of Public Health (CDPH) and Family and Support Services (DFSS) collaborated to create the Food Equity Agenda, with the goal to "transform the food system by removing barriers to urban farming, supporting BIPOC food entrepreneurs, and better connecting residents with nutrition programs and healthy, affordable food." According to the City, the agenda is also a "key implementation step" of the mayor's anti-poverty strategy and citywide Healthy Chicago 2025 plan. This audit would determine whether the City achieved the goals of the Food Equity Agenda and related Food Equity Council.

Potential Objectives:
- Has the City achieved the goals it committed to in the Food Equity Agenda?
- Has the Food Equity Council increased transparency, set policy, and published annual reports on their progress?

C| Finance and Administration

1. Prompt Payment

Background and Rationale:
The City is generally required by contract to pay an invoice within 60 days. Preliminary data analysis suggests that some departments may be slow to submit payment approvals to the Department of Finance. The City commissioned

a disparity study for its Minority- and Women-owned Business Enterprise (MBE/WBE) program in construction contracts, which found that slow payment is a particular barrier to these firms' ability to do business with the City. This audit will determine whether the City pays invoices within the required timeframe.

Potential Objective:	• Does the City pay invoices within the contractually required time period?

2. Contract Monitoring and Closeout Procedures

Background and 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. In 2020, DPD created procedures for monitoring and closeout, including a closeout checklist and site visit guidance. However, elected officials continue to raise concerns about timeliness of the closeout process and inconsistency of compliance monitoring among departments. This audit will determine whether the Department of Procurement Services' (DPS) contract compliance and closeout procedures are aligned with best practices and implemented consistently across departments.
Potential Objectives:	• Are DPS' contract compliance monitoring and closeout procedures aligned with best practices? • Do City departments effectively and consistently use the contract compliance monitoring and closeout procedures DPS created?

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

Background and Rationale:	COFA is required by the Municipal Code of Chicago (MCC) to provide City Council with independent annual and quarterly reports, including fiscal impact statements, budget options reports, and reviews of annual budget forecasts, as well as any ad hoc reports requested by aldermen. Recently, there have been complaints regarding the timeliness of the reports and media outlets have reported that sections of COFA documents may have been plagiarized. This audit will seek to determine if COFA fulfills its role by publishing accurate, timely reports to serve City Council.
Potential Objective:	• Does COFA provide all reporting required by the MCC, including fiscal impact statements, budget options reports, and a review of annual budget forecasts?

4. Earmarked Funds

Background and Rationale:	Earmarked funds are monies set aside by City Council for special purposes such as homelessness prevention, the emergency telephone system, and public art. These funds are typically raised through City fees and surcharges, and in many cases, MCC requires them to be kept separately from the City's general expense fund ("the corporate fund").

During the course of a current audit, OIG discovered that an earmarked fund required by MCC does not exist within the City accounting system and that the earmarked money had been deposited into the corporate fund. Although OIG inquired, the Office of Budget and Management (OBM) did not confirm whether the fund had ever existed, raising procedural questions about how earmarked funds are created and whether they are used as intended by City Council. This audit will determine whether earmarked taxpayer dollars are collected and spent as intended.

Potential Objectives:
- What is the process to ensure that special funds required by the MCC are established?
- Have the funds and separate accounts required to exist by the MCC been established and are they actively used?
- What procedures ensure that the creation and use of special funds is transparent to the public?

5. Employee Assistance Program (EAP) Performance

Background and Rationale:
Employee assistance programs are intended to support employees whose job performance is suffering due to issues such as mental health needs, substance abuse, stress, or grief. The City of Chicago's EAP is a free resource for roughly 13,500 non-police and fire employees and their eligible family members that provides confidential assessments, counseling, and referral services. The City's EAP aims to "eliminate costly consequences of personal problems that may affect productivity and efficiency" and provide employees with "the opportunity to lead healthier, happier, and productive lives to the benefit of all." However, the City does not publish metrics on the program's effectiveness and the EAP was staffed by a sole clinician as of September 2022, raising questions about the program's utilization and accessibility. This audit would assess the design, performance, and legal compliance of the program.

Potential Objectives:
- Is the City's EAP designed and managed in alignment with best practices?
- Does the City set goals for and monitor the effectiveness of its EAP?
- Are EAP records kept in compliance with national, state, and local confidentiality laws?

D| Infrastructure

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

Background and Rationale:
The City's Information Security and Technology Policies (ISTP) require the ISO to review all IT projects to ensure that they meet minimum security controls before moving into production. The ISO is also responsible for periodically reviewing active information systems to ensure that they remain in compliance with the policies. Adherence to the ISTP is important to protect the confidentiality, integrity and availability of the City's information technology data and assets. This

audit will determine whether the ISO reviews projects and ensures compliance as required.

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?

2. Chicago Department of Transportation (CDOT) Street Resurfacing and Maintenance

Background and 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 to determine whether improvements have been made to increase the efficiency and effectiveness of the program.

Potential Objective:
- Does CDOT manage streets in a cost-effective way that extends pavement life?

3. Water Billing Accuracy

Background and Rationale:
Several news stories have identified instances of the City overbilling residents for water usage, with some of the errors amounting to tens of thousands of dollars. Residents reported difficulty in getting the issues resolved, often being charged penalties on the disputed amounts. This audit will determine whether the City responds appropriately to overbilling cases and also examine the City's management of water service disconnection for vacant properties.

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?

4. DSS's Administration of Car Impound Lots

Background and Rationale:
The City of Chicago tows and impounds vehicles that have created parking hazards, been abandoned, belong to drivers who owe debt to the City, or that have allegedly been used in a crime. The towing and impound process has been subject to complaints and negative press. Drivers have alleged that the pounds have misplaced cars, and the Department of Finance acknowledged that a WBEZ review found incorrectly calculated fines and fees due to computer and human errors as well as inaccurate inventories. This audit will examine how DSS and its contractor, United Road Towing, manage and administer the car impound lots under their control.

Potential Objectives:	• Does DSS ensure that its impound lots correctly calculate impound, storage, and administrative fees and fines levied on drivers?
	• Does DSS ensure that its impound lots maintain accurate inventories of impounded vehicles?
	• Does DSS ensure that vehicles identified for disposal are eligible and that disposal reports are complete and accurate?
	• Does DSS ensure that the impound and recovery process is clear and navigable to residents?

5. DSS Rat Abatement

Background and Rationale:	Rat infestations are a perennial health and quality-of-life concern in Chicago, which is considered one of America's 'rattiest' cities. OIG has received multiple complaints about the efficiency and effectiveness of the City's rat abatement program. This project would determine whether BORC conducts abatement in a timely, effective, and equitable manner and in accordance with best practices.

Potential Objectives:	• Does DSS' Bureau of Rodent Control (BORC) meet its target rodent complaint response time of five days or fewer?
	• Does BORC deliver complaint-based and preventive abatement services in an effective and equitable manner?
	• Do BORC's complaint-based and preventive activities follow best practices in Integrated Pest Management?

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 at: 2023 Public Safety Draft Outlook for Public Comment.

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

Background and Rationale:	Civilianization is the process where administrative positions held by sworn or uniformed officers are converted into positions that are held by non-sworn or non-uniformed individuals. Civilianization presents opportunities for cost savings and increased operational efficiencies. Past OIG reports identified missed opportunities to civilianize positions in the police and fire departments. This advisory will determine what progress each department has made and what barriers to civilianization may still exist.

Potential Objective:	• Have CPD and CFD maximized opportunities for civilianizing positions?

2. CFD Overtime Management

Background and Rationale:	Despite budgeting $166 million for overtime between 2017 and 2021, CFD spent over $330 million on overtime across those five years. 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.

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?

3. Office of Emergency Management and Communications (OEMC) 311 Call Center Effectiveness

Background and Rationale:	The 311 call center is an essential service for people to report service needs, check the status of previous service requests, obtain information regarding City programs or events, and file non-emergency police reports. In the City service delivery process, the 311 call center plays a key information triage role between residents and the relevant City departments. This audit will determine whether 311 is an effective means of collecting these requests and whether it provides enough information to other City departments to allow them to respond to the requests they receive.

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?

4. Life Safety Ordinance Enforcement

Background and Rationale:	Following several deadly fires, a 2004 ordinance required hundreds of high-rise buildings built before 1975 to retrofit with automatic sprinkler systems *or* pass a Life Safety Evaluation (LSE). LSEs are scored tests conducted by architects or engineers to certify the adequacy of fire safety measures. Due to the expense of sprinkler retrofits, most pre-1975 high-rises opted for LSEs instead. During a current audit, OIG determined that the City does not maintain a required public list of pre-1975 high-rise buildings that have passed LSEs, making it difficult to judge how many have mitigated their fire safety risks. This project will determine whether DOB and CFD maintain a public list of compliant buildings as required by MCC and ensure that covered high-rise buildings fulfill life safety requirements.

Potential Objectives:	• Do the Department of Buildings (DOB) and CFD ensure that relevant high-rise buildings have submitted and passed Life Safety Evaluations, and does DOB maintain a public list of compliant buildings as required by MCC? • Do DOB and CFD ensure that buildings that maintain the features identified in life safety compliance plans after renovations or construction, and do they ensure compliance with life safety data reporting requirements?

5. CFD Equipment Inventory

Background
and
Rationale:

CFD uses specialized firefighting and emergency medical equipment that may require secure custody or be expensive to replace. OIG previously issued a property-control advisory (#19-006) about a large number of CFD badges reported stolen or missing prior to members' retirement, and audits in Sacramento, St. Louis, and Long Beach have found that fire departments did not meet best practices for the use, maintenance, and disposal of inventory. Although CFD General Order 93-006 requires a complete physical inventory of CFD's property every year, the nearly 30-year old Order gives responsibility for the inventory to two separate divisions that now appear to be combined into a liaison position within a different bureau.
This audit will determine whether CFD maintains an accurate count and control of its equipment and other property.

Potential
Objectives:

- Does CFD have controls to ensure that it maintains a consistent and accurate inventory of equipment and property as required by CFD General Order 93-006 and MCC § 2-36-230?

V | Reports Published in 2022

APR published the following nine reports in 2022. All are available at igchicago.org.

A| City Development and Regulatory

1. **Audit of the City's Complia**nce with the TIF Sunshine Ordinance and TIF Surplus Executive Order (#19-1047), published January 27, 2022

2. Audit of the Department of B**uildings' Permit Inspections Process** (#20-0831), published August 25, 2022

B| Community Services

1. Audit of the Department of Family and Support S**ervices'** Strategic Contracting (#20-1629), published August 9, 2022

2. **Audit of the Department of Planning and Development's** Administration of the Neighborhood Opportunity Fund Small Grants Program (#21-0395), published December 28, 2022

C| Finance and Administration

1. Advisory **Concerning the City of Chicago's Data Quality** (#21-1035), published February 1, 2022

2. Follow-**Up to OIG's Audit of the Municipal Depository Designation** Process (#C2022-000043978), published December 21, 2022

3. 3.   Follow-**Up to OIG's Audit of the City's Capital Improvement** Program Development and Evaluation (#C2022-000043821), published December 22, 2022

D| Infrastructure

1. Chicago Department of Transportation Traffic Signal Planning Audit Follow-Up (#21-2195), published March 9, 2022

E| Public Safety

1. Follow-Up to Audit of Policies and Practices Related to Discrimination and Sexual Harassment Within the Chicago Fire Department (#22-0209), published April 26, 2022

VI | Follow-Up Reports to Conduct in 2023

The following published reports will be evaluated for follow-up in 2023. 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. Audit of the City's Compliance with the Tax Increment Financing Sunshine Ordinance and Surplus Executive Order (published January 27, 2022)
2. Audit of City Council Committee and Employee Administration (published October 13, 2021)
3. Second OIG Audit of the Chicago Fire Department's Fire and Emergency Medical Response Times (published October 12, 2021)
4. Audit of the Public Building Commission's Administration of Building Commissioning (published September 23, 2021)
5. Audit of the Department of Buildings' Permit Inspections Process (published August 25, 2022)
6. Audit of the Department of Family and Support Services' Strategic Contracting (published August 9, 2022)
7. Chicago Department of Transportation Commercial Driveway Billing Audit (published July 1, 2019; first follow-up published April 21, 2020; second follow-up published August 5, 2021)
8. Audit of the Chicago Police Department and Department of Family and Support Services' Administration of the Juvenile Intervention and Support Center (published February 25, 2020; first follow-up published November 18, 2021)
9. Audit of the Department of Planning and Development's Administration of the Neighborhood Opportunity Fund Small Grants Program (published December 28, 2022)

VII | Projects in Progress

The following 13 projects are currently underway.

A| City Development and Regulatory

1. 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.

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 Chicago Department of Family & Support Services (DFSS) Homeless Encampment Outreach (#22-0078)

This audit evaluates whether DFSS coordinates and plans encampment cleanings and Accelerated Moving Events (AMEs) with partner agencies to help protect the rights of encampment residents. Further, the audit determines whether DFSS notifies encampment residents of encampment cleanings in accordance with City policy and that those who participate in AMEs receive housing, remain in housing for 12 months, and retain housing after the end of the program period.

C| Finance and Administration

1. Audit Regarding the **Status of Workers' Compensation Improvements** Recommended by Grant Thornton LLP (#22-0208)

This audit will determine whether the Department of Finance (DOF) has implemented corrective actions based on the recommendations made by Grant Thornton, LLP in its 2019 report on the workers' compensation program.

2. **Advisory Concerning the City's Reliance on Complaints to Provide City** Services (#C2022-000043808)

This advisory summarizes OIG's past encounters with the City's reliance on complaints and suggests improvements to promote a balance between complaint-based and proactive service provision.

3. Follow-Up of the Department of Human Resources (DHR) Employee Performance Evaluation Audit (#C2022-000044057)

This follow-up will determine the status of corrective actions proposed by DHR in response to the 2020 Employee Performance Evaluation audit.

4. **Advisory Concerning the City's** Interdepartmental Coordination (#C2022-000044054)

This advisory summarizes OIG's past observations regarding interdepartmental coordination.

D| Infrastructure

1. **Audit of Department of Water Management's** (DWM) Sewer Cave-In Response (#22-0035)

This audit determines whether DWM addresses confirmed sewer cave-ins in a timely and equitable manner.

2. Follow-Up of the Department of Streets and Sanitation (DSS) Commercial and High-Density Residential Recycling Enforcement Audit (#C2022-000043938)

This follow-up will determine the status of corrective actions regarding the 2020 audit of DSS's commercial and high-density residential recycling enforcement.

3. **Advisory Concerning the Department of Transportation's (CDOT)** Design and Maintenance of Bike Lanes (#22-0087)

This advisory will describe CDOT's processes related to the design and maintenance of bike lanes.

E| Public Safety

1. Audit of the Chicago Fire Dep**artment's (CFD) Fire Prevention Bureau's Inspection Processes** (#C2022-000043822)

This audit determines whether CFD's Fire Prevention Bureau completes required annual inspections of buildings, and required annual tests of sprinklers, standpipes and fire pumps. This audit also determines whether the Bureau notifies building owners of noncompliance, collects re-inspection fees, conducts follow-up inspections of known issues, and maintains complete and accurate records.

The City of Chicago Office of Inspector General 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'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. For further information about this report, please contact the City of Chicago Office of Inspector General, 740 N. Sedgwick Ave., Suite 200, Chicago, IL 60654, or visit our website at igchicago.org.

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