



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

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Audit of the Department of Human Resources' Employee Assistance Program Follow-up

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I | Introduction

The City of Chicago Office of Inspector General (OIG) has completed a follow-up to its April 2025 audit of the Department of Human Resources' (DHR) Employee Assistance Program (EAP). Based on DHR's responses, OIG concludes that DHR has partially implemented one corrective action, substantially implemented another, but not implemented three other corrective actions related to the audit findings.

The purpose of the 2025 audit was to determine whether DHR designed and administered the EAP to address the needs of the City's workforce and comply with recordkeeping requirements. OIG found that DHR had no documented policies and procedures to guide operations and ensure consistent, standardized service delivery for the City's civilian EAP.¹ In addition, OIG found that although DHR worked with the Department of Technology and Innovation (DTI) to identify and address data security issues regarding sensitive EAP information, DHR had not documented internal policies to ensure it would continue to protect this information and comply with legal requirements.

Based on the results of the audit, OIG recommended that DHR,

- assess and document the EAP needs of the City's workforce to account for demographics and work location, going beyond merely gathering historical usage information from the program itself;
- set program goals informed by its assessment of workforce needs and collect relevant data to monitor the program's progress toward these goals;
- develop policies and procedures to ensure consistent service delivery;
- regularly review and update the list of external agencies to which the EAP refers clients for additional services, to ensure it is complete and accurate; and
- partner with DTI to document policies and procedures that standardize EAP staff responsibilities around data security and ensure ongoing compliance with the Health Information Portability and Accountability Act (HIPAA) Security Rule.²

In its response to the audit, DHR stated that it had requested that the City reclassify the clinical therapist position to create an EAP counselor position. This role would provide oversight of the EAP program in addition to delivering counseling. DHR stated that it would be the responsibility of the EAP counselor to conduct an assessment of the needs of the City's workforce, determine the program goals and key performance metrics based on the assessment, develop policies, procedures, and outreach plans, and update the EAP referral lists. DHR stated that it would develop standard operating procedures to ensure EAP recordkeeping complies with HIPAA.

In June 2026, OIG inquired about corrective actions taken by DHR in response to the audit. Based on its follow-up response, OIG concludes that DHR partially implemented one corrective action, substantially implemented another, but not yet implemented three other corrective actions. Figure 1 reflects the status of DHR's corrective actions for each recommendation.

¹ The Chicago Police Department and the Chicago Fire Department have their own dedicated EAPs. Employees of those departments are not eligible for DHR's program for civilian employees.

² U.S. Department of Health and Human Services, "The HIPAA Security Rule," October 20, 2022, accessed August 11, 2026, <https://www.hhs.gov/hipaa/for-professionals/security/index.html>.

Figure 1: Summary of Recommendations and Status of Corrective Actions

OIG Recommendation	Status of Corrective Actions
1. Assess and document the EAP needs of the City's workforce.	Partially Implemented
2. Set EAP program goals that are informed by its needs assessment and collect relevant data to monitor the program's progress towards these goals.	Not Implemented
3. Develop policies and procedures that ensure incoming staff are trained and EAP services are delivered consistently.	Not Implemented
4. Regularly review and update the list of external agencies to which EAP refers clients for additional services, to ensure it is complete and accurate.	Substantially Implemented
5. Work with DTI to document policies and procedures identified by the City's risk analysis to standardize EAP staff responsibilities around data security and ensure ongoing compliance with the HIPAA Security Rule.	Not Implemented

Specifically, DHR has surveyed 158 City employees to assess the EAP needs of the City's workforce and updated the list of external EAP referral agencies to ensure its accuracy. OIG urges DHR to set program goals informed by its assessment of workforce needs, collect relevant data to monitor the program's progress toward these goals, and develop policies and procedures to ensure consistent service delivery and to maintain compliance with the HIPAA Security Rule. Below, OIG summarizes its two audit findings and recommendations, as well as DHR's response to the follow-up inquiry.

OIG thanks the staff and leadership of DHR for their cooperation during the audit and their responsiveness to the follow-up inquiries.

II | Follow-Up Results

In June 2026, OIG followed up on its April 2025 audit of DHR's Employee Assistance Program.³ DHR responded by describing the corrective actions it has taken and providing supporting documentation. Below, OIG summarizes the two original findings, the associated recommendations, and the status of DHR's corrective actions in response to those recommendations. OIG did not observe or test implementation of the new procedures in this follow-up; thus, it makes no determination as to their effectiveness, which would require a new audit with full testing.

| Finding 1: DHR has not positioned its Employee Assistance Program to meet the needs of the City's workforce.

OIG Recommendation 1 |

OIG recommended that DHR assess and document the EAP needs of the City's workforce. This assessment should take into account Citywide workforce data including demographics and work locations, and go beyond merely gathering historical usage information from the program itself.

State of Corrective Action 1 | Partially Implemented

DHR gathered employee feedback to assess the EAP needs of the City's workforce. In June 2026, DHR helped organize and host Employee Wellness Week, a series of events designed to support mental, emotional, and physical well-being. DHR surveyed participants to evaluate the events of Wellness Week, but also to determine employee needs related to the EAP. The department collected 158 responses from employees on,

- the wellness concerns that most impact employees in their workplace;
- barriers that prevent employees from utilizing the EAP;
- preferences for accessing wellness and EAP services; and
- additional supports or resources that would be most helpful for employees.

Using these survey results, DHR has identified some common wellness needs for City employees—for example, stress and burnout—and begun developing resources related to these needs. The survey also identified lack of awareness of EAP services as a significant barrier; DHR in turn described a plan to increase employee awareness of EAP through newsletters and social media platforms. The 158 respondents were a subset of the 204 employees that had individually chosen to attend Wellness Week. While this group of respondents could broadly reflect the City workforce as a whole, DHR did not demonstrate how it determined that this survey would be sufficient for assessing the wellness needs of the entire workforce.

DHR's survey collected the department where each respondent worked, but did not collect demographic or work location information from employees. Without collecting additional demographic information, DHR lacks assurance it has comprehensively identified the wellness needs of the City's diverse and dispersed workforce.

³ City of Chicago Office of Inspector General "Audit of the Department of Human Resources' Employee Assistance Program," April 17, 2025, <https://iqchicago.org/publications/dhr-eap-audit/>.

OIG Recommendation 2 |

OIG recommended that DHR set EAP program goals that are informed by its needs assessment and collect relevant data to monitor the program's progress towards these goals.

State of Corrective Action 2 | Not Implemented

DHR has not yet developed EAP program goals. The department stated that it is in the process of developing goals, which should be finalized by December 2026. Meanwhile, it has established key performance indicators that track,

- new clients;
- sessions held;
- calls for information;
- participation in City events; and
- onsite crisis support provided.

The EAP also tracks how many cases have been opened, closed, are ongoing, and require follow-up. Yet without goals for this program, these metrics alone do not provide a meaningful measure of the program's success nor inform DHR where it may need to improve the program.

OIG Recommendation 3 |

OIG recommended that DHR develop policies and procedures that ensure incoming EAP staff are trained and EAP services are delivered consistently. Among general program policies and procedures, these should also include expectations for:

- the method and schedule for needs assessments;
- periodic evaluation of program goals;
- a departmental outreach plan informed by the needs assessment; and
- appropriate follow-up with clients after treatment or referral to assess program outcomes.

State of Corrective Action 3 | Not Implemented

DHR has not yet developed EAP policies and procedures for training and service delivery. DHR stated that it intends to develop the EAP policy and associated protocols by the end of 2026. In preparation for developing its policy, DHR has reviewed EAP policies from other government agencies, including those within the City with their own EAPs (i.e., Chicago Fire Department, Chicago Police Department, and the Office of Emergency Management and Communications).

OIG Recommendation 4 |

OIG recommended that DHR regularly review and update the list of external agencies to which EAP refers clients for additional services, to ensure it is complete and accurate.

State of Corrective Action 4 | Substantially Implemented

DHR has updated its list of social services agencies for EAP referral. The list includes contact information and websites for 28 different agencies and the ability to sort by type of service offered. While this list used to live with the EAP clinical therapist, it can now be independently accessed by

all City employees through the Human Resources option within the Department tab on the City of Chicago employee intranet page.

DHR stated that it is developing a process for periodic review and verification of the entities on the resource list.

| Finding 2: While DHR has worked with DTI to ensure sensitive data is secure, DHR has not documented its related internal policies.

OIG Recommendation 5 |

OIG recommended that DHR work with DTI to document policies and procedures identified by the City's risk analysis to standardize EAP staff responsibilities around data security and ensure ongoing compliance with the HIPAA Security Rule.

State of Corrective Action 5 | Not Implemented

DHR has not yet documented policies and procedures to standardize data security responsibilities that ensure ongoing compliance with the HIPAA Security Rule. In its review of data security procedures with DTI and the Department of Law, DHR determined that it first needed to formally document the EAP's permitted and required uses of personal health information. Once documented, DHR stated that it will create standard operating procedures for EAP recordkeeping to ensure HIPAA compliance.

III | Conclusion

Through its corrective actions, DHR has taken the initial steps to address the wellness needs of the City's workforce. The department now has some information about the wellness issues that impact City employees and the barriers preventing them from accessing EAP services. DHR should expand its outreach and data collection on wellness needs to ensure it collects feedback from a diverse sample of City employees. DHR has also corrected its list of referral agencies and made it directly available to all City employees. OIG urges DHR to continue implementing corrective actions around establishing goals for the EAP and collecting data to monitor progress toward these goals. In addition, DHR should develop policies and procedures to ensure EAP staff consistently deliver services and maintain records in compliance with the HIPAA Security Rule.



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