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OFFICE OF THE INDEPENDENT INSPECTOR GENERAL

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July 15, 2015

Honorable Toni Preckwinkle
and Members of the Board of Commissioners
of Cook County, Illinois
118 North Clark Street
Chicago, Illinois 60602

Re: Independent Inspector General Quarterly Report (2nd Qtr. 2015)

Dear President Preckwinkle and Members of the Board of Commissioners:

This report is written in accordance with Section 2-287 of the Independent Inspector General Ordinance, Cook County, Ill., Ordinances 07-O-52 (2007), to apprise you of the activities of this office during the time period beginning April 1, 2015 through June 30, 2015.

OIIG Complaints

The Office of the Independent Inspector General (OIIG) received a total of 97 complaints during this reporting period.¹ Please be aware that 10 OIIG investigations have been initiated. This number also includes those investigations resulting from the exercise of my own initiative (OIIG Ordinance, Sec. 2-284(2)). Additionally, 30 OIIG case inquiries have been initiated during this reporting period while a total of 171 OIIG case inquiries remain pending at the present time. There have been 6 matters referred to management or other enforcement or prosecutorial agencies for further consideration.

In connection with the recently opened investigations by the OIIG, the following is a general description of the issues and allegations under review:

- The submission of false employment records (2 cases);

¹ Upon receipt of a complaint, a triage/screening process of each complaint is undertaken. In order to streamline the OIIG process and maximize the number of complaints that will be subject to review, if a complaint is not initially opened as a formal investigation, it may also be reviewed as an "OIIG inquiry." This level of review involves a determination of corroborating evidence before opening a formal investigation. When the initial review reveals information warranting the opening of a formal investigation, the matter is upgraded to an "OIIG Investigation." Conversely, if additional information is developed to warrant the closing of the OIIG Inquiry, the matter will be closed.

- Post-SRO complaint within the Department of Public Health;
- Cook County Employment Plan violations;
- Employee theft;
- Review of HHS Procurement Process;
- The submission of false accident reports (2 cases)
- Equal Pay Act violations; and
- Irregularities in connection with a Request for Proposal and contract award.

The OIIG currently has a total of 56 matters under investigation. The number of open investigations beyond 180 days of the issuance of this report is 51 due to various issues including the nature of the investigation, availability of resources and prosecutorial considerations.

OIIG Summary Reports

During the 2nd Quarter of 2015, the OIIG issued 11 summary reports. The following is a general description of each matter and whether an OIIG recommendation for remediation/discipline has been adopted, if applicable, due to the time permitted for corrective action. Specific identifying information is being withheld in accordance with the OIIG Ordinance where appropriate.

IIG13-0417. This case was initiated based on a complaint alleging that a vendor providing vehicle maintenance for the Sheriff's Office had obtained its contract through fraud in the procurement process. Specifically, the complainant (another vendor) alleged that the subject vendor intentionally underbid for the contract knowing it could not provide the services at such rates and then made up the difference through fraudulent billing practices. Although our investigation did reveal some relatively minor errors in invoices, there was no evidence to support the allegations of fraud in the procurement process. However, based on the errors discovered, the Sheriff's Office reviewed additional invoices by the subject vendor and other vendors and found additional problems in invoices that had been submitted for similar work. Based on these results, the Sheriff's Office stated it will perform audits on vendor invoices and conduct random spot-checks on completed services. The efforts of the Sheriff's Office to address and resolve issues regarding its vehicle maintenance service program are positive and supported by this office. We recommended that the Sheriff's Office continue to conduct intermittent audits on vendor invoices and perform random checks on work performed.

IIG14-0312. This case was initiated after the OIIG received an anonymous complaint alleging numerous unidentified employees of the Stroger Hospital Emergency Room (ER) had been observed arriving late and/or leaving early from their shifts in the ER. It was alleged that the subject employees were swiping in at time clocks that are not at their ER worksite prior to parking their vehicles and then arriving at work after their shifts began. At the end of the workday, employees allegedly went to the garage, picked up their vehicles and then swiped out at remote locations before leaving the hospital campus.

During the course of this investigation, the OIIG conducted a review of the time and attendance entries relating to 48 employees assigned to the Stroger ER and cross-referenced the data with the entry and departure records of the ER personnel who utilize one of the CCHHS parking facilities. Our analysis determined that of the 48 ER employees whose records were analyzed, 15 employees did not have parking records for purposes of comparison with their time clock records. Of the remaining 33 employees reviewed, two were found to have discrepancies in their records indicating possible timekeeping fraud. (These matters will be the subject of separate inquiries). There was no indication of timekeeping fraud for the other 31 employees.

IIIG14-0349. In this case, the OIIG received a complaint alleging that a Storekeeper at Stroger Hospital had been arrested and convicted of Domestic Battery in August of 2013 and did not report his conviction to CCHHS. The complainant also alleged that the Storekeeper had stolen a wheel chair, lumber, diapers and numerous other items that belonged to CCHHS. The complainant further alleged that the Storekeeper submitted a fake high school diploma during his hiring process with Cook County government. The OIIG investigation revealed that the subject Storekeeper did not submit a fake high school diploma but that he had in fact been arrested and convicted of Domestic Battery in violation of CCHHS Personnel Rules. When questioned during his OIIG interview regarding the allegations of theft of hospital supplies, the subject Storekeeper asked to continue his interview for a later date so he could obtain union representation. Although the interview was continued for that purpose, when it resumed, the subject Storekeeper refused to answer any questions regarding the theft of hospital property despite being advised that his refusal to answer violated his obligation as an employee of Cook County government to comply with an investigation conducted by the OIIG. The Storekeeper's refusal to cooperate with the OIIG is a violation of the County's OIIG Enabling Ordinance and a Major Cause infraction of the CCHHS Personnel Rules. Accordingly, due to the severity of the violation, termination of employment and placement on the CCHHS Do Not Rehire List was recommended. These recommendations are currently pending.

IIIG14-0380. The OIIG opened this investigation after receiving a complaint from a County vendor who alleged that the director of a Cook County agency expressed a preference for a particular vendor that partners with some of the complainant's competitors. According to the complainant, the alleged bias by the subject director gives certain vendors an unfair advantage in the procurement process. The complainant also alleged other improprieties in the procurement process on certain contracts on which it submitted proposals.

The evidence from the investigation did not support a finding of any misconduct by the subject director. However, the investigation did cause concern that a competing vendor caused the County to reconstitute the Evaluation Committee by raising allegations that were unverified. In this regard, when faced with serious allegations of bias, the subject agency responded by removing the subject director from the Evaluation Committee without seeking additional information or clarification regarding the allegations. Up until that point, the director had served as an integral part of the process. The agency's decision was undoubtedly made in good faith. However, further due diligence should have been performed to determine whether or not the

allegations had merit before removing the subject director from the Evaluation Committee. Accordingly, we recommended that the procurement process include a mechanism affording careful consideration to the merits of any allegation of conflict of interest or bias before substantially reconstituting the Committee. We also noted that the County may elect to extend the reporting requirements of Section 34-250 of the Procurement Code to include not only reporting suspected or known fraudulent activity to the OIIG, but also any complaints alleging conflicts of interest or bias.

IIG14-0485. This office received a complaint asserting that even though certain Cook County Health and Hospitals System (CCHHS) contracts had expired, the vendors continued to provide services without compensation until months later when the CCHHS Board of Directors approved retroactive “extend and increase” contracts. This alleged practice allows vendors to receive payment for services for work performed during a period when no active contract is in place and without competitive bidding.

The evidence from the investigation suggested the likelihood that the using department officials and/or procurement officials violated CCHHS Supply Chain Management Procurement Policy Section 1.2 by failing to properly manage contracting when vendors continue to provide services and goods in excess of \$150,000 after contract expiration without System Board approval. This circumstance also implicates Procurement Policy Section 2.2 because the practice results in the mandatory competitive bidding process not being utilized.

We recommended that CCHHS management place a high priority to eliminating reliance on retroactive “extend and increase” contracts and strive to secure goods and services through the competitive bidding process whenever possible and noted that the timeliness of procurement action is the key to resolving this issue. We recommended that management determine if a more expansive use of the currently available contract tracking tool would aid in alleviating this problem until a comprehensive “contract management system” is finally put into place. Finally, we recommended that management actively enforce the important competitive bidding rules and pursue disciplinary action for violations of same.

IIG14-0497. This investigation involved a Post-SRO complaint filed pursuant to the *Supplemental Relief Order for Cook County* (“SRO”) entered in connection with the *Shakman v. Cook County*, 69 C 2145 (N.D. Ill.) litigation. The complainant is an employee in the Cook County Department of Public Health who claimed that she has been unfairly undercompensated and unfairly treated by colleagues and supervisors by being required to perform work that was outside her job description. Additionally, the complainant asserted that she was retaliated against when her job status was converted from Career Service status to an Exempt status. After conducting its investigation and analyzing the timeliness of the complainant’s claim, the OIIG determined that certain allegations of the complaint were not subject to review because of the application of the limitations period specified in Section V of the SRO. As for the remaining claims, the OIIG determined that the complainant was not subject to an adverse employment action because she had not lost Career Service protection.

IIG15-0041. In this matter, the OIIG received information that a Seasonal Driver with the Department of Highways and Transportation was involved in a vehicular accident while operating a snowplow which resulted in damage to another motorist's vehicle. During a verbal exchange with the motorist, the Seasonal Driver allegedly offered the motorist money for the damage to her vehicle to avoid reporting it to his supervisors.

During his OIIG interview, the Seasonal Driver described what occurred at the site of the alleged accident, including statements allegedly made by a local police officer who arrived at the scene. The Seasonal Driver specifically denied hitting the other motorist's vehicle and stated he did not recall his conversation with the motorist other than that she was going to call the police and he was going to contact his supervisor. Evidence obtained from the OIIG investigation contradicted statements made by the Seasonal Driver and revealed that he was not truthful during his OIIG interview. The evidence supported the conclusion that the Seasonal Driver violated the County ordinance requiring cooperation during an OIIG investigation and violated various County Personnel Rules, including those relating to insubordination and negligence. Based on these findings, the OIIG recommended that the subject employee be terminated from Cook County employment and be placed on the County's Do Not Hire List.

IIG15-0041A. This investigation involves two supervisors in the Department of Highways and Transportation who submitted reports relating to a Seasonal Driver who was involved in a vehicular accident while operating a snowplow which resulted in damage to another motorist's vehicle. The OIIG investigation revealed that the two supervisors failed to include material information in their reports of the incident. Specifically, the supervisors failed to include information that the Seasonal Driver offered money to the other motorist in an attempt to avoid reporting the incident to his supervisors within the department. Such conduct violates Cook County Personnel Rules relating to negligence in the performance of duties. Based on our findings, we recommended the imposition of discipline upon the subject supervisors.

IIG15-0053. The OIIG received a Request to Hire ("RTH") packet in conjunction with the direct appointment for a legal position at the Cook County Health and Hospitals System (CCHHS). The position requires minimum qualifications, including that the candidate possess at least seven years of specified work experience in labor relations, human resources, litigation or other related field. During a routine audit of the application materials associated with the RTH, this office noted that, although the appointed candidate for the position possessed at least six years of required experience, it was unclear whether she possessed the required seven years. Moreover, this office noted the possibility that subject's experience as a law clerk was being relied upon to satisfy the litigation requirement for the position. Accordingly, this office opened an inquiry to determine whether the appointed candidate possessed the requisite experience. During the investigation, OIIG investigators noted discrepancies between the number of hours of relevant work experience by the subject candidate as reported by her former employer and by the subject candidate herself on various applications for employment with Cook County government as well as to OIIG investigators. These discrepancies became a further area of inquiry.

Although the evidence obtained during the investigation was insufficient to support the conclusion that the subject candidate knowingly provided false information to the OIIG, it did reveal that she recklessly overstated her hours of relevant work experience to ensure she met the minimum qualifications for the position at issue in violation of CCHHS Personnel Rules. Disciplinary action was recommended.

IIG15-0055. The OIIG initiated this investigation after receiving information that an interview panelist for the Public Defender ("PD") looked at her ringing phone during a hiring sequence and commented that it was a judge calling because his clerk had interviewed with the PD's office the day before. During the OIIG investigation, the subject interview panelist stated that she had initiated contact with the judge because he was listed as a reference on a candidate's resume and that she personally knew the judge. She further stated that she only calls listed references known to her because she believes that she can only trust the opinions of people she knows.

The preponderance of the evidence developed during the course of this investigation revealed that the subject interview panel member, selectively contacted a judge, a political person, regarding an employment action concerning a non-exempt position and solicited a verbal recommendation from him regarding a candidate. Such conduct was not authorized by the Employment Plan and violates the provisions of the Employment Plan requiring that recommendations be in writing, be reviewed by the Cook County Bureau of Human Resources Chief and Compliance Officer, and be forwarded to the OIIG and Compliance Administrator (if they are political in nature). Not only does the interview panel member's conduct here create a violation of the Employment Plan, it is made worse by the fact that she stated that she only considers references with whom she is personally acquainted. No matter how intentioned, this conduct may be viewed as and is arguably akin to the old time patronage attitude of "we don't want nobody nobody sent." That is, those candidates who share a common acquaintance with the interview panel member have better access to public employment than those who do not. The fact that the personal acquaintance in this case was a political person only makes that perception worse.

Based on these findings and conclusions, this office recommended that the subject interview panel member undergo additional Employment Plan training so as to end any practice of privately contacting references. The Public Defender has adopted these recommendations.

IIG15-0078. In this case, OIIG received information that a Clerk with the Cook County Department of Adoption and Child Custody Advocacy gave false information in certain employment applications with Cook County government. Specifically, the Clerk allegedly asserted in those applications that she possessed an associate's degree when she did not have one.

During the investigation, OIIG investigators obtained copies of the subject Clerk's employment records and subpoenaed records from the university attended by the subject Clerk.

During her OIIG interview, the Clerk was asked about discrepancies between her employment and university records, and the Clerk admitted that she provided false information on her employment application materials in order to pass the screening stage of the application process in at least one instance. The investigation revealed that the Clerk had provided false information in the employment application process with not only Cook County, but also with the Cook County Forest Preserve District (FPD) and the Cook County Health and Hospitals System (HHS). The Clerk's conduct constitutes a violation of both County ordinance and the respective Personnel Rules for the County, the FPD, and HHS. Accordingly, we recommended that the Clerk be terminated from her current County position and be placed on Do Not Hire List for not only the County, but also the FPD and HHS. In addition, we recommended that the Employment Plans for the County, the FPD and HHS be modified so as to mutually honor the respective ineligibility lists of other Cook County government entities.

Outstanding Recommendations

In addition to the new cases being reported for this quarter, the OIIG has followed-up on outstanding recommendations for which no response was received at the time of our last quarterly report. Under the OIIG Ordinance, responses from management are required within 30 days of an OIIG recommendation. Below is an update on these outstanding recommendations.

IIG10-0038. This matter involved a follow-up to a prior case and recommendation involving several county officials directing third party contractors to hire favored individuals in an effort to circumvent the scrutiny that would prevent the hiring of such individuals into Cook County positions. We recommended amending the County's Employment Plan or Human Resources Ordinance to prevent such circumstances from recurring. This recommendation was made on November 7, 2014, and the OIIG had not yet received a response from the County.

IIG13-0015. The OIIG recommended that the Letter of Intent in County contracts require specific information to support the commercially useful function that will be performed under the contract including, but not limited to, the deliverables and time table for performance. We also strongly recommended that protocols should be established to include user agencies in monitoring and reporting M/WBE participation as part of their project management responsibilities. In addition, the OIIG restated its previous recommendation that Cook County government implement a policy, resolution or enactment to the Code of Ordinances to require County employees involved in the contracting process to report to this office instances in which contact is made by a politically-related person or organization that involves an attempt to influence a procurement action. This recommendation was made on December 12, 2014, and the County has not yet provided a response to it.

IIG13-0053. Based on the possibility of conflicts of interest and the appearance of impropriety within the Board of Review (BOR), the OIIG recommended (i) that the BOR should enact a provision in the BOR Ethics Policy prohibiting BOR Commissioners (and those running for such office) from soliciting or accepting campaign contributions from attorneys and litigants

who appear before them, (ii) that, should the BOR elect to reject the first recommendation, the BOR should consider whether policies can be implemented for the recusal of BOR Commissioners who receive campaign contributions from attorneys and litigants who appear before them; and (iii) the BOR should revise the BOR Ethics Policy to include BOR officials and not just employees to the prohibitions against conflicts of interest and to avoiding the appearance of impropriety and to extending the mandatory written disclosure requirement of such conflicts or potential conflicts to BOR officials. These recommendations were made on March 24, 2015, and the BOR has not yet responded to the OIIG regarding them.

IIG14-0053. The OIIG recommended that the Cook County Health and Hospitals System (CCHHS) pursue contract cancellation and disqualification and possibly pursue the imposition of fines in accordance with Section 6.7 of the CCHHS Supply Chain Management Procurement Policy (False Statements) for a prime contractor who violated the Minority and Women Owned Business Enterprises (M/WBE) provisions of the Cook County Code and CCHHS Procurement Policy. This recommendation was made on August 28, 2014, and CCHHS has not yet provided a response.

IIG14-0060. After finding evidence that an elected official sought to influence an employment action involving a non-exempt position in Cook County government in violation of Section 44-56 of the Cook County Code for a relative, our office recommended continued training for the elected official on these issues. The elected official adopted our recommendation and agreed to participate in further training regarding unlawful political discrimination.

IIG14-0186. After finding material deficiencies in connection with the inventory of patient valuables at Provident and Stroger Hospitals and the program protocols to properly manage the collection, maintenance and return/disposal of patient property, the OIIG made several recommendations for hospital officials to establish a uniform policy designed to properly manage patient property including the implementation of verification procedures, the installation of surveillance cameras, and updating the current inventory tracking system. CCHHS has requested an extension of time to respond to pending recommendations and has indicated that amended policy is forthcoming.

IIG14-0266. A review revealed that the offices under the Office of the President were generally in compliance with the Fair Labor Standards Act (FLSA) and the County's related Supplemental Policy. However, payroll information revealed there were 32 FLSA exempt employees within nine departments who had earned compensation time and/or overtime either before or after August 1, 2013. Several other issues pertaining to time and attendance (tardiness, docked time, flex time and advance leave) were identified and include varied treatment among the departments.

Based upon the findings and conclusions of the review, the survey team made the following recommendations regarding FLSA/Supplemental Policy: (1) Cook County should consider issuing a clear statement reinforcing that FLSA exempt employees are not entitled to

compensation time, overtime and days off in lieu of time worked over 40 hours per work week, (2) Cook County should ensure that relevant staff receive annual training regarding the FLSA and the Supplemental Policy, and (3) Cook County should issue guidance regarding those FLSA exempt employees who earned compensation time and overtime prior to August 1, 2013. With respect to time and attendance issues, we made the following additional recommendations: (1) Cook County should consider establishing uniform policies to guide directors in managing tardiness issues absent specific requirements contained in the Collective Bargaining Agreements, (2) Cook County should consider developing a flex time policy, (3) the Comptroller's Office along with Human Resources should coordinate their efforts to establish standard payroll and time keeping policies and procedures to ensure there are uniform answers to time and attendance issues; and (4) Cook County should address the practice of advancing leave and consider eliminating the practice entirely due to the potential liability if an employee leaves County service prior to accruing sufficient time to pay back the advanced leave.

The OIIG made its initial recommendations on February 2, 2015. As of the date of this report, the County's response remains outstanding.

IIG14-0382. After receiving a complaint that three employees in CCHHS were stealing diapers, milk and other inventory out of the supply rooms, the OIIG recommended that CCHHS implement an internal control system to assist in safeguarding the supplies. CCHHS adopted the OIIG recommendations.

IIG14-0450. The OIIG recommended that a Collections Analyst with the Cook County Department of Revenue be terminated and placed on the County's Do Not Hire List for falsifying her employment records. The County adopted our recommendations and the subject employee was terminated from County employment.

IIG14-0461. In this matter, the OIIG recommended that Cook County adopt job descriptions for members of the Cook County Employee Appeals Board. The job descriptions should be made subject to the provisions of the Employment Plan regarding exempt employees (Employment Plan, Art. XII). We further recommended that the job descriptions account for the varied responsibilities of members and incorporate minimum qualifications which reflect education and experience regarding employment law, Human Resources and contested evidentiary hearings. Finally, we recommended that the job descriptions require an amount of previous education and experience which recognizes the significant power and authority held by each Member to receive evidence at an evidentiary hearing and issue rulings on employee appeals. The County responded to the OIIG Summary Report stating that it considered the OIIG recommendations but would decline to adopt them.

IIG14-0465. The OIIG recommended that the County, the Forest Preserve District (FPD), the Health and Hospitals System (HHS), and the Recorder of Deeds place on their respective Do Not Hire Lists an applicant for employment who routinely and admittedly falsifies

her employment applications. We also recommended that each affected County entity seek to modify their respective Employment Plans so as to mutually honor the ineligibility lists of the other Cook County government entities. The Recorder of Deeds responded that it could not act on our recommendation at the present time as the parameters of its Do Not Hire List under its Employment Plan are currently under negotiation with the Recorder's Compliance Administrator. The FPD responded by adopting the recommendation to place the subject on its Do Not Hire List and agreed to further explore the concept of amending its Employment Plan as recommended. The County has not yet responded to the OIIG recommendations which were originally made on February 2, 2015.

IIG14-0501. After finding the existence of reoccurring incidents of time card fraud at the Cook County Health and Hospitals System (CCHHS) directly related to both the lack of supervisory oversight and corresponding efforts to detect misconduct and impose disciplinary action, we made a number of recommendations to address this problem including training and better enforcement policies and techniques. CCHHS responded on February 11, 2015 that it has convened a committee of representatives to address the issues raised by the OIIG and that a supplemental response regarding new policies and training and enforcement will be forthcoming at a later date. To date, we have not received an update since the initial response.

IIG15-0003. After finding that a local private, non-profit organization received a substantial direct benefit from hundreds of hours of labor by County employees and persons in the Sheriff's Work Alternative Program and the use of County assets in order to move its property from Chicago to a suburban location, the OIIG recommended that the practice of using County resources to benefit outside private organizations be discontinued. By letter dated April 27, 2015, the County rejected our recommendation but stated that, in an effort to ensure ongoing transparency and appropriate use of County resources, efforts will be undertaken to ensure Board authorization of such engagements prior to providing County services or funds in the future.

IIG15-0062. The OIIG investigation revealed that CCHHS had fallen out of compliance with its Procurement Policy by failing to maintain a Public Communication Log. The policy requires that communications from individuals, including elected officials, outside the System regarding a purchase shall be memorialized and maintained in the procurement file. Our review of recorded entries for the years 2012 through 2015 revealed that although there were numerous contacts recorded for the years 2012 (i.e., 230 entries) and 2013 (i.e., 119 entries), there were suspiciously few contacts documented for 2014 (i.e., six) and 2015 (i.e., four as of January 23, 2015). The OIIG recommended that the CCHHS management take action to come into compliance with its Procurement Policy by maintaining the Procurement Public Communication Log completely and contemporaneously. CCHHS has adopted the OIIG recommendation.

Activities Relating to Unlawful Political Discrimination

Political Contact Logs (PCLs)

In April of 2011, the County implemented the requirement to file Political Contact Logs with the Office of the Independent Inspector General. The Logs must be filed by any County employee who receives contact from a political person or organization or any person representing any political person or organization where the contact relates to an employment action regarding any non-Exempt position. The IIG acts within his authority with respect to each

Political Contact Log filed. From April 1, 2015 to July 1, 2015, the Office of the Independent Inspector General received thirty-six Political Contact Logs.

Post-SRO Complaint Investigations

In the last quarter, the OIIG has received one additional Cook County *Shakman* Post-SRO Complaint and has issued one Summary Report (not sustained) regarding a Cook County *Shakman* Post-SRO Complaint. Three complaints are currently under investigation.

Training

The OIIG continues to collaborate with the Bureau of Human Resources (“BHR”) and the Board of Ethics (“Ethics”) in a joint project to provide both online and in-person annual training for Cook County employees regarding the Ethics Ordinance, the Employment Plan and Unlawful Political Discrimination. The OIIG has been both monitoring and participating in the implementation of the training. Additionally during this period, the OIIG continued its collaborative efforts with the CCHHS Employment Plan Officer in conducting training sessions for CCHHS personnel.

New UPD Investigations not the result of PCLs or Post-SRO Complaints

In addition to the PCL and Post-SRO activity discussed above, the OIIG has opened seven additional UPD matters during the last reporting period on the exercise of our own discretion in accordance with the OIIG Ordinance. The OIIG continues to assist and work closely with the embedded compliance personnel in the FPD, CCHHS and the Cook County Bureau of Human Resources, conducting joint investigations where appropriate.

Employment Plan – Do Not Hire Lists

Since the last report, the OIIG has continued to collaborate with the County regarding Employment Plan provisions concerning Do Not Hire lists and has collaborated with the Bureau of Human Resources in creating its list. The OIIG has also made recommendations to Cook

County, the Forest Preserve District, the Cook County Health and Hospital System and the Cook County Recorder of Deeds regarding the need for uniformity and reciprocity of lists among the various entities.

OIIG Review per Employment Plans

In accordance with the Cook County, CCHHS and Forest Preserve District Employment Plans, the OIIG reviews, *inter alia* (1) the hire of *Shakman* Exempt employees, (2) proposed changes to Exempt Lists, Actively Recruited lists, Employment Plans and Direct Appointment lists, (3) FPD employment postings limited to internal candidates and (4) Supplemental Policy activities. In the last quarter, the OIIG has reviewed and acted within its authority regarding:

1. The hiring of 11 *Shakman* Exempt Cook County employees;
2. The hiring of one *Shakman* Exempt FPD employee;
3. The Direct Appointment of 10 CCHHS employees;
4. Eighty-two proposed changes to the CCHHS Actively Recruited List;
5. Six actions under the Employment Plan Supplemental Policies;
6. Eight proposed changes to the CCHHS Direct Appointment List;
7. One proposed change to the CCHHS Employment Plan; and
8. One proposed change to the FPD Employment Plan.

Monitoring

The OIIG currently tracks all disciplinary activities in the FPD. In this last quarter, the OIIG tracked (and selectively monitored) over 56 disciplinary hearings and related grievances. Further, pursuant to an agreement with the Bureau of Human Resources and with the collaboration of the Cook County Compliance Officer, the OIIG tracks all hiring activity in the offices under the President, conducting selective monitoring of hiring sequences therein.

Miscellaneous

As you are aware, on August 21, 2014, the Cook County Circuit Court entered judgment in favor of the OIIG upholding the jurisdictional scope of the OIIG Ordinance in the matter of *Blanchard v. Berrios*, 2013 CH 14300 (Cir. Ct.). The Office of the Assessor has appealed the Circuit Court's judgment. The parties have recently completed briefing the issues in the Illinois Appellate Court. Oral argument has not yet been scheduled.

On April 24th, I joined the *Shakman* Compliance Administrator and HHS Employment Plan Officer to present to the HHS Board of Directors on *Shakman* compliance related issues. On May 27th, this office hosted a U.S. Department of State sponsored delegation of government leaders from Korea to examine the role and techniques utilized by the OIIG in combating fraud and promoting transparency and accountability in government.

Hon. Toni Preckwinkle and Members of the
Board of Commissioners of Cook County
July 15, 2015
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Thank you for your time and attention to these issues. Should you have any questions or wish to discuss this report further, please do not hesitate to contact me.

Very truly yours,



Patrick M. Blanchard
Independent Inspector General
(312) 603-0364

cc: Ms. Kimberly Foxx, Chief of Staff
Ms. Tasha Cruzat, Deputy Chief of Staff .
Ms. Laura Lechowicz Felicione, Special Legal Counsel
Dr. John Jay Shannon, Chief Executive Officer, Health and Hospitals System
Ms. Elizabeth Reidy, General Counsel, Health and Hospitals System
Ms. Deborah J. Fortier, HHS Associate General Counsel
Mr. Arnold Randall, General Superintendent, Forest Preserve District
Ms. Eileen Figel, Deputy General Superintendent, Forest Preserve District
Mr. Ranjit Hakim, Executive Director, Board of Ethics