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OFFICE OF THE INDEPENDENT INSPECTOR GENERAL

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October 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 (3rd 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 July 1, 2015 through September 30, 2015.

OIIG Complaints

The Office of the Independent Inspector General (OIIG) received a total of 100 complaints during this reporting period.¹ Please be aware that 12 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, 34 OIIG case inquiries have been initiated during this reporting period while a total of 162 OIIG case inquiries remain pending at the present time. There have been 4 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:

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 (4 cases);
- Unlawful Political Discrimination resulting from the filing of a Political Contact Log (1 case);
- Unlawful Political Discrimination (1 case);
- Misuse of grant funds (2 cases);
- Public resources used for private gain/theft (2 cases);
- Patient billing fraud (1 case); and
- Fraud in the administration of a quasi-judicial function.

The OIIG currently has a total of 55 matters under investigation. The number of open investigations beyond 180 days of the issuance of this report is 48 due to various issues including the nature of the investigation, availability of resources and prosecutorial considerations.

OIIG Summary Reports

During the 3rd Quarter of 2015, the OIIG issued 10 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.

IIG14-0398. This case was initiated based on a complaint alleging that the Cook County Department of Transportation and Highways (DTH) used Motor Fuel Tax (MFT) funds to pay for projects that had been deemed ineligible for such use by the Illinois Department of Transportation (IDOT). Our investigation confirmed that this was the case, and the allegations were sustained. Because the pattern of expending MFT funds in this manner is likely a violation of the Illinois Highway Code and could place the County at risk, we recommended that DTH cease and desist from using the MFT fund for such uses until the objections asserted by IDOT have been formally lifted. We also recommended that DTH reimburse the MFT fund for previous expenditures related to ineligible projects and ensure full compliance with IDOT rules and regulations. These recommendations are currently pending.

IIG14-0400. This case was initiated after the OIIG received information that last fiscal year a former official in the Cook County Department of Transportation and Highways (DTH) authorized the use of the Motor Fuel Tax (MFT) fund, a restricted account, to pay a suburban municipality for services without a resolution from the County Board. The evidence obtained in the investigation revealed that the allegations were correct and that the DTH official had in fact authorized the use of the MFT fund to pay a municipality without a resolution in violation of the Illinois Highway Code and applicable policies and procedures. The former official's replacement has taken corrective action to resolve these issues. As such, no further recommendations were made.

IIG14-0408. In this case, the OIIG conducted an investigation regarding a potential violation of the 1992 Consent Decree and Supplemental Relief Order (SRO) entered in *Shakman*

v. Cook County Recorder of Deeds, 69 C 2145 (N.D.Ill.). Specifically, the OIIG sought to determine whether impermissible political reasons or factors informed the decisions of the Office of the Cook County Recorder of Deeds (Recorder's Office) to continue to retain a high ranking official in the Recorder's Human Resources Department (HR) and to refrain from disciplining him in a manner consistent with the disciplinary action imposed upon other non-exempt employees within the office. The preponderance of the evidence developed during the investigation established that the Recorder's Office has an established custom and practice of treating the subject HR official differently than other non-exempt employees. For example, other non-exempt employees had their employment with the Recorder's Office terminated for failing to cooperate with the OIIG during an SRO investigation, whereas the subject HR official was allowed continued employment in the Recorder's Office despite a finding by the OIIG that the individual willfully provided false information during an SRO investigation and the existence of substantial evidence of poor performance by the subject HR official. The evidence also established that the subject HR official has a strong political affiliation with a prominent state representative, which affiliation was known to management within the Recorder's Office and considered when making employment decisions relating to the subject HR official. Accordingly, the allegations that the Recorder's Office violated the Federal Consent Decree and SRO were sustained, and it was recommended that the Recorder's Office cease and desist from further actions which constitute a violation of the 1992 Consent Judgment and *Supplemental Relief Order*. This recommendation is currently pending.

IIG14-0412. The OIIG opened this investigation after receiving a complaint asserting that a doctor within the Cook County Health and Hospitals System (CCHHS) was selling hearing aids to patients and benefitting financially from the sales. The evidence developed during the course of this investigation supports the conclusion that the subject doctor used CCHHS facilities and resources for personal purposes, engaged in non-CCHHS business and sales without prior authorization on CCHHS premises, violated the CCHHS Dual Employment policy, and committed theft through deception by falsifying his timekeeping records. We recommended that CCHHS place the subject doctor, who resigned during our investigation, on its Do Not Hire List and consider an action to recoup the \$9,989.64 in vacation and personal time that was paid out to him as a result of his efforts to disguise the nature of his leaves during employment. We also recommended that CCHHS create policies regarding the registration and payment of vendors, maintaining accurate payroll records, standardized pricing of sales to the public, and the prohibition of individuals approving their own time records and leave requests. These recommendations were made on September 2, 2015. CCHHS has not yet responded.

IIG14-0449. This office received an anonymous complaint alleging that a CCHHS employee assigned to Provident Hospital had accessed the CCHHS patient billing system to clear debts owed by patients in exchange for bribes. The preponderance of the evidence failed to support the allegation made. OIIG investigators examined the patient billing activity during the time period in question and were unable to identify evidence of fraud. Moreover, the patient billing system possesses safeguards that appear adequate to protect the patient billing system from the type of fraud alleged in this matter.

IIG14-0513. The OIIG opened this case after a homeowner alleged improper conduct by the Cook County Zoning Board of Appeals relating to a variance that was granted for property adjacent to his home. This office identified no evidence to substantiate the allegations by the homeowner. Rather, the evidence reviewed in this case indicates that the Zoning Board of Appeals adhered to its policies and procedures in connection with the subject variance application.

IIG15-0027. In this operational review, the OIIG analyzed the administration, operations, budget, programs, office practices and policies of the Cook County Department of Animal and Rabies Control. We also conducted interviews of current and former employees and interested third parties, desk audits and a review of best practices adopted by other jurisdictions in the United States. The findings, conclusions and recommendations resulting from this operational review are contained in a public statement issued by this office on August 21, 2015 which is available on our office's website. The Department of Animal and Rabies Control has been granted a 30 day extension to respond to the recommendations in the report.

IIG15-0051. This investigation was initiated by the OIIG based on a complaint alleging that an employee in the Health and Hospitals System (HHS) discriminated and harassed the complainant based on sexual orientation. The complainant alleged that the subject HHS employee (who was identified by general description only, not by name or title) refused to allow him to apply for a volunteer position at the hospital because the complainant was gay. OIIG investigators interviewed various employees within HHS and reviewed employment application files. The preponderance of the evidence developed in this investigation failed to support the allegations made by the complainant.

IIG15-0143. The OIIG opened this investigation following the receipt of information from an anonymous source alleging that the Forest Preserve District (FPD) had awarded a tree removal contract to a vendor who was later found to have sold the removed trees for profit to a lumber yard. This allegation raised the possibility that FPD employees had failed to follow FPD policies and procedures and that a contractor may have engaged in misconduct. During the course of this investigation, the OIIG interviewed FPD management officials and reviewed the subject Request for Proposal (RFP) to ascertain whether any restrictions on the method of disposal of the trees cut during the course of this project were in place and potentially violated. The allegations raised in this complaint were not sustained. FPD administrators explained that the goal of the FPD to identify contractors willing to dispose of cut trees in an ecologically sound manner was achieved and the past practice of permitting contractors to simply burn trees is now discouraged by the FPD. Moreover, no violations were identified in connection with the RFP and contract concerning the required method of tree disposal.

IIG15-0187. The OIIG received a Political Contact Log regarding a verbal conversation occurring between an elected official and a hiring manager during which the elected official sought to influence the hiring of a particular applicant into a non-exempt position. The applicant was a personal acquaintance of the official. The elected official had previously received a telephone call from the applicant who was a childhood friend of the elected official but with

whom the elected official had not spoken in over ten years. The applicant explained that he was calling to inquire regarding a recently posted position in Cook County government. The elected official immediately informed the applicant that “it’s not like the old days,” meaning that the elected official could not assist the applicant in securing employment. The applicant later called the elected official a second time after being interviewed for the position. The applicant’s stated purpose for his second call was to ask for the spelling of the name of the hiring manager so he could send a follow-up thank you note. Several days after the telephone contacts with the applicant, the elected official was attending a series of meetings at which the hiring manager was also present. The elected official approached the hiring manager and stated “you just interviewed someone I’ve known for a long time” and identified the applicant to the hiring manager. The elected official further stated that the applicant had over twenty years of valuable experience. When the hiring manager stated that the applicant was somewhat overqualified, the elected official reiterated that the applicant had the type of experience preferred by the elected official. At the end of the conversation, the elected official advised the hiring manager to select whomever the hiring manager deemed best for the position and that the elected official “would not give [the hiring manager] a hard time about it” if the applicant was not selected.

The 1994 Consent Decree entered in the *Shakman* litigation expressly prohibits the County, including its elected officials, from influencing the hiring process for non-exempt positions by making political recommendations or otherwise communicating “a prospective employee’s sponsorship.” The preponderance of the evidence developed during the course of this PCL investigation establishes that the conduct of the subject elected official is proscribed by the Consent Decrees. That is, the elected official, in recommending a personal acquaintance to the hiring manager, introduced a political factor, namely a recommendation from a publicly elected official, into a hiring process regarding a non-exempt position. It makes no difference that the elected official gave assurances to the hiring manager that the hiring manager was free to make an independent decision on the candidacy of the applicant. It also is not relevant that the applicant was not hired. The hiring manager was unfairly put in the position of having to make a hiring decision while being fully aware that an elected official was specifically favoring an acquaintance for the position. It is this type of political pressure, however benign it may seem to some, that could quickly erode the progress the County has achieved in distancing itself from the era of political patronage hiring.

Based on these findings, our office recommended that the subject elected official participate in a training session with the Compliance Administrator, the Compliance Officer and/or the OIIG to ensure full awareness of the of the prohibitions reflected in the Consent Decrees, the *Supplement Relief Order*, the Human Resources Ordinance, and the Employment Plan. On September 23, 2015, the subject elected official responded to the OIIG report, expressed disagreement with the OIIG findings and requested reconsideration by the OIIG. The elected official did not believe that a violation of County ordinance or the *Shakman* Consent Decree occurred because the elected official did not use the word “recommend” when discussing the job applicant and told the hiring manager to pick whomever she deemed best for the position. On October 14, 2015, the OIIG replied to the elected official that a recommendation can be made without using the word “recommend” and that was the case in this instance. Specifically, the

elected official had made positive comments about the applicant to the hiring manager and stated that the applicant possessed the type of experience preferred by the elected official. Because such statements constitute a recommendation, the OIIG confirmed its disposition of this matter and requested that the elected official reconsider participating in the recommended training.

Outstanding OIIG Recommendations

In addition to the new cases being reported in this quarter, the OIIG has followed up on outstanding recommendations for which no adequate 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 or after the grant of a 30 day extension to respond. 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 be amended to 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 Minority and Women Owned Business enterprises (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.

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 in the prohibitions against conflicts of interest and the appearance of impropriety and should extend the mandatory written disclosure requirement of such conflicts or potential conflicts to BOR officials. These recommendations were made on March 24, 2015.

The BOR has responded stating that it declines to address the issues raised by the OIIG or adopt the OIIG recommendations based on its position that the OIIG does not have jurisdiction over it.

IIG13-0417. Although this investigation did not reveal evidence of procurement fraud as originally alleged by the complainant, it did reveal some invoicing errors for vehicle maintenance for the Sheriff's Office. Based on these results, the Sheriff's Office stated it will perform additional audits on vendor invoices and conduct random spot-checks on completed services. We recommended that the Sheriff's Office continue to conduct intermittent audits on vendor invoices and perform random checks on work performed.

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.

IIG14-0186. 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. As of the last quarterly report, CCHHS had requested an extension of time to respond to pending recommendations and indicated that amended policy was forthcoming. On September 28, 2015, CCHHS responded to the OIIG recommendations and outlined the creation of a comprehensive policy establishing procedures for the maintenance of patient valuables. Several OIIG recommendations were not addressed and will be followed-up in the coming weeks.

IIG14-0266. This was a joint review by the Office of the County Auditor, Compliance Officer and OIIG. The 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 (effective August 1, 2013). 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. The County has responded and indicated that it has implemented procedures consistent with certain of our recommendations and will adopt the remaining recommendations in the future. The County indicated that some of the issues raised in our report will be addressed through a new Time and Attendance System due to be implemented in 2016.

IIG14-0349. In this case, the OIIG recommended termination of employment and placement on the CCHHS Do Not Rehire List of a Storekeeper at Stroger Hospital who had allegedly stolen items belonging to CCHHS and had refused to cooperate with the OIIG during its investigation of his alleged misconduct. The subject had also recently been arrested for domestic battery. The OIIG also recommended that CCHHS amend its personnel rules to require its employees to report arrests as is required under the County's personnel rules. CCHHS responded by noting that the subject employee was no longer employed by CCHHS. CCHHS rejected our recommendation to place the subject employee on its Do Not Hire List because the subject was no longer employed and expressed concerns over due process violations. CCHHS stated that in the future it would consider amending its personnel rules as recommended by the OIIG, but as of this date it has not adopted the OIIG recommendation. On September 16, 2015, the OIIG requested that CCHHS reconsider its decision not to place the subject employee on its Do Not Hire List, noting that the CCHHS Employment Plan affords the subject employee with requisite due process protections.

IIG14-0380. As a result of an investigation into alleged improprieties involving a County procurement, 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 a procurement evaluation 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. Our recommendations were adopted by the County.

IIG14-0465. On February 2, 2015, 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 its respective Employment Plan so as to mutually honor the ineligibility lists of the other Cook County government entities. The Recorder of Deeds timely 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 timely 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. On July 27, 2015, HHS responded that it will place the subject applicant on its Do Not Hire List and will contact the County to determine what action HHS needs to take to make its Do Not Hire List policy consistent with any recent changes made by the County. The County has not yet responded to the OIIG recommendations.

IIG15-0053. In this case, disciplinary action was recommended for a CCHHS employee who recklessly overstated her hours of relevant work experience to ensure she met the minimum qualifications for a position for which she had applied. CCHHS adopted the OIIG recommendation for disciplinary action.

IIG14-0485. This investigation revealed 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 in violation of CCHHS Supply Chain Management Procurement Policy.

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 when they occur. CCHHS has indicated that it will work to eliminate any variations from its procurement policy and otherwise adopted the substance of our recommendations.

IIG14-0501. After finding the existence of recurring 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.

IIG15-0019. The OIIG opened this investigation after receiving information that a college student had been regularly attending autopsies at the Cook County Medical Examiner's Office ("ME") and classifying herself as a Cook County "Intern" on her social media pages. The ME does not have an intern program. The OIIG determined that the ME violated Section XI of the Cook County Employment Plan in that the ME utilized an intern without following the General Hiring process or reliance upon an established program administered by an academic institution. Although senior staff members stated their belief that the subject student was not an intern within the meaning of the Employment Plan *so long as they did not refer to her as such*, we believe the evidence establishes that the student was functioning as an intern. We are concerned that senior staff members recognized a potential Employment Plan violation yet sought to remedy the concern by simply avoiding the use of the term "intern" and referring to the student using a different title. While the senior staff of the ME have all received the appropriate Employment Plan training, on March 25, 2015, we recommended further training for executive and medical staff and further recommended that the ME train its employees on both the visitor policy and appropriate shadowing policy. The ME adopted the OIIG recommendations in full. The office added a new section in its standard operating procedures regarding shadowing, worked with the Bureau of Human Resources to post its internship positions online, and provided further training to its employees on the intern policy.

IIG15-0041. In this case, the OIIG recommended that a Seasonal Driver with the Department of Transportation and Highways (DTH) be terminated from Cook County employment and be placed on the County's Do Not Hire List for violating the County ordinance requiring cooperation during an OIIG investigation and for violating various County Personnel Rules, including those relating to insubordination and negligence. The Superintendent of DTH responded that the subject employee was no longer employed by DTH and that his name would be submitted to the Bureau of Human Resources to determine if he may be added to the County's Do Not Hire List.

IIG15-0041A. This investigation involved 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. To date, the County has not responded to our recommendation, which was originally made on May 15, 2015.

IIG15-0078. In this case, the OIIG recommended that a Clerk with the Cook County Department of Adoption and Child Custody Advocacy be terminated and placed on the Do Not Hire List for a period of 5 years for providing false information in certain employment applications with Cook County government. 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). Accordingly, we recommended that the Clerk 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.

The County stated that the subject employee resigned after disciplinary proceedings began and that her name has been referred to the Bureau of Human Resources for placement on the Do Not Hire List. HHS has likewise indicated that the subject employee will be placed on its Do Not Hire List and that HHS will contact the County regarding mutuality provisions for ineligibility lists.

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 July 1, 2015 to September 30, 2015, the Office of the Independent Inspector General received 19 Political Contact Logs.

Post-SRO Complaint Investigations

In the last quarter, the OIIG has received one additional Cook County *Shakman* Post-SRO Complaint. Five such Post-SRO 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

Apart from the above PCL and Post-SRO activity, the OIIG has opened 15 additional UPD inquiries during the last reporting period.

The OIIG continues to assist and work closely with the embedded compliance personnel in the FPD, CCHHS, the Cook County Bureau of Human Resources and the Cook County Recorder of Deeds, 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 further collaborated with Cook County as it works with the Compliance Administrator to make improvements in the administration of the list.

OIIG Employment Plan Oversight

Per 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 fourteen *Shakman* Exempt Cook County employees;
2. The Direct Appointment of seven CCHHS employees;
3. Fourteen actions under the Employment Plan Supplemental Policies.

Monitoring

The OIIG currently tracks all disciplinary activities in the FPD and offices under the President. In this last quarter, the OIIG tracked (and selectively monitored) 41 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.

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.

Honorable Toni Preckwinkle
and Members of the Board of Commissioners
October 15, 2015
Page | 13

Very truly yours,



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

cc: Ms. Tasha Green Cruzat, 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 Assistant 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