



# Illinois Chapter Association of Inspectors General

*Advancing Professionalism, Accountability & Integrity*

## Newsletter

Greetings Chapter Members,

### Message from Kathryn Richards Illinois AIG Chapter Board President

Inspector General for the Chicago Housing  
Authority

I hope you are enjoying this warm fall season. As we head into the end-of-year holiday season, I hope you take some time to acknowledge and celebrate the many accomplishments of the past year. Our member agencies have produced remarkable work, from investigations rooting out corruption and fraud to audits identifying areas for improvement in government, all with great impact. Much of this work is highlighted below. I and the rest of the Illinois Chapter Board look forward to creating even more opportunities in 2024 for our members to come together and share their work and insights.

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The AIG Illinois Chapter Board's remaining 2023 meeting will be held at 10 AM on December 6th.

Meetings are hybrid, with a virtual and in person option at the OEIG office at 69 W. Washington. The Board welcomes members' involvement and ideas.

If you are interested in attending, email us at [ilchapaig@gmail.com](mailto:ilchapaig@gmail.com).

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### CHA OIG Releases Third Quarterly Report

CHA's Office of the Inspector General completed its third Quarterly Report of 2023. Highlights this quarter include an OIG criminal investigation that resulted in a court order of \$73,000 in restitution to the CHA, summaries of administrative investigative findings, audits and much more.

[Read more here](#)

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### Audit of CHA's Implementation of Procurement Reform Task Force Recommendations Part II

The OIG's most recent audit found that the CHA's Department of Procurement and Contracts (DPC) had fully implemented the OIG's earlier recommendations regarding economic disclosure statements and partially implemented PRTF recommendations. The OIG made three additional recommendations to improve the contractor economic disclosure process, share more information regarding debarred vendors, and maintain uniform and complete contract files.

[Read more here](#)



### **Significant Activity Report: PPP Fraud Investigations**

On September 6, 2023, the Office of Inspector General for Chicago Public Schools (CPS OIG) reported on pandemic relief fraud investigations of 14 CPS employees. Most of these employees earned six-figure salaries and held positions of authority and trust throughout the district. In each case, the CPS OIG found that the employee used falsified loan applications to receive up to \$21,000 in fraudulent Paycheck Protection Program (PPP) loans.

The CPS OIG has been conducting thorough investigations into suspected PPP loan fraud by CPS employees since 2021. This Significant Activity Report updates the CPS OIG's FY 2022 Annual Report which mentioned the OIG's district-wide review of CPS employees who received PPP loans. Following a widely reported nationwide trend of fraudulent loans, the OIG's review has identified hundreds of potentially fraudulent PPP loans.

[Read more here](#)

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### **Illinois Tollway, Office of Inspector General Semi-Annual Summary Report**

The Illinois Tollway, Office of the Inspector General released its Semi-Annual Summary Activity Report on September 28, 2023. The report, as well as previous Semi-Annual Summary Activity Reports and Redacted Investigative Summary Reports, are available online (see "OIG Reports" section of webpage).

[Read more here](#)

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### **City of Chicago OIG Releases Third Quarter Report**

The third Quarter Report for 2023 showcases the rigor and impact of City of Chicago Office of Inspector General (OIG) work.

Among the work reported is the first publicly reported outcome of OIGs work investigating fraudulent Paycheck Protection Program loans by City actors. OIG's proactive data analysis has identified over 1,000 loans issued to individuals within OIG's jurisdiction.

OIG successfully pursued a finding of probable cause to believe that a manager at a restaurant bribed a City inspector; this is the second such finding against a member of the public as a result of an OIG investigation.

[Read more here](#)

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### **Understanding the City of Chicago Police Department's Budget 2023**

The Chicago Police Department (CPD) is the City of Chicago's largest department, and a large percentage of the City's overall budget goes to fund CPD and other policing-related costs. The budget for the CPD is a part of the City of Chicago's budget. To understand what resources are provided to CPD and how they are used, it is helpful to have a basic knowledge of the City's budget and budget process.

[Read more here](#)

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### **Recommendations to Inform and Improve Police Board Decisions**

The Public Safety section of the City of Chicago Office of Inspector General (OIG) conducts reviews of policies, procedures, and practices of the Chicago Police Board's disciplinary hearings and decisions to determine whether discipline is "consistently and fairly applied" and to make recommendations to inform and improve its work.

During its review of decisions made by the Police Board, OIG identified an inconsistency concerning the Police Board's Findings and Decisions in 21 PB 2994. At issue in that matter were allegations involving the use of a chokehold by a Chicago Police Department (CPD) member and the failure to report the chokehold by two CPD supervisors.

[Read more here](#)

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### **Follow-up to OIG's Second Audit of the Chicago Fire Department's Fire and Emergency Medical Response Times**

The City of Chicago Office of Inspector General (OIG) has completed a follow-up to its October 2021 second audit of the Chicago Fire Department's (CFD) response times to calls for emergency fire and medical services. Based on the Department's responses, OIG concludes that CFD has not implemented corrective actions related to the audit findings.

The purpose of the 2021 audit was to determine whether CFD had goals for fire and emergency medical services (EMS) response times consistent with state and national standards and whether CFD response times met those standards. OIG concluded that CFD had not implemented performance management strategies that would allow it to evaluate fire and EMS response times in alignment with best practices, nor had the Department remedied data issues identified by OIG in 2013.

[Read more here](#)

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### **Chicago Police Department 911 Response Time Data Collection and Reporting**

The Office of Inspector General (OIG) conducted an inquiry into the Chicago Police Department's (CPD) data collection and reporting of response times for 911 calls for emergency police service. The objectives of the inquiry were to determine the completeness rates of CPD response times recorded by CPD and the Office of Emergency Management and Communications, and to identify factors contributing to missing response time data for 911 calls for CPD service. OIG found that CPD's data collection of 911 response times to be incomplete; the Department fails to record timestamps for various statuses throughout the dispatch and police response for a substantial number of 911 calls.

[Read more here](#)

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### **Audit of Department of Family and Support Services Outreach to Encampments of People Experiencing Homelessness**

The City of Chicago Office of Inspector General (OIG) has released its audit of the Department of Family and Support Services (DFSS) outreach to encampments of people experiencing homelessness. OIG

found that DFSS has found success in rapidly housing encampment residents who wish to pursue permanent housing using a “housing first” approach via its Accelerated Moving Events (AME) program. Further, DFSS follows the City’s policy for cleaning encampment areas, including notifying encampment residents in advance and providing notice before disposing of potentially abandoned items; the City’s off-street cleaning policy strives for balance between the health and safety of the public way and the needs and rights of encampment residents.

[Read more here](#)

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### **Chicago Department of Transportation Commercial Driveway Billing Audit Third Follow-Up**

The City of Chicago Office of Inspector General (OIG) has completed a third follow-up to its July 2019 audit of the Chicago Department of Transportation’s billing process for commercial driveway permit annual fees. Based on the Department’s responses, OIG concludes that CDOT has partially implemented corrective actions related to the audit findings.

The purpose of the 2019 audit was to determine whether CDOT accurately and completely billed commercial property owners for driveways that use the public way. OIG found that CDOT either did not bill or inaccurately billed an estimated 6,713 permit holders, resulting in an annual revenue loss between \$1.1 and \$1.5 million. In addition, CDOT could not ensure that all relevant driveways were recorded in its driveway permit system. Finally, OIG found that the City did not actively pursue payment for past-due driveway permit fees.

[Read more here](#)

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### **OIG Enforcement of the Chicago Police Department’s Rule Against False Reports**

The Public Safety section of the City of Chicago Office of Inspector General (OIG) has conducted an inquiry into the enforcement of the Chicago Police Department’s (CPD) Rule 14, which prohibits CPD members from “[m]aking a false report, written or oral”. OIG found structural failures in Chicago’s police accountability system allow CPD members with Rule 14 histories to remain in positions with duties that depend upon their truthfulness and credibility. Gaps in current BIA and COPA policies and practices contribute to the underenforcement of Rule 14.

[Read more here](#)

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### **AIG Illinois Chapter Training Webinar Foundational Writing Skills for Audit and Investigative Reporting**

November 3, 2023 8:30 AM - 12:45 PM

Communication is paramount for government offices. Whether you are telling your story through an audit report or summarizing your findings in an investigative report, your written communications are critical. This intermediate writing training will cover three topics: Mastering Tone; Deductive v. Inductive Writing; and Sentence Structures that Confuse v. Enlighten.

[Register Here](#)

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### **AIG Florida Chapter Training Webinar**

November 13-14, 2023

Presented topics include cyber security strategy and legislative updates, effective prosecution techniques, case trends from local offices of inspector general, public records law, whistle-blower investigations, internal controls, and code of ethics.

[Register Here](#)

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**AIG Certified Inspector General Institute**

March 11-15, 2024 - Jacksonville, Florida

Applications open December 1, 2023

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**City of Chicago Office of Inspector General**

Investigator I  
Assistant Inspector General  
Senior Performance Analyst  
Associate General Counsel for Public Safety  
Forensic Data Analyst - Database Administrator  
Chief Assistant Inspector General - Legal Counsel  
Chief Assistant Inspector General - Legal Compliance

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**City Colleges of Chicago Office of Inspector General**

Investigator II - Auditor

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**Illinois Department of Healthcare and Family Services Office of Inspector General**

Quality Control Supervisor - Public Aid Quality Control Supervisor

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**Chicago Board of Education Office of Inspector General**

Investigation Assistant

## Illinois Secretary of State Office of the Inspector General

### Staff Attorney - Springfield

The Office of the Inspector General (OIG) for the Illinois Secretary of State is seeking to fill an attorney position at the office located in Springfield. Please send a cover letter, resume, and writing-sample to Inspector General Paul Thompson at [pthompson@ilsos.gov](mailto:pthompson@ilsos.gov). Additional questions regarding the positions can be answered by telephone at 217-801-3060. The attorney will serve as legal advisor concerning inquiries, reports and programs administered by OIG in hearings, special investigations, and research for the application of facts, law, and legal analysis. The attorney will be involved with the oversight of investigations/audits, issuance of administrative policies or determinations, drafting of complex legislation, regulations, and procedures as well as providing legal counsel to OIG staff and administrative officials on matters of policy, discipline, and organization; the attorney will further conduct or assist other OIG staff on cases that may have significant governance implications.

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### Leveraging Past Audits to Create a Global Advisory

**Justin Gutierrez**  
**Performance Analyst**  
**City of Chicago Office of Inspector General**

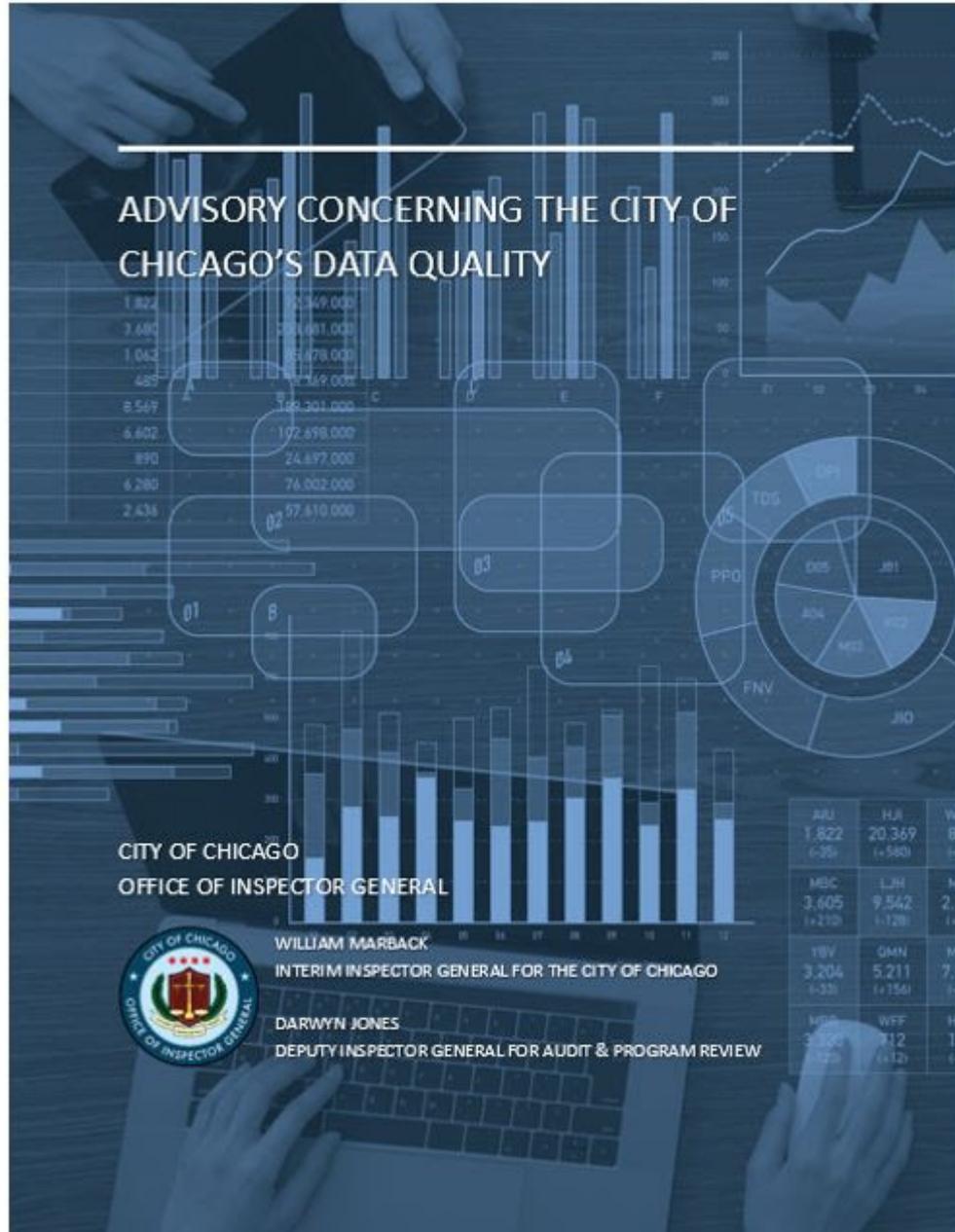
As auditors we may feel disheartened when we encounter the same problems in different settings. After all, recurring deficiencies may indicate a pattern too large to be addressed meaningfully by any single audit. Rather than lament these problems, auditors can see these patterns as opportunities to leverage their experiences to make a significant impact.

To address these types of patterns, the Audit and Program Review section (APR) of the City of Chicago Office of Inspector General decided to create a work product that could capture themes that transcend a single department—the “global advisory.” In our office, advisories are limited scope analyses with suggestions for City management’s consideration. Unlike the audits we conduct, advisories do not include testing procedures, findings, or formal recommendations. Rather, advisories are tools that efficiently communicate potential risks or share valuable information. The global advisory takes the advisory format further by illustrating systemic risk with examples of related deficiencies across multiple departments.

One theme we kept encountering in our work was data quality issues. When looking at data to assess an auditee’s performance, we frequently came across the same barrier: the data was unreliable and could not be used for testing. This barrier also meant that the auditees could not

use that same data to assess their own performance. Without quality data, neither we nor the auditee could determine if they were moving toward their goals or achieving desired outcomes.

To communicate this identified pattern of data quality issues, we leveraged our global advisory tool to catalogue evidence of these issues from OIG's past work and published [our data quality advisory](#). In addition to examples from APR's experience, we also gathered examples from other sections of our office (e.g. Investigations, Public Safety, Compliance, and the Center for Analytics and Information Technology (CITA)), resulting in a more persuasive cross-section product.



Source: City of Chicago Office of Inspector General

### I. A Framework for Data Quality

At the beginning of this project, we recognized the need for a framework to help define data quality, communicate its importance, and to organize our past work. Like audit criteria, this framework helped us define “what should be” for the reader. Fortunately, a federal interdisciplinary committee developed a framework defining data quality relative to information’s utility, objectivity, and integrity.<sup>[1]</sup> To help us organize OIG’s observed data quality issues into a coherent message, we used this framework to convey the impact these issues had on City operations.

According to the framework, data quality consists of three domains comprised of multiple dimensions.



Source: OIG Summary of federal best practices

Although this framework defines utility, objectivity, and integrity as distinct aspects of data quality, in practice they are often related. Frequently, deficiencies in one area of data collection and maintenance result in further issues elsewhere. With this framework in our toolkit, we set out to look at past examples of our work through this new lens. Below are several Chicago-specific examples of inconsistent data quality included in our global advisory.

- A [2019 APR audit](#) of the Chicago Low-Income Housing Trust Fund's housing quality inspections found the Trust Fund did not maintain complete documentation of known lead hazards, City Building Code violations, and local court action against subsidized properties. Formula and labeling mistakes in the spreadsheet used to manage the Fund's portfolio of subsidies led to shifting, duplication, and exclusion errors. As a result of the data's impaired objectivity and integrity, the Trust Fund could neither ensure that all subsidized properties were safe, nor determine the amount of funding it had allotted to subsidized properties.
- A [2021 notification](#) from OIG's Compliance and CITA sections to the Department of Human Resources identified data quality and management issues with employee records appearing in the Chicago Integrated Personnel and Payroll Systems. Employee leave records frequently lacked the basis for the leave or included a reason that was not authorized under Personnel Rules. The records also listed individuals on leave who were likely no longer active employees, including employees in departments that no longer existed. This data's lack of objectivity—particularly its inaccuracy and unreliability—made it difficult for the City to make well-informed personnel decisions, identify hiring inequities, and enforce leave restrictions per the City's Personnel Rules.
- A [2019 Public Safety review](#) of the Chicago Police Department's (CPD) gang database showed that the Department lacked controls for the generation, maintenance, and sharing of data that designated members of the public as gang members. CPD did not require users to provide evidence supporting a gang designation. It also did not require a formal review or approval of entries. Birth dates, gang affiliations, and reasons for gang designation within the data contradicted each other or were missing entirely. Issues with this data's utility, objectivity, and integrity undermine public trust in the police and can cause significant legal and social consequences for individuals and communities.
- A [2020 Investigations advisory](#) concerning the Department of Assets, Information and Services' (AIS) management of municipal license plates registered to City vehicles revealed that its inventory of municipal license plates did not match the Illinois Secretary of State's database. Approximately 7,000 municipal license plates issued by the Secretary of State were unaccounted for in the City's data. AIS did not regularly audit the City's inventory and did not validate its data. The inaccuracy and unreliability of the

data compromised its objectivity and increased the risk of abuse and misconduct with the City's fleet.

## II. Suggestions & Reception

In the spirit of encouraging a citywide approach to improving City data and its management, we included several suggestions in the advisory to help resolve the issues we've observed in our work. Given the global nature of these issues, we targeted our suggestions to someone with the perspective and position within the City to address them citywide, the City's Chief Technology Officer (CTO).

- First, we suggested that the CTO collaborate with departments to build a proactive culture of data quality management. Rather than reacting to data issues as they arise, departments should strive to get ahead of the challenges that may prevent them from defining and meeting their goals.
- Secondly, we similarly proposed that the CTO collaborate with departments to develop data quality plans that reflect the specific data needs of the department and its data users. In order to build that culture of proactive data quality management, departments should consistently identify what is working well with their data, what is not, and the possible solutions necessary to meet their needs.
- Lastly, we suggested that the CTO, when appropriate, help departments provide the information to the public about the quality of their data and its limitations.

The global advisory was well-received, and the CTO agreed with our observations and suggestions. Furthermore, the City Council Committee on Economic, Capital and Technology Development requested a public hearing in response to the report. Among other topics, this conversation concerned the City's next steps in strengthening its data quality management and centered on an IT Strategic Plan to address an array of related issues. The CTO asserted that goals documented in the Plan will help to address some of the root causes of the data quality issues detailed in our advisory.

As a result of this experience, APR developed an ongoing process for communicating data issues we observe in our audit work directly to the CTO. Now, when audit teams encounter data quality issues during an audit, they have the option to send a separate letter of notification to the CTO highlighting the issues they found. This letter is also shared with the department of concern to promote a collaborative effort between the parties.

It was gratifying to see the positive impact of tying together past work using the global advisory format. This approach allowed us to participate in a public hearing affirming the importance of data quality, engage different City stakeholders with the positions to affect change, and implement a new internal process to encourage improvements. Although patterns of deficiencies can feel discouraging to auditors it's important to remember that we can use them to bolster our message and impact. As you think about recurring issues in your own audit work, consider whether a global advisory could be a useful approach.

[1] Federal Committee on Statistical Methodology, "A Framework for Data Quality, FCSM 20-04," Federal Committee on Statistical Methodology, September 2020, accessed 12/22/2022, [https://nces.ed.gov/fcsm/pdf/FCSM.20.04\\_A\\_Framework\\_for\\_Data\\_Quality.pdf](https://nces.ed.gov/fcsm/pdf/FCSM.20.04_A_Framework_for_Data_Quality.pdf).

### About the author:

Justin Gutierrez joined the Office of Inspector General in 2019 and currently serves as a Performance Analyst for Audit & Program Review. Gutierrez previously worked for Chicago Public Schools as a Community Integration Specialist. In this role, he supported high school age students with disabilities through instruction and connection to the resources necessary for independent living. Gutierrez earned a BA in Sociology from North Central College in Naperville, IL, and an MA in Urban Planning from the University of Illinois Chicago.



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