CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

Audit and Program Review Section 2025 Annual Plan

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Draft

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Acronyms

APR	OIG Audit and Program Review Section
BACP	Business Affairs and Consumer Protection
CCCF	Chicago Community Catalyst Fund
CDOT	Chicago Department of Transportation
CFD	Chicago Fire Department
COLS	City-Owned Land System
CPD	Chicago Police Department
CSO	Combined Sewer Overflow
DFSS	Department of Family and Support Services
DOB	Department of Buildings
DOH	Department of Housing
DSS	Department of Streets and Sanitation
GAGAS	Government Auditing Standards
HRP	Home Repair Program
IEPA	Illinois Environmental Protection Agency
IGA	Mayor’s Office of Intergovernmental Affairs
IL OSHA	Illinois Department of Labor’s Division of Occupational Safety and Health
LSE	Life Safety Evaluation
MCC	Municipal Code of Chicago
OBM	Office of Budget and Management
OEMC	Office of Emergency Management and Communications
OIG	Office of Inspector General
OPSA	Office of Public Safety Administration

I | Mission

The City of Chicago Office of Inspector General (OIG) is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operation of City government.

The OIG Audit and Program Review (APR) section supports the OIG mission by conducting independent, objective analysis and evaluation of municipal programs and operations, issuing public reports, and making recommendations to strengthen and improve the delivery of public services.

APR conducts performance audits of Chicago municipal programs and operations in accordance with Generally Accepted Government Auditing Standards (GAGAS or "Yellow Book," 2018 revision) established by the United States Government Accountability Office. As defined in GAGAS 1.21,

> Performance audits provide objective analysis, findings, and conclusions to assist management and those charged with governance and oversight with, among other things, improving program performance and operations, reducing costs, facilitating decision making by parties responsible for overseeing or initiating corrective action, and contributing to public accountability.

In addition to performance audits, APR may also generate non-audit work such as advisories, explainers, notifications, and descriptions of programs.

APR's role is separate from, but complements, the work performed by the OIG Investigations and Public Safety sections. Investigations primarily examines allegations of individual misconduct or wrongdoing, and Public Safety focuses on the Police Department, Civilian Office of Police Accountability, and the Police Board, endeavoring to promote public safety, protect civil liberties and civil rights, and ensure the accountability of the police force. APR undertakes projects designed to help the City maximize the effectiveness and efficiency of programs and processes. APR is also distinct from the OIG Compliance Section, which performs legally mandated reviews of the City's hiring and employment practices to ensure compliance with the City's various hiring Plans.

II | Purpose of the Annual Plan

The purpose of the APR Annual Plan is to identify potential projects for the upcoming fiscal year. Projects are selected based on OIG's prioritization criteria, as described below.

A | Subject to Change

The Annual Plan is a guiding document that is subject to change; it does not prohibit APR from setting new priorities or initiating different projects over the course of the year. Circumstances that arise during the year may prompt OIG to undertake new, higher priority projects or reduce the priority of a planned project. Some topics on the Annual Plan may be deferred to following years. In addition, a project on the Annual Plan that originally begins as an audit may instead be completed as an OIG advisory, department notification, or other non-audit report, or terminated if OIG determines that further work will not bring substantial benefit to the City or will not be an effective use of OIG resources.

B | Departmental Action

OIG encourages City departments to proactively assess any program included in the Plan and to alert OIG to any corrective action taken in advance of and/or during an APR performance audit. Such action will not necessarily deter APR from auditing the program, but the audit will assess and report on any proactive and promptly reactive measures the department has taken.

C| Process

The Annual Plan is drafted in consultation with the Inspector General, senior OIG staff, and APR staff, with final approval by the Inspector General. OIG publishes a draft of the Annual Plan for public comment each year.

To indicate preferences on proposed projects and provide comment on this year's draft plan, please complete OIG's 2025 Annual Plan Community Feedback Survey, found at https://igchicago.org/2025draftplan, by January 31, 2025. With consideration of the feedback survey and public comments, OIG will then review, update, and publish the final Plan.

III | Selection of Topics for Inclusion in the Annual Plan

A | Topic Source

OIG gathers potential audit topics from a variety of sources, including intakes received from the public; suggestions from City officials, employees, and stakeholders; past OIG reports; OIG investigations; OIG staff knowledge; other governments' performance audits, audited financial statements, internal audits, and risk assessments; new City initiatives; program performance targets and results; public hearings and proceedings; and public source information, including media, professional, and academic reports and publications.

In spring of 2024, OIG launched a series of Listening Tours designed to gather community input on where OIG should focus its attention in 2025, so that those areas of focus best align with the concerns of Chicagoans. OIG reached across the City's neighborhoods, on busy commercial corridors, train platforms, at community events, and more, with an individual, "person-on-the-street" approach designed to put OIG in direct conversation with as many people as possible, to know what problems in City government most impact Chicagoan's daily lives. The potential project topics that were created, modified, or prioritized based on feedback from Listening Tours are identified within the 2025 New Projects section of this report.

OIG encourages the public to submit suggestions anytime through the OIG website: igchicago.org/intakeform/.

B | Prioritization Criteria

OIG considers several factors in selecting projects for the Annual Plan, including preliminary risk assessments of the programs or services involved in potential new project topics; the unique value a potential project might bring to City stakeholders; and the availability of APR resources, taking into account resources required to conduct follow-ups on past reports.

C | Risk Assessment

A risk factor is an observable and/or measurable indicator of conditions or events that could adversely affect an organization, absent effective internal controls. APR's assessment of topics is based on risk factors reflecting the nature and potential vulnerabilities of departments, programs, and vendors. APR considers a variety of risk factors, such as,

- Resources used to deliver service
    - Size (in dollars budgeted) of department/program
    - Number of staff working in department/program
- Public interest/impact
    - Critical to the City's mission or core service provision
    - Affects public health or safety
    - Affects vulnerable populations
    - Affects equitable provision and distribution of City services and support

- Number of residents, employees, and/or businesses affected/served
    - Quality/quantity of service provision
    - Customer satisfaction
- Compliance with laws, regulations, or policies
- Volume, type, and dollar amount of financial transactions
- Quality of internal control systems, including,
    - Existence of robust operational policies and procedures
    - Existence and use of performance metrics
- Underfunded mandate or mismatch between program objectives and available resources

APR assesses risk based on discussions with departments and leadership, information requested from departments, information obtained from prior OIG work, publicly available information, and additional research. In some cases, OIG selects a project because there is a preliminary indication of specific program vulnerabilities. In other cases, OIG selects a project where there is little or no indication of program vulnerabilities, but the public and governmental leadership would benefit from independent evaluation and assurance that the program is working well.

D | OIG Role and Value Added

OIG seeks to add unique value arising from its role as the City's independent oversight agency by prioritizing APR projects that,

- analyze performance of governmental operations and programs where analysis requires data and information not available to external entities;
- analyze governmental operations and programs where no recent independent analysis exists;
- develop knowledge of the operation of municipal programs and services; and/or
- analyze narrow, obscure, or complex aspects of municipal operations that receive little attention (in addition to broad scope topics).

In addition, OIG strives to ensure that the selection of projects provides coverage across the full spectrum of governmental functions and services.

E | Follow-Up on Past APR Reports

APR evaluates each completed audit six months after publication to determine whether, when, and how to conduct follow-up. Factors considered in determining what, if any, follow-up action to take include the nature of the original findings and recommendations, changes in management or staff structure, and external circumstances affecting the department. For example, APR may decide to postpone follow-up for an additional six months, conduct another full audit with complete re-testing, or simply request and evaluate documentation of corrective actions from management.

Follow-up reports are an essential part of the oversight process because they enable OIG to evaluate the actions taken by a department or agency to address problems identified in the original audit report. For that reason, they take the highest priority when planning the activities of APR personnel.

F | Available Staff Resources

The number, experience, and specific expertise of staff available to APR affect the selection of project topics and their scope. APR will not undertake projects unless OIG has the required competencies available among its personnel or can procure them from external sources. APR will request assistance from other OIG staff when their specialized expertise (e.g., legal or data analysis) may benefit a project, and will adhere to all GAGAS requirements for the use of such internal specialists.

To maximize their utility, performance audits must be timely. Unexpected delays caused by an auditee, such as slow responses to APR requests, or problems with the quality of program data, are noted as findings or limitations in published audit reports. Proper planning requires the Deputy Inspector General and Chief Performance Analysts to assign adequate staff—or, if necessary, reduce audit scope—to ensure timely completion of all projects.

IV | 2025 New Projects

As projects are completed and staff become available, APR reviews the topics on the Annual Plan and conducts additional research prior to launch. ("Launch" is the official opening of an audit with a department.) The final decision to launch a project requires approval by the Inspector General on a just-in-time basis, because circumstances affecting the decision of whether or when to launch a specific project are expected to change throughout the year.

APR groups the 23 potential project topics listed below into 5 broad categories corresponding with the functions and departments presented in the City's Annual Appropriation Ordinance, Summary E. The topics are not ranked. The numbers below are provided solely for ease of identification. Each topic listed includes,

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

There are 12 projects on the 2024 Plan that have not been launched and will not be carried over to the 2025 Plan. These projects are:

- Zoning Board of Appeals Explainer
- Chicago Animal Care and Control Operations
- Department of Buildings (DOB) Complex Demolitions
- Inclusionary Housing Task Force Report Implementation
- Chicago Public Library Social Services Staff Development
- Domestic Violence Help Line
- Earmarked Funds
- Outside Employment Policy
- Advisory on Citywide Implementation of Hansen and Information Public Sector Software
- Department of Technology and Innovation City Cybersecurity Incidence Response Plans
- Chicago Fire Department's (CFD) Overtime Management
- Office of Emergency Management and Communications' (OEMC) Workforce Management

A| City Development and Regulatory

1. Implementation of Department Commitments in the Sixty-Day Report on Executive Order 2019-2 (Reform to Aldermanic Prerogative)

Background and Rationale:

Executive Order 2019-2 required all City departments to identify and remove deference to aldermanic prerogative from their decision-making practices.[1] In a May 2019 Sixty-Day Progress Report, 30 departments detailed the steps taken to enact the mandate of the Order and any obstacles or impediments to prompt implementation.[2] In the five years since, aldermanic prerogative has remained a concern in Chicago. For instance, in October 2023, the United States Department of Housing and Urban Development communicated that the City's deference to aldermanic prerogative in zoning raises serious concerns about the city's compliance with federal civil rights law and perpetuates segregation.[3] This audit would determine whether City departments implemented and maintained the changes they committed to in the Sixty-Day Report.

This project was created to address public concerns about aldermanic prerogative and zoning communicated through OIG's 2024 Listening Tours and other channels.

Potential Objective:

- Have City departments implemented changes described in the Sixty-Day Report to cease deference to aldermanic prerogative where not required by law?

2. City-Owned Land Management (Appeared on 2024 Annual Plan)

Background and Rationale:

In recent years the Department of Planning and Development has developed an inventory of city-owned land for sale, known as the City-Owned Land System (COLS). COLS contains some additional records of land and facilities managed by other departments. However, the City does not maintain a comprehensive inventory of the land it owns and no department is tasked with maintaining this information. Without a full inventory, the City cannot ensure efficient enforcement of rules (such as illegal dumping, parking, and weed cutting) or that its land is used and valued appropriately. Community members cannot hold the City responsible for maintaining the land it owns if they cannot identify the City as the owner.

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[1] Executive Order No. 2019-2 Reform to Aldermanic Prerogative, https://www.chicago.gov/content/dam/city/depts/mayor/Press%20Room/Press%20Releases/2019/May/ExecutiveOrder.pdf. The Order remains in effect and has not been rescinded.

[2] City of Chicago, Sixty-Day Report on Implementation of Executive Order No. 2019-2, https://www.chicago.gov/content/dam/city/depts/mayor/Press%20Room/Press%20Releases/2019/August/MLEL_SixtyDay_Rprt_FINAL.pdf. No department reported obstacles or impediments.

[3] US Department of Housing and Urban Development, "Concerns Regarding CAFHA, et al. v. City of Chicago, Case No. 05-19-3886-6/9", https://news.wttw.com/sites/default/files/article/file-attachments/HUD%20Letter%2011.28.23.pdf

Potential Objectives:	• Has the City defined and implemented procedures to develop and maintain an accurate and comprehensive inventory of land assets? • How will the City ensure that the inventory is accessible to City departments that need it?

3. Business Affairs and Consumer Protection's (BACP) Tow Truck License Enforcement

Background and Rationale:	In 2021, City Council created Ch. 4-227 of the Municipal Code of Chicago (MCC) to address the "predatory and potentially dangerous business practices" of certain tow truck operators.[4] Council's action required tow truck companies operating in Chicago to obtain licenses to "better enable the City to take prompt and meaningful enforcement action against these dangerous business practices." Tow truck licenses are administered by BACP. This project would examine the effectiveness of BACP's regulatory process and whether it reduces Chicagoans' risk of being victimized by predatory towing practices.
Potential Objective:	• Does BACP take prompt, meaningful enforcement action against unlicensed towing companies?

4. Department of Housing's (DOH) Home Repair Program

Background and Rationale:	The Home Repair Program (HRP) provides grants for low-income homeowners to make improvements to their roof or porch. DOH contracts with delegate agencies, who then hire contractors to perform work. Poor construction of roofs and porches is a fundamental life and safety concern and can disproportionately impact low-income homeowners. This project would address recent concerns about the quality of work conducted by contractors, oversight and inspections by delegate agencies, and DOH's controls for ensuring only eligible contractors are allowed to participate in HRP.
Potential Objectives:	• Does DOH monitor roof and porch repairs to ensure work is done correctly? • Does DOH safeguard against abuse and fraud in the contractor selection, inspection, and payment processes?

B| Community Services

5. Department of Family and Support Services' (DFSS) Youth Employment Portfolio

Background and Rationale:	DFSS offers a variety of programs for youths aged 14-24 to work at 55 different delegate agencies through its youth employment portfolio. These programs are designed to build work readiness, financial literacy, and leadership skills. DFSS is

[4] Chicago City Council, Substitute Ordinance 2020-4817, https://occprodstoragev1.blob.core.usgovcloudapi.net/lsmatterattachmentspublic/7f7772cf-d832-4a0f-9cf3-df336ec8329e.pdf.

responsible for monitoring delegate agencies' programs and evaluating their performance through high-level outcome performance metrics. This audit would assess DFSS's responsibilities regarding the programs' performance management and, thus, the operations of the delegate agencies.

This project was created to address public concerns communicated during OIG's 2024 Listening Tours.

Potential Objectives:

- To determine the City's goals regarding service provision within the Youth Employment portfolio and specific programs.
- Does the City track performance toward its portfolio and program goals and make operational adjustments to improve performance?
- Does DFSS follow its Active Contract Management strategy and review its contracts with delegate agencies for performance outcomes and outputs?

6. DFSS City Services for Older Adults (Appeared on 2024 Annual Plan)

Background and Rationale:

In 2019, the City envisioned Chicago as an age-friendly city where "all residents have a full capacity to lead long and healthy lives."[5] Chicago's regional population is aging, with an estimated 2 million people likely to be above the age of 65 by 2050. DFSS's Senior Services division "provides adults ages 60 and older with access to services to remain healthy, safe, and independent" through in-home and caregiver services and social, educational, and recreational activities at 21 regional and satellite centers operated by delegate agencies. This audit would assess the operations of the Senior Services division and their provision of services to Chicago's older adults.

This project was modified to address public concerns communicated during OIG's 2024 Listening Tours.

Potential Objectives:

- To determine the City's goals regarding service provision to older adults.
- Does the City track performance toward its goals and make operational adjustments to improve performance?
- Does DFSS follow its Active Contract Management strategy and review its contracts with delegate agencies for performance outcomes and outputs?

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[5] Chicago Department of Public Health, "Healthy Chicago Databook: Older Adult Health," 2, accessed September 13, 2023, https://www.chicago.gov/content/dam/city/depts/cdph/statistics_and_reports/CCHE-001_OlderAdults_Databook_r5a.pdf.

7. DFSS Community Service Centers (Appeared on 2024 Annual Plan)

Background and Rationale:	DFSS operates six Community Service Centers across Chicago. These centers provide a whole-of-government approach to help vulnerable individuals and families access essential resources such as food, shelter, and clothing. Additional resources provided by the centers include, but are not limited to, domestic violence support, financial assistance programs, and job training and placement services for the formally incarcerated. Given the array of services offered, it is essential that Community Service Centers coordinate with other City departments and social service providers. Furthermore, because these centers are public-facing entities that connect residents to essential human services, it is critical to the people served, and to broad public confidence in City government, that DFSS is responsive to the communities it supports.
Potential Objectives:	• To describe how DFSS Community Service Centers coordinate with City departments, delegate agencies, and external stakeholders to support the needs of the communities they serve. • Has DFSS defined specific social service outcome goals of its Community Service Centers? • Does DFSS measure progress towards the outcome goals and determine whether the whole-of-government approach benefits the community at the level intended? • How does DFSS ensure intended program beneficiaries actually receive the services?

C| Finance and Administration

8. City Clerk Records Management

Background and Rationale:

The Chicago City Clerk's Office provides public access to proposed legislation, laws, records, and reports. The Clerk's Office is central for government transparency because it collects, records, files, stores, and provides access to the City's official records, legislation, and public meetings. According to its website, the Clerk's Office is the most visited office in Chicago government.[6] Timely and reliable management of physical and digital records affects all consumers of City government information, including policymakers, advocates, City employees and Council members, the press, and Chicagoans wishing to engage with local government.

This audit would assess whether the Clerk's records management practices comply with City ordinances, City Council rules, and the Illinois Local Records Act. Similar audits in other municipalities found opportunities for improvement regarding record retention policies, compliance with local law, and risk assessment regarding record storage.

This project was modified to address public concerns communicated during OIG's 2024 Listening Tours.

Potential Objectives:

- Do the City Clerk's records management operations ensure records are preserved and accessible to the public?
- Do the City Clerk's records management operations ensure compliance with the Municipal Code of Chicago, City Council rules, and State law?

9. City Council and Committee Meeting Attendance

Background and Rationale:

City Council and City Council Committees meet regularly in public. The City Council Rules of Order prescribe the ways that the bodies conduct their business. As part of those Rules, City Council and City Council Committees are required to establish and maintain a quorum, or minimum required number, of members to conduct business.

This project would examine whether members remain in attendance at meetings and whether they are present for the purposes of maintaining quorum before voting as required by the Rules of Order.

This project was modified to address public concerns communicated during OIG's 2024 Listening Tours.

[6] City of Chicago, "About the Office of the City Clerk," https://www.chicityclerk.com/about-office-city-clerk.

Potential Objectives:

- Do City Council and City Council Committees establish and maintain quorum during meetings?
- Do City Council Committees compile and submit attendance records to City Council?
- Do City Council Committees accurately report the results of voting on each recommendation to City Council?
- Do City Council and City Council Committees establish a physically present quorum prior to allowing for attendance by other means, and do members attend by other means for permissible reasons?

10. Mayor’s Office of Intergovernmental Affairs

Background and Rationale:

Employees of the Mayor’s Office of Intergovernmental Affairs (IGA) advocate for the mayor’s policy agenda at the local, State, and Federal levels. Little information about the day-to-day operations of IGA is publicly available, though reporting describes IGA’s role in directing certain aspects of City Council’s legislative activity.

This project would describe the function and authority of IGA, as well as its day-to-day activities on behalf of the mayor’s agenda.

Potential Objective:

- What are the function and authority of the Mayor’s Office of Intergovernmental Affairs?

11. Chicago Community Catalyst Fund

Background and Rationale:

The Chicago Community Catalyst Fund (CCCF) is an investment vehicle intended to increase access to capital for taxable, private projects in Chicago’s community areas. The MCC sets forth the CCCF’s mission to promote local economic development, pool public and private investment funds, and “generate returns commensurate with the City's overall investment portfolio returns.”[7]

CCCF’s Board of Directors oversees investment decisions of CCCF. This project would determine whether the Board of Directors, which includes the City Treasurer, the City’s Chief Financial Officer, and the Commissioner of the Department of Planning and Development, have fulfilled the requirements set forth in the MCC, including oversight of $21 million in CCCF funds issued as loans through the Small Business Resiliency Loan Fund Program.

[7] MCC 2-36-622(b)(iii)

Potential Objectives:

- Has CCCF increased the availability of investment capital in Chicago's community areas?
- Has CCCF served as a pooled investment vehicle to increase the amount of capital available for economic development?
- Have CCCF investments generated returns commensurate with the City's overall investment portfolio returns?
  Has the City Treasurer issued required annual reports to City Council on the performance of the CCCF?

12. Swiping Policy Enforcement (Appeared on 2024 Annual Plan)

Background and Rationale:

The City's swiping policy was recommended by an absenteeism task force which examined "the extent and causes of absenteeism among City employees." The policy was to address absenteeism and provide "needed public accountability." It explicitly requires that every City employee "swipe in and out each day," and that "single swiping is no longer permitted regardless of past practice, position, title, or function."[8] Exceptions to the rule require the approval of both the Department of Finance (DOF) and the Office of Budget and Management (OBM). The policy also defines approved swipe locations and prohibits employees from commuting to and from home "on the clock." OIG investigations have substantiated time fraud by City employees. This audit seeks to determine whether the City enforces the swiping policy, reducing the risk of employee time fraud.

Potential Objectives:

- Do DOF, OBM, and other City departments enforce the swiping policy?
- Has DOF and OBM approved, as exceptions to the policy, those employees who do not comply with the policy?
- Do departments monitor time and attendance reports to ensure employees swipe in and out at their assigned location?
- Since the swiping policy was instituted, have there been any changes implemented or considered?

[8] Employees are meant to record their work hours by swiping in and out each day. "Single swiping" refers to the act of swiping only once rather than in and out.

13. Mayoral Boards and Commissions (Appeared on 2024 Annual Plan)

Background and Rationale:

Chicago's municipal government includes over 100 boards and commissions with members appointed by the Mayor: for example, Special Service Area commissions, advisory groups such as the Board of Health, and regulatory bodies like the Zoning Board of Appeals and the Emergency Telephone System Fund Board.[9]

The composition and responsibilities of these groups are governed by various ordinances, laws, and executive orders, but detailed information about their budgets and operations is not always readily available. Limited transparency creates concerns around conflicts of interest, etc., given that appointees are City officials and may be subject to Ethics Ordinance restrictions and other rules.[10]

This project would provide transparency into the functions of mayoral boards and commissions, quantify their use of taxpayer dollars and City resources, and evaluate their compliance with relevant regulations.

This project remains prioritized to address public concerns communicated during OIG's 2024 Listening Tours.

Potential Objectives:

- What are the operating budgets and activities of mayoral boards and commissions?
- Are mayoral boards and commissions constituted according to the relevant requirements?
- Are appointed members of boards and commissions who are subject to the disclosure requirements of the City's Ethics Ordinance in compliance?

14. OBM's Salvage and Turnover in Hiring

Background and Rationale:

When OBM develops the department's personnel budgets, it calculates an estimated turnover amount. This turnover amount reflects the department's reduced personnel spending because of maintaining vacancies. OBM requires departments to hold vacancies open until it can "salvage" the amount of personnel money that will fulfill the turnover amount.

This project will explain the process of salvage and turnover and compare the process to other municipalities' budgeting practices. Further, it will explain the impacts on budget transparency and operations from this practice.

[9] City of Chicago, "Office of the Mayor – Boards and Commissions," accessed September 8, 2023, https://webapps1.chicago.gov/moboco/.

[10] City of Chicago, "The Ethics and Open Meetings Guide for Board and Commission Members," 2, August 2019, accessed September 8, 2023, https://webapps1.chicago.gov/moboco/resources/pdf/Ethics_Booklet.pdf.

Potential Objectives:
- What are "salvage" and "turnover" as used in the budget process?
- How do other municipalities account and plan for personnel vacancies?
- How does the use of "salvage" and "turnover" affect departments' operations?

D| Infrastructure

15. Department of Streets and Sanitation's (DSS) Blue Cart Recycling (Appeared on 2024 Annual Plan)

Background and Rationale:

DSS is responsible for the Blue Cart Recycling program, which entails collecting waste from residential properties with four units or less. The Blue Cart Recycling program services over 620,000 residential units and, in 2022, cost $26.5 million. In April 2021, the City contracted with a private waste hauler to collect residential recycling in four of Chicago's six recycling regions. DSS crews service the remaining regions. In 2021, the City published a Waste Strategy that recommended improvement to the Blue Cart Recycling program. This audit will evaluate whether DSS has implemented the recommended improvements and whether the fee for garbage collection covers DSS's costs to provide the service.

Potential Objectives:
- Has DSS implemented the improvements to the Blue Cart Recycling program, as recommended within the Waste Strategy?
- Does the fee for garbage collection cover DSS's costs to provide the service?
- Do Blue Cart Service Areas handled by the private hauler experience higher capture rates for recyclable material than zones handled by DSS crews?

16. Chicago Department of Transportation's (CDOT) Street Resurfacing and Maintenance (Appeared on the 2020, 2021, 2022, 2023, and 2024 Annual Plans)

Background and Rationale:

In a 2015 audit, OIG found that CDOT's pavement management program did not meet federal guidelines and lacked sufficient street condition data, relying instead on constituent complaints and visual inspections. The audit also found that the City could save $4.6 million annually by reallocating money from resurfacing to preventive maintenance. Poor street conditions continue to concern roadway users. Furthermore, poor road conditions create road hazards that risk the public's safety and can cause property damage, potentially financially harming vulnerable populations. This audit will re-examine the City's pavement management program to determine whether improvements have been made to increase the efficiency and effectiveness of the program.

Potential Objectives:
- Does CDOT manage streets in a cost-effective way that extends pavement life?
- Describe the process by which CDOT coordinates street resurfacing and repair activities with sister agencies and utility companies.

17. Department of Water Management's (DWM) Lead Service Line Replacement

Background and Rationale:

Chicago has approximately 400,000 lead water service lines, the highest number of any City in the nation.[11] Lead is a toxic metal and, according to the United States Environmental Protection Agency and the Centers for Disease Control and Prevention, there is no safe level of lead in a child's blood. A new Illinois State law requires Chicago to replace all lead service lines within 50 years after it submits a final replacement plan to the Illinois Environmental Protection Agency.[12] DWM has five lead service line replacement programs, but its plan for total removal of the remaining lines is dependent on funding and workforce. State law requires DWM to complete at least two percent of the total required lead service line replacements each year.

Potential Objectives:

- What is DWM's progress towards the replacement of all remaining lead service lines?
- How does DWM's plan to replace lead service lines align with the EPA's 50-year timeframe for complete removal?

18. DWM's Stormwater Management

Background and Rationale:

The City of Chicago uses Combined Sewer Overflows (CSO) to divert stormwater and sanitary sewage to local waterways during large storms. These CSOs can potentially flood streets and residents' homes after large rain events. Flooding after large rain events has been on the rise in Chicago. On March 26, 2024, the Illinois Environmental Protection Agency (IEPA) issued the final permit for the City's CSOs. The permit imposes limitations, and monitoring and reporting requirements for CSOs in Chicago. The terms of the permit are set to prioritize environmentally vulnerable communities. This audit will determine the progress DWM has made towards implementing the requirements of the IEPA guidelines.

Potential Objectives:

- Did the City update the 2014 Green Stormwater Infrastructure Strategy to include measurable goals and outcomes through incremental CSOs, prioritizing sensitive areas and environmental justice communities?
- Did the City conduct a study or plan to conduct a study to evaluate the effectiveness of existing monitoring program of City-owned CSO outfalls?
- Did the City implement mitigation measures at the City-owned outfalls identified as most active?
- Did the City develop a new operations and maintenance plan that includes required mechanisms and specific procedures?

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[11] Joshua Singer, "EPA, Chicago Leaders Discuss Lead in Drinking Water," United States Environmental Protection Agency, July 8, 2021, accessed October 2, 2024, EPA, Chicago Leaders Discuss Lead in Drinking Water | US EPA.

[12] 415 ILCS 5/17/.12(v)(5). This law requires the City to submit its final replacement plan by April 2027.

E| Public Safety

Note: OIG's Public Safety Section conducts inspections, evaluations, and reviews of City police and police accountability programs, operations, and policies.

19. Office of Public Safety Administration's (OPSA) Civilianization Outcomes (Appeared on 2024 Annual Plan)

Background and Rationale:	Civilianization is the process where administrative positions held by sworn or uniformed officers are converted into positions that are held by non-sworn or non-uniformed individuals. Civilianization presents opportunities for cost savings and increased operational efficiencies. Past OIG reports identified missed opportunities to civilianize positions in the police and fire departments. In 2019, the City realigned administrative functions of the Chicago Police Department (CPD), CFD, and the Office of Emergency Management and Communications (OEMC) under OPSA. This project will determine what progress OPSA has made toward achieving the goal of moving sworn officers and uniform fire personnel from administrative roles and to the field.
Potential Objective:	• Have CPD and CFD maximized opportunities for civilianizing positions?

20. CFD Member Wellness Support Strategies

Background and Rationale:	As part of the emergency response community, CFD members face a high-stress work environment. If their wellness needs go unaddressed, the health and safety of the individual, their fellow members, and the public is put at risk. CFD's primary program to address member wellness is its Employee Assistance Program (EAP). This audit would assess the design and performance of CFD's EAP and any other wellness support strategies it implements.
Potential Objectives:	• Is CFD's EAP designed and implemented appropriately? • Does CFD adequately prepare supervisors to identify members potentially in need of emotional or behavioral support?

21. CFD's Compliance with IL OSHA's Occupational Safety and Health Compliance Guide for Fire Departments (Appeared on 2024 Annual Plan)

Background and Rationale:	The Illinois Department of Labor's Division of Occupational Safety and Health (IL OSHA) enforces regulations designed to prevent injury and loss of life in fire department operations. IL OSHA investigated the 2021 death of a firefighter and inspected CFD operations related to the incident. It concluded that while CFD largely operated according to established procedures, "certain procedures were not followed." IL OSHA cited CFD with four violations, one of which was a repeat violation. It also made 15 recommendations to ensure compliance and reduce the risk of future injuries or deaths.

Potential Objectives:

- Has CFD incorporated corrective actions regarding IL OSHA's recommendations, including those related to "medical evaluation[s] to determine the employee's ability to use a respirator" and the standard that firefighters "enter together, stay together, [and] exit together" with no exceptions?
- Does CFD ensure operations adhere to IL OSHA's Occupational Safety and Health Compliance Guide for Fire Departments?[13]

22. Life Safety Ordinance Enforcement

Background and Rationale:

Following several deadly fires, a 2004 ordinance required hundreds of high-rise buildings built before 1975 to retrofit with automatic sprinkler systems *or* pass a Life Safety Evaluation (LSE). LSEs are scored tests conducted by architects or engineers to certify the adequacy of fire safety measures. Due to the expense of sprinkler retrofits, most pre-1975 high-rises opted for LSEs instead.

During a current audit, OIG determined that DOB and CFD do not maintain a required public list of pre-1975 high-rise buildings that have passed LSEs, making it difficult to judge how many have mitigated their fire safety risks. This project will determine whether DOB and CFD maintain required records of compliant buildings and ensure that covered high-rise buildings fulfill life safety requirements.

Potential Objectives:

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

23. CFD Personnel and Resource Deployment

Background and Rationale:

Due in part to improved fire safety technology, more robust building codes, and better trained firefighters, fire departments are responding to fewer fire emergencies now than they have historically. Instead, departments are responding to many more emergency medical service calls. Fully 80% of CFD's calls are now for emergency medical services, versus just 20% for fire suppression and rescue. CFD reports maintaining 97 engine companies and 61 truck companies compared to 80 ambulances in total.[14] This project would assess the alignment between need and allocations of equipment and personnel for CFD's emergency medical response and fire suppression functions.

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[13] Illinois Department of Labor Division of Occupational Safety and Health, "Occupational Safety and Health Compliance Guide for Fire Departments," accessed February 11, 2024, https://labor.illinois.gov/content/dam/soi/en/web/idol/laws-rules/safety/siteassets/pages/il-osha-factsheets-publications/il-osha-compliance-guide-for-fire-departments-v1637400275761453796.pdf

[14] Chicago Fire Department, "Operations," accessed September 30, 2024, https://www.chicago.gov/city/en/depts/cfd/provdrs/ops.html.

Potential Objectives:

- Does CFD maintain ambulances and emergency medical personnel in numbers appropriate to meet Chicago's need for emergency medical services?
- Does CFD maintain fire suppression equipment and personnel in numbers appropriate to meet Chicago's need for fire suppression?

V | Reports Published in 2024

APR published the following five reports in 2024.[15] All are available at igchicago.org.

A| City Development and Regulatory

1. Follow-up to OIG's Audit of the Department of Planning and Development's Administration of the Neighborhood Opportunity Fund Small Grants Program, published January 4, 2024

B| Community Services

2. Follow-up of OIG's Audit of the Department of Family and Supportive Services Strategic Contracting, published March 12, 2024

C| Finance and Administration

3. Advisory Concerning the City's Complaint-Based Approach to City Services, published March 6, 2024
4. Audit of the Department of Finance's Civilian Workers' Compensation Program Administration, published July 31, 2024

D| Infrastructure

5. Follow-up to the Audit of the Department of Buildings' Permit Inspections Process, published June 5, 2024

E| Public Safety

APR did not publish any public safety reports in 2024.

[15] Published reports are grouped into the same 5 broad categories described in section IV, 2025 New Projects.

VI | Projects in Progress

The following 14 projects are underway as of the date of this report.[16]

A| City Development and Regulatory

1. Audit of the Department of Technology and Innovation's Information Security Office

B| Community Services

2. Audit of CDPH's Mental Health Equity

C| Finance and Administration

3. Equity Impacts of Prompt Payments
4. Audit of City Council Office of Financial Analysis' Compliance with Municipal Code Reporting Requirements
5. Audit of the Department of Human Resources' Administration of the Civilian Employee Assistance Program
6. City Spending for New Arrivals
7. DOF's Management of Outstanding Debt

D| Infrastructure

8. Water Billing Accuracy
9. Review of the City's Progress Toward a Safe and Convenient Bikeway Network
10. Audit of DSS's Rat Abatement Processes
11. Audit of DSS's Administration of Auto Pounds

E| Public Safety

12. Audit of CFD's Annual Fire Prevention Bureau's Inspection Process
13. Audit of OEMC's 311 Service Request Performance
14. Analysis to Determine CFD's Recruitment, Hiring, and Promotions Outcomes

[16] Projects in progress are grouped into the same 5 broad categories described in section IV, 2024 New Projects.

The City of Chicago Office of Inspector General is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government.

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

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