

January 1, 2025

# Fiscal Year 2024 Annual Report

Chicago Board of Education Office of the Inspector General



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**January 1, 2025**

To the President and Members of the Chicago Board of Education, the Mayor of the City of Chicago, the Illinois General Assembly, Chicago Public Schools administration and employees, CPS families and residents of the City of Chicago,

On behalf of the Office of Inspector General for the Chicago Board of Education, I am sharing the enclosed Annual Report pursuant to the Illinois School Code, 105 ILCS 5/34-13.1(e). This report provides a summary of the investigations and other matters our office reported to the Board of Education in Fiscal Year 2024, which concluded on June 30, 2024.

I am honored to have been appointed as the Interim Inspector General by Mayor Johnson in August upon the resignation of Inspector General Will Fletcher, with whom I had the privilege of working for four years as the Deputy Inspector General for the Sexual Allegations Unit. Each investigation and review summarized in this report was conducted under Inspector General Fletcher's leadership and reflects his commitment to independence and fairness while pursuing and promoting efficiency, accountability, and student safety across the District.

Each of the OIG's three units - General Investigations, Sexual Allegations, and Performance Analysis - reported significant findings of misconduct in Fiscal Year 2024. The wide variety of allegations addressed in this Annual Report not only demonstrates the skill and expertise of the OIG team, but also the expansive impact and improvements their work has across the District. These investigations led to significant corrective measures and disciplinary action taken by the Board of Education as a result of the OIG's findings and recommendations, as noted in this report.

Please feel free to contact us with questions about the report or any other concerns about fraud, theft, abuse, and waste occurring within Chicago Public Schools.

Sincerely yours,

*Amber Nesbitt*

Chicago Board of Education Office of the Inspector General  
567 W. Lake Street, Suite 1120, Chicago, IL 60661  
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## A. Mission



The OIG was created in 1996 by Illinois General Assembly statute 105 ILCS 5/34-13.1 (the Illinois School Code) and its authority is further established in Board Rule 3-8.

In Fiscal Year 2024, the OIG's budget was \$7.49 million.

## B. Staff Training and Investigation Standards

Many OIG employees are members of the Association of Inspectors General. The AIG annually offers government oversight training and certification courses for investigators, auditors, and managers. Many OIG employees hold the designation of Certified Inspector General, Certified Inspector General Investigator, or Certified Inspector General Inspector/Evaluator.

In addition, OIG employees across all three units participate in a variety of training programs throughout the year, including on a variety of investigative tools and skills, leadership, trauma-informed interviews and investigations, child development and interview best practices, and Title IX procedures and compliance.

The OIG conducts its investigations in accordance with generally accepted principles, quality standards, and best practices applicable to federal, state, and local offices of inspectors general. In addition, the OIG exercises due professional care and independent, impartial judgment in conducting its investigations and issuing its reports and recommendations. The threshold for substantiated findings is based on a preponderance of the evidence standard.

## C. Complaints Received in Fiscal Year 2024 and Opened Investigations

In Fiscal Year 2024, the OIG received 1,487 complaints of misconduct, waste, fraud, financial mismanagement, and adult-on-student sexual misconduct.



Of the 1,487 total complaints received, the OIG opened investigations into a total of 544 cases (36.6%). Several factors restrict the number of cases the OIG can open and investigate, including a continuing focus on significant and complex issues in pending investigations and time consumed by post-investigation activities (e.g., preparation and testimony for hearings, trials, and labor arbitrations).

Every year, the OIG receives more credible allegations than it has the resources to investigate, so the investigations that are opened are the result of an assessment of the severity of the allegations and the potential impact or deterrent effect of investigating certain subject matter.

The OIG received 228 anonymous complaints, 15.3 percent of the total complaints received during the reporting year. Although the OIG assesses allegations received by anonymous complaints as it would any other complaint, investigating allegations based on anonymous complaints is more complicated.

The table below reflects the various allegation types contained in the 1,487 complaints received by the OIG in Fiscal Year 2024.

#### Type of Complaint Received Fiscal Year 2024

Complaint Type	Quantity	Percentage
Sexual Allegations (Total)	469	24.66%
Touching - Less than Sexual Abuse	73	3.84%
Concerning: Undue Attention/Overly Familiar Behavior	64	3.37%
Concerning: Making Student(s) Uncomfortable/Other	51	2.68%
Sexual Abuse	51	2.68%
Concerning: Boundary-Crossing Comment(s)	39	2.05%
Concerning: Electronic Communication	35	1.84%
Grooming	34	1.79%
Sexual Act	24	1.26%
Sexual Comment - In Person	22	1.16%
Concerning: Staring/Leering	19	1.00%
Concerning: Viewing/Sharing Sexual Media	16	0.84%
Concerning: Unauthorized Transporting Student(s)	11	0.58%
Sexual Electronic Communication	10	0.53%
Concerning: Individual Gift Giving	9	0.47%
Outcry About Past Conduct	8	0.42%



### Type of Complaint Received Fiscal Year 2024

Complaint Type	Quantity	Percentage
Failure to Report	2	0.10%
Student-on-Staff Inappropriate Conduct	1	0.05%
Residency	121	6.37%
Discourteous Treatment	117	6.15%
Violation of Board Policy	113	5.94%
Mismanagement	75	3.95%
Residency and Tuition Fraud	73	3.84%
Falsification of Records	70	3.68%
Inattention to Duty	69	3.63%
Conduct Unbecoming	65	3.42%
Falsification of Time Records	65	3.42%
Off-Duty Criminal Conduct	52	2.74%
School Safety/Security	51	2.68%
Ethics	48	2.52%
Negligent Supervision of Students	43	2.26%
Tuition Fraud	43	2.26%
Discrimination	38	2.00%
Retaliation	38	2.00%
Preferential Treatment	37	1.95%
Fiscal Mismanagement	33	1.74%
Failure to Follow IEP/504 Policies/Procedures	25	1.32%
Misappropriation of Funds	24	1.26%
LSC Misconduct	23	1.21%
Corporal Punishment	22	1.16%
Bullying/Inadequate Response to Bullying	21	1.10%
On-Duty Criminal Conduct	19	1.00%
Improper Licensure	14	0.74%
Fraudulent Leave of Absence	8	0.42%



### Type of Complaint Received Fiscal Year 2024

Complaint Type	Quantity	Percentage
Unauthorized Use of Board Property	8	0.42%
Criminal Background	6	0.32%
Grade Changing	6	0.32%
Theft of Board Property	6	0.32%
Contractor Violations	5	0.26%
Unfit for Duty	4	0.21%
Using Verbally Abusive/Aggressive Language	4	0.21%
Wrongful Termination	4	0.21%
Violation of Magnet and Selective-Enrollment Policy	3	0.16%
Violation of Acceptable Use Policy	2	0.10%
Other	77	4.05%
<b>Total</b>	<b>1,901</b>	<b>100.00%</b>



# General Investigations Unit

The GIU is charged with the responsibility of investigating allegations of waste, fraud, and financial mismanagement.





## A. Basketball Coaches Recruited and Fraudulently Enrolled Varsity Players

An OIG investigation (21-01172) revealed that for the past four school years (school years 2020-21 through 2023-24), the head coach (“Coach A”) of a CPS high school varsity boys’ basketball team conspired with members of his coaching staff to help fraudulently enroll at least 17 students to play basketball at the school. In the past three<sup>1</sup> seasons, *at least half* of the school’s varsity players were fraudulently enrolled. Under Illinois High School Association (“IHSA”) rules, none of these students should have been eligible to play basketball at the school.

Beyond fraudulent enrollment, the coaches further violated IHSA and CPS rules by recruiting players to the school and by ignoring the IHSA’s “independent team” rule, which strictly limits how many players can play for both a coach’s high school team and their private non-school team at the same time.

Coach A’s scheme deprived legitimately enrolled student athletes at the school of spots on the varsity roster and denied other high schools, both within and outside of CPS, of fair athletic competition. What’s more, because many of the players in this investigation actually lived in the suburbs, their fraudulent enrollment also robbed Chicago students of seats and resources at the school.

### Coach A and His Staff Conspired to Fraudulently Enroll Players at the School

The OIG initiated this investigation after receiving a detailed complaint from the school’s community alleging that several players on its varsity basketball team lived outside of

Coach A and his coaching staff...helped families create false “proof-of-residency” documents including fake leases and utility bills

Chicago or outside of its attendance area. The OIG subsequently received additional complaints about recruiting and enrollment issues at the school as well as a recruiting complaint from another CPS high school.

The OIG’s investigation uncovered Coach A’s and his coaching staff’s enrollment scheme, which involved providing the students and their families with false addresses within the school’s attendance area. As part of that, Coach A and his coaching staff also provided or helped families create false “proof-of-residency” documents, including fake leases and utility bills, that the students’ families submitted to the school during enrollment.

In some instances, parents admitted to the OIG that they provided the school with a false address or fake “proof-of-residency” documents. One parent admitted that she and her family live in suburban Lynwood and that she provided the

<sup>1</sup> The 2021-22, 2022-23, and 2023-24 basketball seasons.

school with a fake Chicago address. The parent said that she obtained the address from the school's previous varsity basketball coach. Significantly, the former coach has also coached for Coach A's non-CPS AAU basketball organization (the "Club Team"). According to the parent, the former coach told her that her son would be admitted to the school through its "basketball program."

Another parent whose family lives in Richton Park, Illinois, admitted that he created a fake residential lease for an apartment in the school's attendance area as well as fake proof-of-residency documents from bills that had been mailed to his suburban home.

In other instances, the OIG spoke to the *actual* residents of the fraudulent addresses the players' families used for enrollment and learned that they had never rented out their properties. The homeowners told OIG investigators they didn't know the players who purportedly lived at their address and didn't recognize the leases for their properties the OIG found in the players' student files at the school.

The OIG also obtained ComEd customer account records which showed that the electric bills some players' families submitted to the school during enrollment as proof of their residency had been doctored to list fake account holder names or addresses.

Finally, the OIG found that some of the fake addresses were used for enrollment by multiple players at the school, including in the very same school years.

The school's fraudulently enrolled players came from all over. Many lived in the suburbs, while others lived in Chicago but outside of the school's attendance area. Some transferred from other CPS high schools while others transferred from area private schools. The common thread connecting nearly all players, though, was their participation in the Club Team.

nearly all the fraudulently enrolled players played for the Club Team *before* they started at the school

Numerous social media posts, as well as AAU season rosters, game statistics, and game videos, showed that nearly all the fraudulently enrolled players played for the Club Team *before* they started at the school and continued doing so after they were enrolled. Moreover, Coach A and nearly all of his school coaches also coached for the Club Team.

Many of the false addresses and fake enrollment documentation used by players' families were directly connected to Coach A or his coaches. Two addresses, for example, were connected to Coach B, a coach for both the school and the Club Team. The owner of the first of those addresses, used by two players for enrollment, told the OIG that Coach B asked if he could use the address to get a player enrolled at the school. That player's enrollment file showed that his father provided the school with a doctored ComEd bill that replaced the actual owner's name with his own.

Similarly, the second address connected to Coach B, used by three other varsity players, belonged to Coach B's relative. Coach B's relative told the OIG that she never rented her property to any of the players who reported it to the school.

The OIG repeatedly requested that Coach B sit for an interview, but he refused to speak with investigators.

Another varsity player provided the school with a fake ComEd bill during enrollment that listed an account number that actually belonged to Coach A's ComEd account for his own home address outside of the school's attendance area. When investigators told Coach A about this during his OIG interview, he said, cryptically, that the "numbers" on the player's bill "may have been compromised," but he could not explain further.

Even worse, two other varsity players reported living at an address near the school that Coach A himself supposedly rented four or five years ago. Not only did the players never live there, but Coach A himself also used the address—in the same school year as one of the players—to fraudulently enroll his own relative (who does not play basketball) at the school.

### **Fraudulently Enrolled Players Recruited to Play at the School**

Because of their access to the Club Team's roster, including some of the best boys' basketball players in the state, Coach A and his staff were able to successfully recruit players to enroll and play at the school, and openly touted their efforts across social media. However, both IHSA and CPS athletics rules prohibit recruiting student athletes.

Social media posts obtained during this investigation showed some players announcing that they had "committed" to attend the school months before they enrolled, while accounts belonging to the Club Team, Coach A, and other coaches either reposted the player's announcements or posted their own welcome messages.

One player at the school ("Player A") posted to Instagram almost eight months before he enrolled to announce that he would be playing for the school and thanked the coaches that "wanted" him. That same day, the Club Team's social media accounts posted the very same image of Player A, and Coach A shared it as well. Additionally, Coach B's Instagram account posted the same image of Player A with a caption welcoming the student with a hashtag of the school's name.

The OIG obtained similar social media posts for other players published by the players themselves, the Club Team, and coaches.

IHSA rules require students to be enrolled at a school before they can play sports for the school and restrict teams from practicing before the start of their IHSA season. But Player A, who announced prematurely that he would be at the school, started playing with the varsity basketball team both before he was enrolled (in a summer tournament) and immediately after, taking part in an improper pre-season practice. Player A's participation in each event



came well before the start of the basketball season and demonstrated that the player's spot on the team was already secured prior to his enrollment at the school.

Another recruited player ("Player B") seemingly short-circuited the school's enrollment process. Player B came to the school with his mother to speak to a school administrator (Administrator) about a possible transfer, received a building tour from Coach A, and was admitted *that very same day*. Significantly, Player B had begun playing for the Club Team before transferring to the school, and according to the Administrator, Coach A told her that he was good at basketball.

### **Coach A and His Assistants Also Violated IHSA's Independent Team Rule**

Beyond enrollment fraud and recruiting, the connection between Coach A's school team and the Club Team also violated the IHSA's "independent team" rule, which limits to two the number of players who can play for both a coach's school team and non-school team at the same time.

As previously discussed, almost all the fraudulently enrolled players at issue in this investigation played for the Club Team before they came to Coach A's school, and they continued to do so throughout their time at the school. In many instances, players' families attempted to conceal this connection on their children's school transfer paperwork, which required disclosure of players' non-school teams as well as any connection between a player's school and non-school coaches.

more than half of Coach A's school team also played for his Club Team, plainly violating the IHSA rule

In contrast, another player's mother *did* list the Club Team as her son's club affiliation and Coach A as his club coach, but the school Administrator still signed off on the form, enrolled the student, and allowed him to play basketball. The Administrator also did not report the issue to the IHSA, even though she was at the time an IHSA board member responsible for knowing and applying its rules.

During the four seasons at issue in this investigation, the overlap between Coach A's school team and Club Team ranged from four players to ten players. In three of those seasons, more than half of Coach A's school team also played for his Club Team, plainly violating the IHSA rule. Given that nearly all the fraudulently enrolled players played for the Club Team before coming to the school, proper enforcement of IHSA's independent team restriction could have potentially prevented the enrollment and recruiting violations revealed in this investigation.

## Coach A Repeatedly Lied to OIG Investigators

When the OIG interviewed Coach A about this fraudulent enrollment scheme as well as about his own relative's fraudulent enrollment, he repeatedly lied and gave evasive, inconsistent, and incredible answers. He claimed, for example, that he only became acquainted with some of his varsity players once they were at the school, even though social media posts and other evidence showed they had played for the Club Team *well before* enrolling at the school.

Coach A also denied that he was the Club Team's CEO or otherwise ran the organization, even though nearly every other person the OIG spoke to identified him as such and Coach A's own resume listed him as CEO. Coach A also told several lies about Player B, the player who met with the school Administrator the day he enrolled, including about when he first met the student and whether he talked to the student and his mother before his enrollment at the school.

Coach A also refused to accept blame for any of his fraudulently enrolled players, even though some of them used addresses or utility bills directly connected to him for their enrollment. Moreover, Coach A also placed blame for his relative's fraudulent enrollment on his relative's cousin, who Coach A claimed was responsible for the enrollment and suggested that the same person created the fake proof-of-residency documents in his relative's student file.

## Coach A's Scheme Was Enabled by Failures in Oversight at the School and the CPS Office of Sports Administration

The conduct of Coach A and his coaches blatantly violated myriad CPS and IHSA rules, and it should have been caught by the CPS Office of Sports Administration and the school's administration. Together, OSA and high school administrators are supposed to serve as dual layers of oversight for CPS high school sports. Instead, the OIG's investigation revealed that neither the school nor OSA provided any meaningful oversight at all.

### 1. ***School Failed to Enforce Its Enrollment Procedures Despite Signs of Enrollment Fraud***

During the OIG's interviews with the school's staff, investigators were repeatedly told that the school employs more stringent enrollment standards than at other CPS schools. This included asking for more proof-of-residency documents than what CPS policy requires, calling landlords and utility companies to verify the legitimacy of those documents, and most significantly, conducting home visits for all students admitted via neighborhood enrollment. The school adopted these measures, the OIG was told, due to its history of fraudulent enrollment problems.

Those same interviews as well as a review of student enrollment files, however, revealed that the school followed almost none of its supposedly augmented procedures where varsity



basketball players were concerned. Player file after player file revealed missing and inadequate documentation to establish the player's residency in the school's attendance area.<sup>2</sup> Some players' files, for example, did not include the two utility bills supposedly required for neighborhood enrollees, while other files didn't include any proof-of-residency documents at all. Another student's file included several proof-of-residency documents which were fake and, tellingly, dated *after* the student's enrollment date. Still another student's file included only documents listing a suburban address.

The files also did not include evidence that home visits were completed for any of the basketball players. School staff told investigators that home visits are documented on slips or forms that are placed in student files. The OIG, however, did not find such paperwork in the student files for any varsity players. This paperwork was missing even for students whose visits were supposedly completed by the Administrator.

During their OIG interviews, school staff reviewed the players' student files and repeatedly pointed out potentially false documents and other inconsistencies. One staff member involved in enrollment told investigators she would have halted the enrollment of many of the students due to issues with their enrollment documentation. The employee, however, also told the OIG that she did not review any of the varsity players' documents at the time they were enrolled despite the fact that she normally reviews every enrollee's documents for potential residency fraud. In fact, she said she didn't think she had ever seen a basketball player's enrollment materials. The interviews thus demonstrated that while the school had controls in place for catching Coach A's enrollment fraud scheme, it failed to utilize them.

Although the Administrator told the OIG that she tried to stay out of enrollment and athletic matters, the investigation established that she was highly involved in the enrollment of many of the students at issue in this investigation. The Administrator told investigators, for example, she completed visits for two players, including two or three visits for Player B.

Additionally, Coach A emailed the Administrator directly and attached academic documents he received from the parent (via Coach B) for the player whose parent admitted to living in Lynwood and using a fake address during enrollment.

Player file after player file revealed missing and inadequate documentation to establish residency

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<sup>2</sup> Most of the players at issue in this investigation enrolled at the school via neighborhood enrollment and/or were ultimately found to live outside of Chicago. Although a few transferred to the school via its magnet program, school administrators told the OIG that they would have still been required to reside within the school's attendance area to play sports. Moreover, CPS policy plainly prohibits listing false information—including false addresses—on enrollment documents for magnet and selective enrollment schools.

Moreover, emails also showed that, after the mother of one of the players inquired about a school parking pass for the player, a school staff member sent the Administrator a photo of the student's driver's license which listed a suburban address.

The Administrator also received complaints from parents and students about the school's basketball team under Coach A as well as emails about players that raised clear suspicions about their residency. These included allegations that Coach A's roster at the school consisted of his AAU players and that one of them lived in the suburbs.

Finally, the Administrator made incomplete and inconsistent statements to the OIG about her involvement in the enrollment of basketball players and, more specifically, her role in completing certain transfer paperwork for student athletes.

Notably, the Administrator was a member of the IHSA Board of Directors as well as OSA's advisory council. Therefore, she was (or should have been) more aware than most about fraudulent student-athlete enrollment. The evidence showed that the Administrator had ample reason to be suspicious about the fraudulent enrollment of basketball players at the school yet failed to take action or report it to OSA or IHSA.

In fact, when IHSA notified the Administrator in September 2023 of a complaint about several players at her school, including those at issue in the OIG's investigation, she strongly defended both the students and Coach A and accused the IHSA complainant of being a "disgruntled current parent" trying to get Coach A removed from the school.

The Administrator's response, however, was less than forthcoming about her awareness of potential enrollment issues with the school's basketball team. Her email response to the IHSA came just weeks after she spoke to the OIG and was specifically shown the fake and doctored enrollment documents for the players named in the complainant's allegations. Moreover, she had also received multiple complaints about Coach A and the basketball team from the school's community since Coach A started at the school.

The Administrator's ardent defense of her players and Coach A echoed an earlier email she sent to an administrator of another CPS high school in late 2021 after he alleged one of his own students had been recruited to enroll at her school.

When the OIG spoke to the Administrator, however, she complained about Coach A as well as the supposedly high level of enrollment fraud at her school, and seemingly distanced herself from the school's sports program. Like other school staff, the Administrator also noted issues with some of the player enrollment documents the OIG showed her during her interview.

The Administrator reacted in different ways when confronted with issues regarding her school's basketball team depending on her audience. To the IHSA and complainants, she was a zealous defender of her student athletes, but to the OIG she was a detached administrator seemingly struggling with enrollment issues.



## 2. OSA Unable and Unwilling to Fulfill Its Oversight Responsibilities

Even if the administration turned a blind eye to Coach A's fraud, OSA should have served as a second layer of oversight. The investigation, however, revealed that OSA was unable and unwilling to fulfill its oversight responsibilities for CPS sports.

Interviews with senior OSA staff revealed that it lacked even basic components of an athletics oversight system, including tracking systems for complaints, coach and student-athlete penalties, and (since the start of the pandemic) student-athlete transfers. This is despite the fact that under IHSA rules, OSA must serve as the local oversight and enforcement body for CPS sports and is also specifically responsible for making eligibility determinations for student-athlete transfers between CPS schools.

The OIG also observed that despite the investigative duties outlined for OSA in CPS' Athletics Constitution & By-Laws, some staff appeared to fundamentally misunderstand the nature and scope of its oversight authority.

OSA staff, for example, told the OIG that OSA can only conduct investigations if it receives a complaint, even though CPS policy specifically authorizes OSA to *proactively* investigate potential rule violations. Moreover, OSA staff told investigators that even if a student-athlete transfer looks suspicious, there is nothing OSA can do if the student's transfer paperwork says they moved residences or if the principals at the student's old and new schools both agreed with the transfer. OSA, however, is supposed to review and rule on the propriety of student-athlete transfers between CPS schools and IHSA rules state that the principals' concurrence with the transfer is not determinative of eligibility.

Finally, OSA staff demonstrated an indifference to investigating certain other types of sports misconduct. OSA staff, for example, told the OIG that it does not investigate potential violations of IHSA rule that limit overlap between school teams and AAU teams like the Club Team in this case. Similarly, OSA staff said that little is done to investigate student-athlete recruiting, and one high-level OSA staffer admitted that he was not even aware that CPS' Athletics Constitution & By-Laws explicitly prohibits recruiting.

During their OIG interviews, OSA staff repeatedly told investigators that they need additional staff to fulfill OSA's oversight responsibilities, especially as they relate to checking and verifying student residency and transfers. This may very well be true, particularly for schools like the one at issue in this investigation who have failed to report or stop systematic enrollment fraud. But OSA's lack of resources doesn't fully explain its years of lax athletics oversight.

“One high-level OSA staffer admitted that he was not even aware that CPS' Athletics Constitution & By-Laws explicitly prohibits recruiting.”



## The OIG's Recommendations

The misconduct revealed in this investigation demonstrated that CPS must fundamentally reform how it oversees and regulates high school sports. To that end, the OIG recommended that CPS create a new position reporting directly to the Chicago Board of Education who is responsible for managing and enforcing compliance with CPS and IHSA rules across CPS schools. The athletics oversight officer should serve as a liaison with IHSA and should take over responsibility for reviewing and ruling on player eligibility for student-athletes transferring between CPS schools. The officer should be empowered to proactively investigate potential athletics misconduct within CPS as well as complaints received from schools, players, and community members. The officer should be provided with the necessary resources to timely and efficiently complete their oversight responsibilities.

In response to this recommendation, CPS has informed the OIG that the Executive Director of OSA will be required to monitor compliance with CPS and IHSA rules across CPS schools and will submit quarterly reports to the Board.

Regarding the school at issue in this investigation, the OIG recommended that CPS retain an outside auditor of the school's student-athletics programs for a period of three years to monitor its compliance with all applicable IHSA and OSA requirements. The OIG recommended that the auditor issue a report every six months of its work to the CEO, Board of Education, and OIG.

In mid-November 2024, CPS' Internal Audit and Advisory Services team informed the OIG that it is currently auditing high school student athlete enrollment processes across the District, including student enrollment and transfers at both neighborhood and selective enrollment schools. The audit is examining enrollment data for select boys' and girls' sports at several CPS high schools, including the school at issue in this investigation. The audit will identify control weaknesses and recommend potential improvements for policies, processes, and controls across the District. According to CPS, improvements will be implemented across the District with communications and training to strengthen the controls around student athlete enrollment.

CPS also informed the OIG that due to budget cuts, it will not be hiring an outside auditor for the school at issue in this investigation.

Finally, the OIG recommended that school staff involved with enrollment at the school at issue in this investigation receive additional training on CPS' enrollment policies and procedures. According to CPS, it provided guidance documents and reviewed the enrollment policy with the school and provided the school's network with additional training.

The OIG also made the following disciplinary recommendations against specific coaches and employees at the school:

- Coach A – Termination from CPS, receive a Do Not Hire designation, and be blocked from coaching or volunteering at CPS schools. According to CPS personnel records,



Coach A voluntarily left CPS in September 2024 and has been given a Do Not Hire designation.

- Coach B – The OIG would have recommended the same discipline had he not already been terminated by CPS and received a Do Not Hire designation prior to the completion of this investigation.
- The OIG recommended that a third coach who is also a CPS employee be terminated, receive a Do Not Hire Designation, and be blocked from coaching or volunteering at CPS schools, and that a fourth coach, who is not a CPS employee, receive a Do Not Hire designation and be blocked from coaching or volunteering at CPS schools. The third coach was subsequently terminated and received a Do Not Hire designation, while the fourth coach received a Do Not Hire designation.
  - CPS confirmed that all four of the above individuals have also been blocked from coaching for CPS.
- The Administrator – The OIG recommended appropriate discipline for the Administrator and her immediate removal from OSA’s advisory council. CPS informed the OIG that the Administrator signed a non-disciplinary memorandum of understanding which directs her to review and comply with CPS student enrollment and records policies and to develop and implement policies at her school to address the enrollment issues raised by the OIG’s investigation. The Administrator also continues to be a member of the advisory council.

Finally, although the individual student athletes on the basketball team were not subjects of the investigation, the OIG noted in its report that CPS must still make disenrollment determinations for those students still fraudulently enrolled at the school or provide the basis upon which they would be allowed to remain enrolled at the school.

At the time of the OIG’s report, three basketball players as well as Coach A’s relative, who is not a basketball player, remained enrolled at the school.<sup>3</sup> Since then, one player has transferred to a non-CPS school, while the other two players as well as Coach A’s relative remain enrolled at the school. In late 2024, CPS advised the OIG that the parents/guardians of the remaining players and Coach A’s relative had provided CPS with documentation establishing their residency within the school’s attendance boundaries.

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<sup>3</sup> Other students at issue in this investigation had either graduated or transferred out of the school prior to the OIG’s report.



## B. Inadequate Background Screening For CPS Sports Officials

An OIG investigation (21-01175) found that CPS was not conducting adequate background screening for the sports officials who officiate CPS sporting events. As a result, CPS paid dozens of sports officials who should have been barred from working as vendors under CPS policy and permitted individuals with serious criminal backgrounds to work alongside CPS students, including one individual with a felony conviction for kidnapping.

In total, eight active sports officials were investigated by CPS for sexual misconduct with students

The OIG's investigation identified several flaws in CPS' screening and onboarding process for sports officials, including that the Office of Sports Administration (OSA) was not reviewing prospective sports officials against the District's Do Not Hire or debarment lists. The OIG's review identified at least 36 active CPS sports officials who were paid a total of more than \$390,000 for officiating sporting events while they were debarred or deemed ineligible for rehire.

Moreover, several of these individuals who were improperly permitted to officiate sporting events were deemed ineligible for rehire due to serious misconduct involving students, including at least eight sports officials who had been investigated by CPS for sexual misconduct with students.

The OIG also found that the criminal background checking procedures for sports officials were inadequate. Instead of subjecting prospective sports officials to its standard criminal background check process for vendors who interact with students as required by CPS policy, CPS and OSA relied on the IHSA to conduct its own, less stringent background checks.

As a result, CPS allowed individuals to officiate CPS games with criminal backgrounds that would have raised red flags had the District followed its own process.

### Former CPS Employees on Do Not Hire List Working As Sports Officials

The OIG initiated this investigation after becoming aware that a former CPS employee who was debarred from working as a CPS vendor and designated as ineligible for rehire (or Do Not Hire) had received tens of thousands of dollars from CPS for working as a sports official after his debarment.

According to CPS guidelines, former CPS employees deemed ineligible for rehire are not permitted to work as CPS vendors. This restriction applies to paid sports officials, who are registered CPS vendors.

Nonetheless, the OIG found that OSA's screening process for new sports officials did not include checking applicants against CPS' Do Not Hire or debarment lists.



The OIG spoke with multiple administrators within OSA who acknowledged that their office did not have a policy or guideline in place regarding DNH'ed former employees working as sports officials. One OSA administrator said that he was aware of at least one former employee ineligible for rehire who was an active sports official, but stated that he believed the individual had not done anything to warrant being barred from working as a sports official and claimed that CPS had not provided any guidance to OSA on this issue.

The OIG analyzed CPS' database of internal payment data and found that there were at least 36 DNH'ed former employees listed as active sports officials who had collectively received over \$390,000 in payments while DNH'ed.

These former employees' personnel files showed that while many had been deemed ineligible for rehire due to performance issues such as tardiness, several had received DNH designations due to serious misconduct involving students, including physical abuse and sexual misconduct.

“there were at least 36 DNH'ed former employees listed as active sports officials who had collectively received over \$390,000 in payments while DNH'ed”

In total, eight active sports officials were investigated by CPS for sexual misconduct with students, including four who received DNH designations due to substantiated sexual misconduct allegations involving students.

In one instance, the OIG identified a sports official who allegedly engaged in sexual misconduct with a student while officiating a CPS sporting event – years after receiving a DNH designation due to sexual misconduct. In that case, a student alleged in 2021 that the official asked her if he could take her out to dinner and “do something else later” while he was officiating a sporting event. That official had previously worked for CPS until he was terminated with a DNH designation in 2009 after two separate CPS investigations substantiated allegations that he had made sexual comments and touched students in a way that had made them feel uncomfortable.

In another case, a former employee who was found to have sent sexually explicit text messages to a student was paid over \$40,000 by CPS for officiating since he was DNH'ed in 2009. Other cases involved a sports official who was found to have pursued a relationship with a student while previously employed as a teacher, and a former security officer who had offered to pay a student for sexual favors.

### **Criminal Background Check Concerns**

Under OSA's onboarding procedures, both CPS employees and non-employees who want to become CPS sports officials must first apply for sports official certification through the Illinois High School Association (IHSA). After completing the process and becoming certified,

CPS adds the individual to its list of registered active sports officials who can be assigned to officiate CPS sporting events.

CPS does not conduct its own criminal background check, but instead relies on the IHSA to conduct a check during the IHSA certification process. CPS does not review the results of the IHSA's criminal background check – if the individual passes the IHSA check, their name is forwarded to CPS, and they are added to CPS' list of approved sports officials.

The OIG found that the IHSA's criminal background check process is less thorough than CPS' standard background check process for vendors that interact with students. CPS' background check policy requires fingerprint-based checks for vendors who have contact with students, while the IHSA's background check process uses only personal identifying information and does not require applicants to be fingerprinted. The IHSA's process also checks applicants against fewer criminal records databases than the checks run by CPS.

In addition, the IHSA background check process has a much lower bar for clearing applicants with criminal backgrounds. CPS policy provides that vendors are prohibited from working in schools if they have been convicted of any enumerated offense listed in the Illinois School Code. The IHSA, on the other hand, only automatically disqualifies individuals from certification for a much shorter list of offenses, mostly relating to drugs and crimes against minors.

CPS' practice of delegating its criminal background checks for sports officials to the IHSA is inconsistent with CPS' current background check policy that places the responsibility for this process on the District. Under CPS' policy, vendors who have contact with students must submit to CPS' fingerprint-based background check after which CPS reviews the results of the check to determine whether the vendor should be permitted to work alongside students. However, under the process in place during this investigation, CPS had no role in either administering the sports officials' background checks or reviewing the results of the checks.

During the investigation, the OIG conducted its own criminal background checks for the 36 DNH'ed former employees and a sampling of additional sports officials who had not been DNH'ed. Based on that review, the OIG identified several current sports officials with criminal convictions, ranging from minor offenses to one individual who was charged with murder and ultimately pleaded guilty to a felony kidnapping charge. If that official had gone through CPS' standard background check process for vendors, his conviction likely would have been flagged for review, but because he was certified by the IHSA, CPS apparently was not made aware of his criminal history.

The OIG also identified several sports officials with past criminal charges that did not result in convictions. CPS' background check policy provides that it will review charges that do not result in convictions, collect additional information if necessary, and determine whether the applicant should be permitted to work as a vendor in contact with students.



However, because CPS deferred to the IHSA's background checks and subsequent eligibility determinations, these sports officials' charges were not reviewed by CPS.

### **OIG Recommendations**

The OIG recommended that CPS take the necessary steps to bring the sports official certification and onboarding process into compliance with CPS policies.

First, the OIG recommended that CPS conduct a review of all active sports officials for DNH designations or criminal backgrounds that should disqualify them from working as a CPS vendor and officiating CPS sporting events.

CPS informed the OIG that it has removed from CPS' sports officials database the DNH'ed individuals identified by the OIG who were still listed as active officials so they will no longer be able to officiate CPS sporting events. CPS also sent correspondence to each DNH'ed sports official informing them that they are not permitted to referee CPS games due to their DNH status. The correspondence also included instructions on how to petition to remove their DNH designation.

CPS also told the OIG that it is currently in the process of conducting a background check "refresh" for all 1,752 active sports officials who have been paid by CPS in the past four years. Each sports official will undergo the same fingerprint-based CPS background check required for CPS vendors who interact with students. CPS will then conduct a thorough assessment of each active sports officials' background history to determine if they should be permitted to work as a vendor and officiate sporting events.

The OIG also recommended that CPS reform its onboarding process for new sports officials by requiring applicants to undergo the standard CPS background check required for other vendors who interact with students and be screened against CPS' Do Not Hire list.

CPS informed the OIG that it is in the process of implementing a new onboarding procedure for sports officials that will ensure that all newly certified IHSA sports officials who want to officiate CPS sporting events are required to go through the standard CPS vendor onboarding process for vendors who interact with students, including a fingerprint-based background check. To accomplish this, CPS will be coordinating with IHSA and monitoring IHSA's continually updated list of certified sports officials.

Sports officials will also be required to provide a renewed IHSA license to stay an active vendor. Additionally, it is planned that sports officials will take part in periodic background check refreshes alongside other vendors.



## C. High-Level Employees Conducted Improper Investigation Involving a Relative

An OIG investigation (20-01178) found that two high-level employees of a CPS office (“Employee 1” and “Employee 2”) conducted an off-the-books investigation of the interim coach (“Coach 1”) of Employee 1’s relative’s school sports team (“Team 1”). Employees 1 and 2 initiated the off-the-books case to investigate what Employee 1 believed was Coach 1’s retaliation against her relative after her relative filed a report of alleged misconduct against the team’s head coach (“Coach 2”).

In January 2020, Employee 1 reported her relative’s allegations against Coach 2 to the OIG’s Sexual Allegations Unit (“OIG SAU”), which initiated an investigation. When Coach 1 took over after Coach 2’s removal during that investigation, Employee 1 believed he reduced her relative’s playing time in retaliation for her complaint against Coach 2. Employees 1 and 2 agreed to investigate Coach 1 despite the OIG SAU’s active investigation of Coach 2 that would have included the related retaliation allegation had it been reported to the OIG. More fundamentally, though, the OIG found that Employee 1 had an obvious and highly troubling conflict of interest in the matter because the victim of Coach 1’s alleged retaliation was Employee 1’s relative.

Employee 1 had an obvious and highly troubling conflict of interest in the matter

Employees 1 and 2 also initiated the off-the-books investigation of Coach 1 at the same time their office was conducting a high-profile investigation of serious sexual misconduct allegations involving another sports team (“Team 2”) at the same school as Team 1. The Team 2 investigation, which had begun just weeks earlier, primarily involved allegations that a player secretly recorded themselves having sex with another student and distributed the video to teammates. The investigation of those allegations expanded to include other potential misconduct and ultimately resulted in several significant actions, including the termination of the school’s principal, assistant principal, and Team 2’s head coach, and cancellation of the remainder of Team 2’s season.

The OIG’s investigation found that Employee 1, Employee 2, and their office used the investigation of Team 2 to also question staff and students at the school about Employee 1’s relative and Team 1. Interviews with Employees 1 and 2 and investigative documents showed that Employee 2 and another employee from their office used Coach 1’s scheduled interview for the Team 2 investigation to also ask him about Employee 1’s relative’s playing time. Additionally, the school’s former principal told the OIG that shortly before he was fired, Employee 2 and the other employee asked him about both Team 2 and the OIG SAU’s investigation of Employee 1’s relative’s allegations against Coach 2.

Investigative documents from Employee 1 and 2’s office further showed that several other people were interviewed for the off-the-books investigation of Coach 1, including Employee

1's relative, an assistant Team 1 coach, and several of the relative's teammates, and obtained documentary evidence. None of this, however, was officially documented because the office never officially opened a case for its investigation of Coach 1.

During their interviews with the OIG, Employees 1 and 2 attempted to justify investigating Coach 1 by claiming that, at the time, jurisdiction over retaliation allegations like those against Coach 1 was unclear. In fact, CPS' sexual harassment and anti-discrimination policy in effect at the time assigned jurisdiction over retaliation cases related to adult-on-student misconduct, like Coach 1's alleged retaliation against Employee 1's relative, to the OIG SAU. Moreover, Employee 1 and 2's colleagues told the OIG that the OIG SAU should have received and investigated the allegation against Coach 1.

The OIG also found that Employees 1 and 2 failed to log or disclose information about their investigation of Coach 1. Most notably, Employee 1 admitted that although she promptly told then-CPS CEO Janice Jackson about her relative's initial allegations against Coach 2, she never told Jackson about their office's retaliation investigation of Coach 1.

This failure to document the matter or to notify Coach 1 that he was under investigation violated the applicable procedures in effect at the time.

Employees 1 and 2 also failed to log the investigation of Coach 1 in their office's case tracking system, so the standard notification letters sent to subjects of their investigations were not issued. As a result, Coach 1 did not know he was even being investigated until months after he was interviewed about Employee 1's relative. This failure to document the matter or to notify Coach 1 that he was under investigation violated the applicable procedures in effect at the time.

Finally, neither Employee 1 nor Employee 2 reported to the OIG SAU the allegation against Coach 1 or that they were investigating the matter, even as the OIG SAU investigated the related allegations against Coach 2.

More troubling still, the OIG also found that the improper investigation regarding Employee 1's relative and Team 1 appears to have influenced CPS' most dramatic action in its Team 2 investigation—the termination of the school's principal and assistant principal. Shortly after Employee 1 reported the allegations against Coach 2 to the OIG SAU, she made a follow-up complaint alleging that the assistant principal mishandled the school's response to the allegations. According to Employee 1, when the assistant principal attempted to call Employee 1's relative into her office to discuss Employee 1's complaint against Coach 2, she failed to do so discreetly and negligently "tipped off" Coach 2, causing him to text the relative. Once her relative finally met with the assistant principal, Employee 1 claimed, the assistant principal asked her relative several inappropriate, "victim-blaming" questions about their allegations.



Although Employee 1 promptly reported these incidents to the OIG SAU, both administrators were terminated just days later and before the OIG SAU could interview them about Employee 1's allegations.

Employee 1's allegations relating to the assistant principal's handling of the relative's allegations appear to have been a factor in CPS' decision to terminate the administrators. The OIG found that during a high stakes meeting between CPS leadership and members of the school's Local School Council shortly after the administrators were fired, CPS cited Employee 1's allegations against the assistant principal alongside the eventual findings in the Team 2 investigation as justification for their terminations.

At the meeting, which was attended by Employee 2 as well as several high-ranking CPS officials, the LSC members were shown a detailed, multipage document that included specific "substantiated" misconduct findings against the administrators, including Employee 1's allegations about her relative and the assistant principal. The document also alleged that the principal directed the assistant principal to conduct her own investigation of the relative's allegations despite the OIG SAU's pending investigation of Coach 2. In fact, contrary to what was eventually included in the final report for its Team 2 investigation, nearly all the reasons CPS gave for the assistant principal's termination in the document related to Employee 1's allegations and not the Team 2 case.

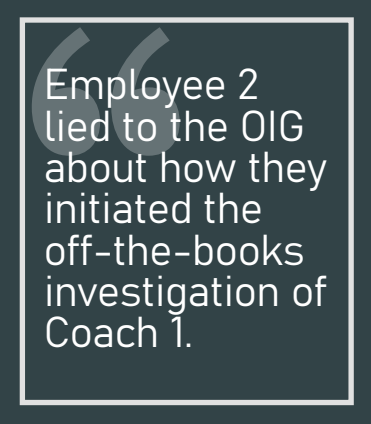
Employee 1 told the OIG that she did not know how her allegations against the assistant principal ended up in the meeting document, even though the meeting was about her own office's investigations at the school. Moreover, the Team 2 investigation report as well as the OIG SAU's report for its investigation of Coach 2 were still months away from completion at the time of the meeting, and no representatives of the OIG participated in it. As such, the OIG found that the only reasonable source for the information in the meeting document regarding the administrators' treatment of Employee 1's relative was Employees 1 and/or 2. It thus follows that the district partially based both administrators' terminations on Employee 1's allegations—claims that had not been fully investigated or substantiated.

Finally, during their OIG interviews Employees 1 and 2 both made false, misleading, and contradictory statements. Employee 1 told investigators that she recused herself from all investigations her office conducted at her relative's school, but when pressed, was unable to provide a consistent date or time period for her recusal.

In fact, email records showed that Employee 1 continued to be invited to and accept invitations to meetings with CPS leadership in February 2020 about the sexual misconduct investigations at her relative's school. This included the previously discussed meeting between CPS leadership and the LSC members, which Employee 1 planned on attending but ultimately missed due to illness. In an email after that meeting, Employee 1 asked Employee 2 to update her on what happened.



Employee 2 lied to the OIG about how they initiated the off-the-books investigation of Coach 1. Initially, Employee 2 stated that when she and a colleague were interviewing Coach 1 for their Team 2 investigation, the topic of Employee 1's relative's playing time came up naturally during the discussion. This set off a "bell" in Employee 2's mind, she claimed, because Employee 1 had recently mentioned that her relative's playing time had dropped. Employee 2 subsequently suggested to Employee 1 that they should investigate, and Employee 1 agreed.



Employee 2 lied to the OIG about how they initiated the off-the-books investigation of Coach 1.

When the OIG later interviewed Employee 1, however, she told investigators that she and Employee 2 in fact talked about Coach 1 and her relative's playing time before his interview for the Team 2 case and agreed that they should ask Coach 1 about both Team 2 and Employee 1's relative. An email from two days before Coach 1's interview showed that Employee 1 even checked in with Employee 2 about when the interview was to take place. When the OIG then interviewed Employee 2 a second time, she admitted that she and Employee 1 had planned to question Coach 1 about Employee 1's relative ahead of time. When asked to reconcile this with her statements from her first interview, she claimed she didn't recall what she had previously said.

Employee 1 and Employee 2 also told OIG investigators contradictory accounts of a troubling allegation related to their office's Team 2 investigation. During her first OIG interview, Employee 1 said that members of Team 2 falsely accused her relative of possessing and possibly sharing the sex video at the center of the Team 2 investigation and suggested they did so in retaliation for her relative's complaint against Coach 2. Despite the ostensible gravity of such an allegation, Employee 1 told investigators that while Employee 2 talked to her relative about the allegation, it wasn't formally investigated and Employee 1 let her relative handle the issue at school.

When the OIG talked to Employee 2, however, she told the OIG that she was not aware of any allegation involving Employee 1's relative possessing the sex video and never spoke to the relative about it. Employee 2 added that their office had been trying to find a copy of the video and would have followed up on any allegation that the relative possessed it.

When the OIG confronted Employee 1 with Employee 2's assertions, she told the OIG an even more detailed account of the incident and her relative's conversation with Employee 2. Employee 1 said that she didn't know why Employee 2 didn't remember but speculated that it might not have been as significant for Employee 2 as it was for her and her relative.

Ultimately, the OIG did not obtain sufficient evidence to determine whether Employee 1 or Employee 2 told the truth about the video allegation. Whatever the case may have been, the allegations pertaining to the relative's possession of the video were not documented as part of its investigation of Team 2, nor did it discuss it in its Team 2 investigative report.

Taken together, Employee 1's and Employee 2's conduct in this case fundamentally undermined the integrity and fairness of their office's investigations during a contentious, highly public investigation at Employee 1's relative's school. Their actions also risked interfering with the OIG SAU's investigation of Coach 2 and disregarded best investigative practices. Finally, their conduct appears to have improperly influenced CPS' terminations of the school's principal and assistant principal.

The OIG found that Employees 1 and 2 violated CPS' non-discrimination, harassment, and retaliation policy in place at the time by withholding the allegations against Coach 1 from the OIG SAU and instead initiating their off-the-books investigation—an investigation that was plainly within the OIG SAU's jurisdiction according to that policy. Moreover, because of Employee 1's conflict of interest in the matter, her investigation of Coach 1 was not fair or impartial and thus violated her office's own procedure manual. Employees 1 and 2 and their office further violated the procedure manual because they did not properly log or document the off-the-books investigation of Coach 1, which caused him to not be timely notified that he was under investigation. Finally, the OIG found that Employees 1 and 2 violated Board rules and CPS policy by making false statements to OIG investigators.

The OIG recommended that Employee 1 receive appropriate discipline up to and including termination. Employee 1 resigned from CPS and has since received a Do Not Hire designation. The OIG recommended that Employee 2, who resigned before the OIG completed this investigation, receive a Do Not Hire designation. Employee 2 subsequently received this designation.

Finally, the OIG recommended that Employee 1 and 2's office implement a comprehensive conflict-of-interest policy covering all aspects of its operations. In November 2024, the office implemented a conflicts-of-interest policy in its updated procedure manual that, among other things, restricts their office from investigating matters involving any employee's family member and requires the employee's recusal from any decision relating to that complaint.



## D. Mayoral Campaign's Improper Outreach to CPS Staff and Students

On January 11, 2023, Chicago news outlets reported that CPS teachers had received emails from the then-incumbent mayor's ("Elected Official A") reelection campaign at their CPS email addresses. The emails, which were sent by a deputy campaign manager ("Campaign Employee A") for Elected Official A's campaign ("Campaign"), asked teachers to inform students about the Campaign's volunteer program and said they would be eligible for class credit if they volunteered.

The following day, Elected Official A held a televised press conference to address Campaign Employee A's emails. Elected Official A said the messages were a well-intentioned mistake, that no one else on the Campaign knew of them prior to January 11, 2023, and that there had been no coordination between the Campaign and CPS. She also said that the Campaign's attorney had previously provided Campaign staff with ethics training and that after news of Campaign Employee A's emails broke, staff were reminded of the "impenetrable wall" between the Campaign and local government. Finally, Elected Official A said the Campaign would "cooperate fully" with the OIG.

CPS' Code of Ethics broadly prohibits CPS employees and CPS officials from using their positions to endorse political candidates; engaging in political activity at work; or using CPS resources for political activity. If CPS teachers or administrators did as the Campaign emails asked—steered students specifically to the Campaign with the promise of earning credit for volunteer work—they would have plainly violated the Code. Moreover, because Elected Official A was the incumbent mayor of Chicago and had (at that time) the power to appoint members of the Chicago Board of Education, CPS' CEO, and to steer District policy, she exerted significant leadership authority over CPS and its employees. As such, CPS employees who received Campaign Employee A's emails may have feared that they'd be punished if they failed to pass along the Campaign's offer to students, or conversely, that they might be rewarded for doing so.

Accordingly, the OIG initiated an investigation (23-00047) to determine the extent of Campaign Employee A's outreach to CPS, whether any CPS students in fact volunteered for the Campaign due to the outreach, and whether there was any coordination between the Campaign and CPS.

Ultimately, the OIG found that Campaign Employee A sent 219 emails to 133 CPS employee email addresses on behalf of the Campaign, most of which were volunteer solicitations. The Campaign sent more than 7,500 emails to 247 CPS email accounts. Most of these were sent from a general Campaign email address and appeared to be "blast" emails sent to CPS addresses that had been subscribed, in one way or another, to receive updates from the Campaign.

The OIG, however, did not find evidence that the emails were the result of coordination between the Campaign and CPS. Rather, the OIG found that the Campaign's poor



management and oversight of its student volunteer recruitment efforts led to the improper outreach to CPS employees.

“Eight CPS students “were made to sign the Campaign’s Confidentiality and Non-Dis... Agreement even though [they] were all younger than 18... and the Campaign never informed the students’ parents.”

The OIG further found that although most CPS employees did not appear to communicate Campaign Employee A’s volunteer solicitations to students or student families, at least a few employees at CPS schools did. As a result, the OIG found that eight CPS students in fact volunteered for the Campaign following Campaign Employee A’s outreach. Moreover, the OIG found that all eight were made to sign the Campaign’s Confidentiality and Non-Disparagement Agreement even though the students were all younger than 18 years old at the time and the Campaign never informed the students’ parents about the agreements. The OIG, however, did not find evidence that the students received credits for their volunteer work.

Finally, despite Elected Official A’s public assurance that the Campaign would fully cooperate with the OIG’s investigation, the OIG found that the Campaign ultimately provided only limited cooperation. Specifically, the Campaign failed to produce hundreds of emails or other digital evidence the OIG requested from the Campaign in a January 13, 2023, document request. This failure to fully cooperate impeded the OIG’s ability to fully investigate the extent other Campaign staff and/or Elected Official A herself may have been aware of Campaign Employee A’s email outreach prior to January 11, 2023, when news of the emails first broke.

### **Campaign Emails Effectively Asked CPS Employees to Violate CPS Policy and Guidance, Raised Significant Constitutional Issues**

The OIG found that between August 2022 and January 2023, Campaign Employee A improperly sent over 200 student volunteer recruitment emails on behalf of the Campaign to CPS employees. The OIG also found that Campaign Employee A’s emails were just a fraction of what the Campaign sent to CPS employees. Between January 2022 and February 2023, it sent thousands of “blast” email messages to CPS addresses that had been subscribed to receive Campaign updates.

Significantly, Campaign Employee A’s emails effectively asked the employees to do what CPS policy and classroom guidance forbid—promote a specific candidate’s campaign.

Under the CPS Code of Ethics, CPS officials and CPS employees are broadly prohibited from using their CPS position to endorse political candidates; engaging in political activity at work; or using CPS resources for political activity. The Code also bars CPS officials and CPS employees from forcing other CPS employees to perform political activities or awarding them additional compensation or benefits for such work.

Other CPS guidance documents also warned against engaging in political activity during the workday, while in the classroom, or while using CPS resources. CPS' April 2022 Ethics Guidelines for Political Activity, for example, stated that CPS employees cannot use CPS time or resources for political activity and that political campaigns should not use CPS email to solicit volunteers and donations. Similarly, CPS' 2022-23 classroom election guidelines stated that teachers may not use instructional time or their time at school to advance their own positions on political issues or to advocate for their preferred candidates and should refrain from posting election materials on Board property that favors one candidate.

If CPS employees steered students specifically to Elected Official A's campaign—or, even worse, promised students credit for such work—they would have plainly violated the Code and CPS' elections guidance.

It is important to note, too, that Campaign Employee A's emails were not just for *any* candidate, but rather the incumbent mayor of Chicago. At the time, Elected Official A was empowered to appoint all Chicago Board of Education members, select CPS' CEO, steer District policy, and in effect exerted significant leadership authority over CPS.

CPS employees who received Campaign Employee A's emails were thus asked to make a professionally and ethically fraught choice: pass along the message to students and violate CPS policy or ignore outreach from the highest elected official in the city.

Campaign Employee A's emails thus also potentially raised significant constitutional issues for both CPS employees and students. The First Amendment's protection of free speech and assembly includes both the right to speak and associate freely and to not speak or associate at all. The U.S. Supreme Court has held that public employees (like CPS teachers) do not forfeit these rights simply because they work for the government. Public employees (other than political appointees) generally cannot be discharged due to their political beliefs or associations, nor can they be compelled to adopt or support a particular belief or candidate as a condition of their employment. In fact, the Supreme Court has held that state-compelled speech and association are particularly offensive to the Constitution and rarely permissible.

Similarly, students maintain their First Amendment rights while in school. The Supreme Court has placed significant limits on when student speech can lawfully be suppressed by schools and has also held that public schools generally cannot compel student speech or association. Finally, the Court has held that if schools make certain resources, such as meeting spaces or funding, available to students, they generally cannot discriminate against students wishing to access them based on the content of the students' speech or beliefs.

Once again, as the incumbent mayor of Chicago, Elected Official A exerted significant leadership authority over CPS and its employees. In effect, she could be seen as every CPS employee's "boss." Employees who received Campaign Employee A's solicitation, or students who were told about it, may thus have felt compelled to participate in Elected



Official A's campaign by sharing the campaign solicitation or volunteering, either out of fear of retaliation if they refused or hope for special favor if they complied.

Moreover, any offer of CPS credit to students for volunteering with the Campaign would have risked discriminating against students who favored other mayoral candidates or no candidate at all, who would have presumably not had access to the same sort of "extra" credit as students who volunteered for Elected Official A's campaign.

Ultimately, the OIG did not obtain evidence establishing that CPS employees or students felt compelled or intimidated into working with the Campaign, nor did it find that the Campaign intended to compel employees or students to do so. Nevertheless, Campaign Employee A's emails still potentially raised these significant and troubling constitutional issues.

### **The Campaign's Emails to CPS Employees Were the Result of Its Poor Management of its Student Volunteer Recruitment Efforts**

The OIG found that Campaign Employee A's volunteer solicitations were the product of the Campaign's poor management of its student volunteer recruitment efforts.

#### **1. *The Campaign Previously Received At Least Two Warnings About Sending Electioneering Emails to Public Employees***

Prior to January 11, 2023, the Campaign had been warned about its emails to other public employees at least twice—by the Chicago Board of Ethics in a March 2022 letter and by the City Colleges of Chicago ("CCC") in an August 2022 phone call—yet seemingly failed to communicate these warnings internally. According to the Board of Ethics, it sent its letter to several high-ranking Campaign officials and hand-delivered it to Elected Official A. During her OIG interview, however, Elected Official A claimed that she was "100 percent confident" she never received the letter.

[T]he Campaign had been warned about its emails to other public employees at least twice...yet seemingly failed to communicate these warnings internally.

Similarly, Elected Official A and other senior members of her campaign told the OIG they had been unaware (until January 11, 2023) that Campaign Employee A had been warned by a CCC official to stop emailing CCC employees. And when the OIG spoke to the CCC official, she said that Campaign Employee A in fact resumed emailing CCC employees just weeks after the warning.

The Campaign, of course, also continued to send thousands of emails to CPS employees, including Campaign Employee A's volunteer solicitation emails.

## ***2. The OIG Found No Evidence that Campaign Staff Received Campaign Ethics Training***

The OIG also found no evidence Campaign staff received campaign ethics training. Campaign Employee A and two other high-level Campaign staff told the OIG they never received the ethics training Elected Official A mentioned in her press conference, and Campaign Employee A also said she could not recall any specific discussions about an ethical wall or any specific instructions to refrain from emailing government employees. The Campaign itself also failed to produce any records demonstrating that staff received campaign ethics training.

During her OIG interview Elected Official A said the Campaign had been clear that there had to be a separation between the Campaign and City work and that the Campaign discussed “being extraordinarily careful” about communicating with people “on the official side.” When asked if these conversations were had with lower-level staff, however, Elected Official A said she couldn’t answer because she wasn’t involved in those discussions. When asked about the training from the Campaign’s attorney she mentioned at her press conference, Elected Official A first said that she thought it had taken place but later acknowledged she had misspoken.

## ***3. Underage CPS Students Who Volunteered Were Made to Sign Non-Disclosure Agreements Without Their Parents Being Notified***

According to Campaign records, eight CPS students volunteered for the Campaign following Campaign Employee A’s outreach. Before they started, all eight students were made to sign the Campaign’s Confidentiality and Non-Disparagement Agreement, even though none of them were 18 years old and their parents were not notified. The NDAs were effective for three years, obligated signors to keep confidential any information learned through their campaign work, and barred signors and the Campaign from disparaging each other.

During her OIG interview, Elected Official A denied knowing that the students signed the agreements but acknowledged that this was “[o]f course” inappropriate.

Although a contract signed by a minor is not automatically void in Illinois—minors may elect to ratify them once they turn 18—the agreements nonetheless further demonstrated the Campaign’s poor management of its student volunteer recruitment.

## ***4. Evidence Suggested That Campaign Employee A’s Emails May Have Been Known Within the Campaign, But the Campaign’s Failure to Produce Emails Impeded the OIG’s Ability to Fully Investigate***

Finally, the OIG found evidence that suggested Campaign Employee A’s CPS emails may have been more widely known within the Campaign prior to January 11, 2023. Campaign records and interviews with high-level staff showed that the Campaign had previously struggled with volunteer recruitment. Campaign Employee A was hired, at least in part, due to her prior





volunteer recruitment experience. Although mainly responsible for budget duties, Campaign Employee A was also tasked with improving volunteer recruitment and running an internship program for the Campaign.

The OIG also learned that Campaign Employee A didn't do her CPS recruitment alone. Campaign Employee A told the OIG that she obtained CPS email addresses by searching for them online, mostly in August 2022, along with five of the Campaign's paid interns. Another Campaign staffer who supervised those interns told the OIG that while she was aware that they were helping Campaign Employee A with a "project," she hadn't known the details. Text messages between Campaign Employee A and the staffer, however, showed that they discussed one intern's work on "internship recruitment" emails.

Finally, Campaign Employee A told the OIG that she discussed aspects of her volunteer recruitment efforts with her supervisor, Campaign Employee B, who was also the head of the Campaign. According to Campaign Employee A, Campaign Employee B knew she was recruiting students but not the "scope" of her efforts or that she targeted CPS. Nevertheless, Campaign Employee A said she told Campaign Employee B how many volunteers she was able to recruit and how many responses she'd received to her outreach. Campaign Employee A also said Campaign Employee B may have approved the language she used in her solicitation emails. During her own interview, Campaign Employee B acknowledged that she and Campaign Employee A discussed the volunteer recruitment efforts, but said they only spoke in "broad terms" and not specifically about CPS.

Ultimately, though, the OIG was unable to determine whether Elected Official A or other Campaign staff specifically knew of Campaign Employee A's emails to CPS. In large part, this was due to the Campaign's limited cooperation with the OIG, despite Elected Official A's public assurances to the contrary. Immediately after initiating this investigation, the OIG sent the Campaign a production request for documents and information, including various electronic communications and files related to Campaign Employee A's recruitment efforts. Although the Campaign produced some responsive materials, it nevertheless turned over only a small portion of the emails it identified as responsive to the OIG's request. These records would have been critical to determining the extent to which others in the Campaign knew of, or even directed, Campaign Employee A's emails.

### **The OIG Did Not Find Evidence of Coordination Between the Campaign and CPS or that Students Earned Credit, but Did Find that the Mayor's Office Reviewed a CPS Press Response**

The OIG did not find evidence establishing that CPS assisted or coordinated with the Campaign. The OIG, for example, did not obtain emails or other communications suggestive of such coordination, nor did it find evidence that CPS leadership knew of the Campaign's emails prior to January 11, 2023. Once Campaign Employee A's emails became known, the



OIG also found that CPS generally responded appropriately, with one high-level CPS official immediately calling Campaign Employee A and telling her to stop sending the emails.

Additionally, although some school-based staff shared the Campaign's volunteer opportunity with students, this sort of dissemination was limited, and many more recipients appear to have deleted or ignored the emails. Finally, the OIG found no evidence that any CPS students received any credit for volunteering.

Notably, however, as CPS' Office of Communications prepared its response to an initial press inquiry about Campaign Employee A's emails, it sent its draft statement to the Mayor's Office for review and ultimately incorporated its edits, which resulted in a shorter final response. This is even though the very purpose of the response was to establish CPS' independence from Elected Official A's campaign.

According to the Office of Communications, it is standard practice for CPS to share press responses with the Mayor's Office for review. When CPS was crafting its press response regarding the Campaign emails, one Communications employee said, she did not recall any conversations about deviating from that practice. The employee also said that the final CPS response, while shorter, was still sufficient.

Ultimately, the OIG found that CPS' communications with the Mayor's Office here was more a result of CPS uncritically following usual protocols rather than intentionally coordinating with Elected Official A or the Campaign. Nevertheless, it risked enabling the very sort of improper coordination that CPS leadership seemingly wished to avoid.

### **The OIG's Recommendations**

In November 2024, Chicagoans elected their first school board members, and in two years, Chicago will move to a fully elected board. With the advent of school board member elections, opportunistic campaigns could attempt to use CPS students, employees, and resources to advance their candidate. The OIG anticipates that school board campaigns will be highly visible and potentially contentious and may involve the CPS community even more than mayoral elections. Although CPS already has important safeguards in place to protect against improper political activity—including its recently revised Code of Ethics, with specific provisions for school board members—the OIG cautions that the District must maintain vigilance against candidates and campaigns attempting to exert pressure on CPS employees and students.

To that end, the OIG recommended that CPS require candidates for an elected seat on the school board and/or on a local school council to complete and file an attestation that they are aware of and have reviewed the CPS Code of Ethics and, further, that they will not send CPS employees or students electioneering communications at their "cps.edu" email addresses.



In response, CPS told the OIG that while it cannot require candidates to sign such attestations, it would send candidates guidance on their ethical obligations under the CPS Code of Ethics. According to CPS, in September 2024 board member candidates for the November 2024 board elections were sent this guidance and were further informed that CPS staff cannot engage in political activities using CPS personnel, time, property, or resources, or that create an impression that CPS supports particular candidates or referendums. CPS also provided the board members appointed in October 2024 with ethics training and provided all CPS employees with election ethics guidance in August 2024.

The OIG also suggested that CPS consider amending its policies to prohibit CPS and/or individual schools from offering students any sort of credit in exchange for engaging in partisan political activities. Although recent CPS classroom guidance appears to leave open the possibility of students receiving service-learning credits for participating in political campaigns outside of school time, CPS advised the OIG that no students receive credit for partisan political activities. According to CPS, students no longer can receive credits for volunteer activities, and service-learning projects cannot be partisan in nature.

CPS also recently advised the OIG that it has created email filter rules that delete or quarantine political emails before they reach CPS email address inboxes.

The OIG did not recommend discipline for any CPS employees or CPS officials in this matter. Although at least some school-based employees shared Campaign Employee A's message with students and their families and thus technically violated CPS policy, the Campaign's emails, in effect, were an unfair inducement to violate CPS policy. These employees faced an unusual, unfair, and ethically fraught decision: pass along Campaign Employee A's message to students and violate CPS policy or ignore outreach from the campaign of Elected Official A, the highest elected official in the city. Under these circumstances, the OIG found that discipline would not be appropriate.



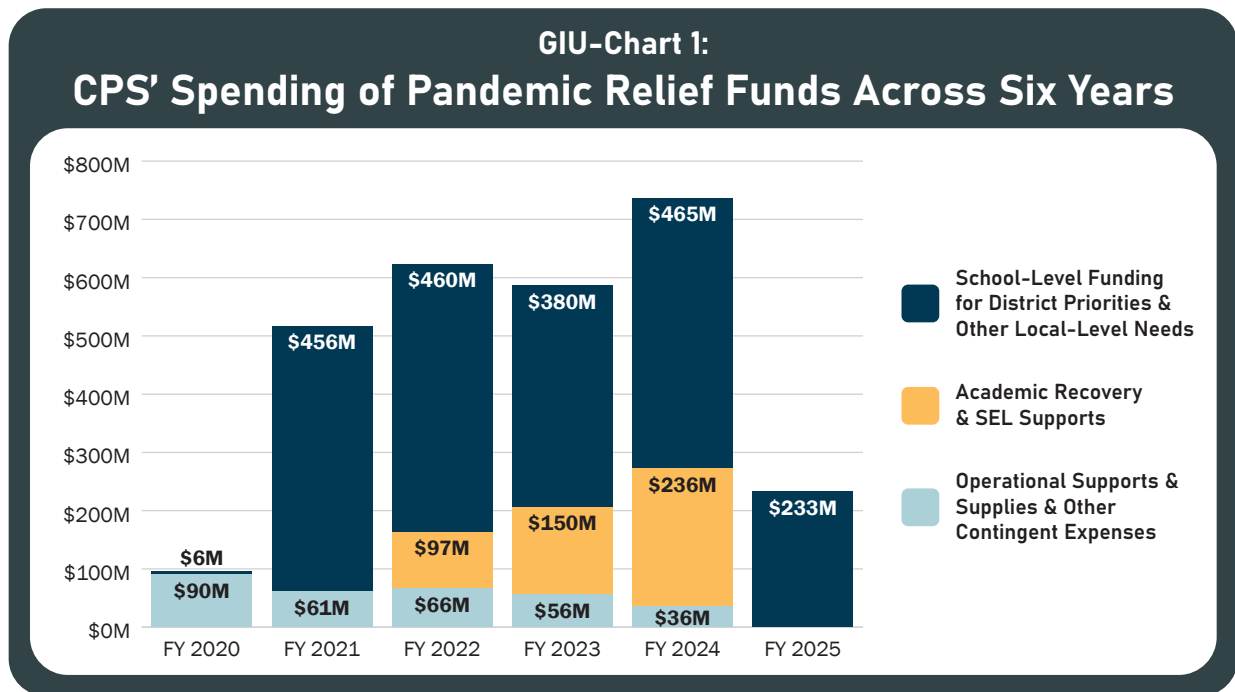
## E. Pandemic-Aid Spending and Paycheck Protection Program Investigations

In Fiscal Year 2024, the OIG continued to track the District's spending of pandemic relief funds and continued to investigate fraud, waste and abuse with respect to pandemic era programs, such as the Paycheck Protection Program (PPP). Below is a summary of the District's spending of pandemic relief funds, followed by a discussion of the OIG's PPP investigations completed in Fiscal Year 2024.

### CPS' Spending of Pandemic Relief Funds

By the end of Fiscal Year 2024, CPS had spent approximately \$2.6 billion of the \$2.8 billion in pandemic relief funding allocated to it through the federal Elementary and Secondary School Emergency Relief Fund (ESSER), leaving \$233 million to be spent during Fiscal Year 2025.

In its Fiscal Year 2025 budget, CPS provided the following breakdown of its past and expected federal pandemic relief expenditures by category:



Source: CPS FY 2025 Budget Book

### 1. Pandemic Relief Funding Expenditures Fiscal Year 2020 to Fiscal Year 2024

The \$2.8 billion in ESSER funds allocated to CPS represented an unprecedented infusion of one-time federal funding into the District. Given the amount of funding, as well as the minimal restrictions on expenditures and compressed timeline for using the funds, the OIG proactively reviewed ESSER expenditures for fraud, waste, and abuse. As discussed

in the OIG’s Fiscal Year 2021, 2022 and 2023 annual reports, the OIG conducted several investigations and performance reviews that involved ESSER funds, such as the OIG’s performance review that found that ESSER funds were contributing to the rising costs associated with excessive “Extra Pay” for staff.

## 2. ESSER Spending Transparency and the “Fiscal Cliff”

Despite the massive windfall of ESSER funding over the last four fiscal years, as of this past summer, CPS faced an initial budget deficit of \$505 million in Fiscal Year 2025, a projected deficit between \$509 million and \$758 million for Fiscal Year 2026, and similarly large deficits for the following years. CPS has acknowledged in its public budget presentations that this deficit is due in part to the expiration of federal relief funding, which covered some of the expenses that are now contributing to the current and projected deficits.<sup>4</sup> In other words, CPS is now staring down the “fiscal cliff” that commentators, administrators, board members, and others warned of over the preceding four years.

It is reasonable for the public to question why CPS is facing such a daunting fiscal cliff, given that it was a well-known concern of school districts across the country. In our last three annual reports, the OIG has pressed CPS for greater transparency in explaining to the public exactly where and how ESSER funds were being spent and how these expenditures would affect the District’s

finances in the future. The OIG noted that the District’s ESSER spending disclosures became more detailed from year to year, but expenditures were often lumped together under broad categories without sufficient detail to identify specific items or services being purchased.

Of particular concern to the OIG and others was the District’s lack of transparency regarding the percentage of ESSER spending being directed toward employee salaries and benefits and the number of new full-time employee positions being created through ESSER spending.<sup>5</sup>

In recent annual reports, the OIG noted that data available from state and federal sources provided a more complete picture of CPS’ ESSER spending being allocated to salaries and benefits. CPS’ federally-mandated ESSER III application, which was submitted in February

### What Are ESSER Funds?

On March 27, 2020, Congress set aside approximately \$13.2 billion of the \$30.75 billion allotted to the Education Stabilization Fund through the Coronavirus Aid Relief, and Economic Security (CARES) Act for the Elementary and Secondary School Emergency Relief Fund (ESSER) Fund. The Department awarded these grants . . . to address the impact that COVID-19 has had, and continues to have, on elementary and secondary schools across the Nation.

-OESE.ed.gov

<sup>4</sup> FY 2025 Budget Presentation, Public Budget Hearing, July 16, 2024.

<sup>5</sup> CPS budgeted for 45,964 full time positions for FY 2024 versus 38,037 positions for FY 2020 prior to the creation of ESSER. Data available through the CPS Budget Interactive Dashboard at <https://www.cps.edu/about/finance/budget/budget-2020/>.



2022 and not widely publicized by CPS, stated that \$1 billion, or 55% of CPS' ESSER Round III funding, was used to cover 11,312 existing and new employees.<sup>6</sup> The Illinois State Board of Education's ESSER Spending Dashboard reflected that as of October 2023, 75% of the District's ESSER funds had been spent on salaries and benefits — a figure that was again not emphasized by CPS in its spending disclosures.<sup>7</sup>

This lack of transparency may have contributed to the relatively limited public awareness and discussion about whether it was financially prudent for CPS to use such a significant portion of ESSER funds to create new, full-time, permanent positions as opposed to one-time costs that would not continue to require funding once ESSER funds had been exhausted.

As the District transitions from spending ESSER funds to grappling with budget deficits and seeking solutions, CPS should more clearly explain to the public the role that its use of one-time ESSER funding to increase the number of permanent positions played in causing the District's current budgetary problems.

### PPP Fraud by CPS Employees

In Fiscal Year 2024, the OIG continued to investigate suspected cases of PPP fraud involving CPS employees. In these cases, employees submitted fraudulent loan applications with false personal business information to obtain forgivable loans that were designed to help businesses keep employees on their payroll that may have otherwise been laid off due to the economic uncertainty brought on by the pandemic.

PPP fraud is a serious crime, and the OIG is engaged in ongoing discussions with law enforcement agencies regarding the OIG's PPP matters. Critically, because the loans in this program are nearly all forgiven, the recipients generally did not have to pay them back and given the relatively few controls in place to prevent fraud in the program, the incidence of fraud nationwide was extremely high.

#### What Are PPP Loans?

The Paycheck Protection Program... provides small businesses with funds to pay up to 8 weeks of payroll costs including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities.

- U.S. Department of the Treasury

Summaries of the OIG's PPP investigations are set forth below. The OIG has also reported on its work in this area in previous annual reports, as well as in a September 6, 2023, [Significant Activity Report](#).

<sup>6</sup> See OIG FY 2023 Annual Report, Pandemic Relief Spending Update.

<sup>7</sup> ISBE ESSER Spending Dashboard, available at [www.isbe.net/Pages/ESSER-Spending-Dashboard.aspx](http://www.isbe.net/Pages/ESSER-Spending-Dashboard.aspx). As of October 2024, the Dashboard shows that 66% of CPS' ESSER funds have been allocated to salaries and benefits.



» *School Administrator Claimed False Self-Employment Income to Fraudulently Obtain PPP Loan (23-00170)*

A school administrator fraudulently obtained a PPP loan of more than \$20,000 by falsely claiming over \$100,000 in self-employment income in 2020. At the time of the investigation, the administrator's annual salary at CPS was more than \$120,000.

During the investigation, the administrator admitted that she applied for and received the loan and that the gross income listed on her PPP loan application was false. She claimed that she earned some self-employment income in 2020 and that the amount listed on the application was her combined self-employment income and CPS salary.

However, the administrator did not respond to requests for evidence that she had earned any self-employment income in 2020 and instead resigned her CPS employment. Based on the evidence, the OIG recommended that the school administrator receive a Do Not Hire designation in her personnel file and would have recommended her termination had she not already resigned. Accordingly, a Do Not Hire designation was placed in her personnel file.

» *School Administrator Received Fraudulent PPP Loan (21-000174)*

While investigating a school administrator for violations of the residency policy and time fraud, the OIG found that the administrator received a fraudulent \$12,500 PPP loan. The administrator resigned during the investigation and did not respond to the OIG's requests for an interview concerning the PPP loan.

At the time of the investigation, the administrator's annual salary was over \$140,000.

A PPP loan application in the administrator's name claimed that the administrator had grossed exactly \$60,000 in self-employment income in 2020 from a construction business located at the administrator's suburban home. The investigation determined that this business was fictitious. Further, the administrator had repeatedly affirmed to CPS that she had no outside business income.

The administrator initially agreed to cooperate with the OIG's investigation; however, she instead resigned prior to sitting for an interview. The administrator did not respond to the OIG's continued inquiries after the resignation.

Regardless, loan records showed that the administrator participated in the submission of the falsified loan application and received the PPP loan proceeds. The OIG therefore concluded that the administrator was responsible for acquiring the fraudulent PPP loan.

The administrator had already resigned and received a Do Not Hire designation following the OIG's residency investigation. Otherwise, the OIG would have recommended that CPS terminate the school administrator's employment and place a Do Not Hire designation in her personnel file for the findings in the PPP investigation.



» *School Administrator Inflated Self-Employment Income to Obtain Fraudulent PPP Loan (23-000163)*

An OIG investigation found that a school administrator falsely stated that she had more than \$80,000 in revenue from a side business to acquire a fraudulent PPP loan of more than \$17,000 that was later forgiven in full.

At the time of the investigation, the administrator's annual salary was over \$120,000.

The administrator admitted to the OIG that she had applied for and received the PPP loan and that the gross income of over \$80,000 from the side business that she claimed on her loan application was false. The administrator also told the OIG that she had simply made a mistake on her application and that she had a legitimate side business from which she had earned as much as \$40,000 in prior years. However, when asked for proof of that claim, the administrator was unable to provide any evidence that she had actually earned anywhere near that amount from her side business.

The OIG recommended that the school administrator's employment be terminated and that the Board place a Do Not Hire designation in her personnel file. The administrator resigned, and a Do Not Hire designation was placed in her personnel file.

» *Sexual Allegations Unit Employee Fraudulently Obtained PPP Loan (23-000840)*

A former employee with the OIG's Sexual Allegations Unit fraudulently obtained a PPP loan of more than \$20,000 before she began working for the OIG. At the time of the investigation, the employee's annual salary was \$68,000.

During her interview with the OIG, the employee admitted to signing and submitting a PPP loan application and receiving the loan proceeds. The employee also admitted that information on the application was false, including the claim that they were eligible for the loan because she grossed over \$100,000 in 2019 as a sole proprietor in the beauty salon industry.

The employee claimed that a family member completed the application on her behalf and that she did not know the application contained false information. She also claimed that she believed she was eligible for a PPP loan because she owned and operated a small non-profit entity, even though the non-profit grossed only a nominal amount of income.

The employee resigned her employment shortly after her interview with the OIG and did not provide the OIG with any evidence supporting her claims. Loan records further indicated that the employee knowingly acquired the loan and requested that the loan be forgiven in full.

The OIG recommended that the employee receive a Do Not Hire designation in her personnel file. The Board followed the OIG's recommendation.





» *School Administrator Obtained PPP Loan by Falsely Inflating Income (23-000168)*

An OIG investigation established that a school administrator obtained a fraudulent PPP loan of more than \$20,000 by falsely claiming on her loan application that her catering business had a gross income of over \$100,000 in 2019.

When the administrator submitted her loan application in 2021, she was employed by CPS as a teacher, and her annual salary was over \$94,000. At the time of the investigation, the administrator's annual salary was over \$124,000.

During her interview with the OIG, the administrator admitted that the gross income listed on her loan application was false and that the most her catering business had ever earned in a year was about \$15,000. The administrator claimed that her accountant completed the application and inflated her business income without her knowledge; however, the administrator admitted that she personally signed and submitted her loan application.

The administrator also admitted that she applied for and received full forgiveness for her PPP loan. The OIG spoke with the accountant who denied responsibility for preparing the fraudulent application. The administrator failed to provide any further evidence to the OIG corroborating her claims and instead repeatedly evaded or ignored the OIG's requests.

The OIG recommended that the Board terminate the administrator's employment and place a Do Not Hire designation in her personnel file. The administrator resigned, and a Do Not Hire designation was placed in her personnel file.

» *Sexual Allegations Unit Employee Fraudulently Obtained PPP Loan (23-000613)*

A former employee for the Sexual Allegations Unit of the Office of Inspector General obtained a fraudulent PPP loan of more than \$20,000 before she began working for the OIG Sexual Allegations Unit. The employee resigned during the OIG's investigation. While employed by the OIG, her annual salary was over \$82,000.

During her interview with the OIG, the employee admitted to receiving the PPP loan proceeds and told the OIG that she believed she was eligible for the loan because she started a small business just before the pandemic started. The employee claimed that a friend of a friend completed and submitted her loan application, and that the employee never saw the completed application or supporting documents that falsely stated she earned exactly \$100,000 from self-employment in 2019. The employee could not recall the name of the person who completed her application but told the OIG she would provide the person's name and contact information, and records showing she spent the loan proceeds on inventory for her business.

The employee did not provide the OIG with the name of the person who supposedly completed her application or any other evidence supporting her claims and resigned four days after her OIG interview. The OIG also acquired records of the employee's PPP loan



which indicated that the employee knowingly acquired the loan and requested and received loan forgiveness for the total amount, including principal and interest.

The OIG recommended that the Board place a Do Not Hire designation in the employee's personnel file. The Board followed the OIG's recommendation.



## F. Cases Involving Arrests or Related Criminal or Civil Proceedings

The OIG monitors cases in which employees of CPS or vendors are arrested and charged with criminal offenses. Several of those cases are discussed below. Also discussed in this section are cases in which the OIG monitored or investigated alleged criminal conduct in cases with associated civil proceedings.

» *School Engineer Harassed and Made Violent Threats Against Multiple Women, Leading to Orders of Protection (22-001691)*

An OIG investigation established that a former engineer employed by a CPS vendor and assigned to a CPS high school sent emails containing graphic, violent threats to multiple local women, including emails sent from his cps.edu email account. As a result of the emails, orders of protection were entered against the engineer in two separate matters. CPS instituted a vendor block on the engineer immediately after receiving notice of these allegations. The vendor terminated the engineer's employment shortly thereafter.

The OIG identified over 30 emails that the engineer sent from his CPS email account in which he harassed and made violent threats against two women. Additional records established that the engineer sent dozens of other threatening emails from his personal email account to at least two other women. The OIG interviewed two of the women who received the threatening emails. They both stated that they had no connection to the engineer and did not know why they were a target of his harassment.

The engineer did not respond to the OIG's requests for an interview. However, given the extensive evidence that the engineer was responsible for the threatening emails, the OIG concluded that he likely committed criminal offenses, including, at a minimum, harassment through electronic means. The OIG also found that the engineer's use of his cps.edu email account to send threatening and harassing emails violated CPS' Staff Acceptable Use Policy.

While this matter was under investigation, the engineer pleaded guilty to two separate, unrelated charges of reckless conduct, including a charge relating to threatening to kill a police officer. The OIG notified law enforcement about its investigation and communicated with law enforcement regarding the engineer's threats and other alleged criminal conduct.

The OIG recommended that the engineer be personally debarred and prohibited from working with CPS in any capacity, either as a CPS employee or as an employee of a CPS vendor. The Board placed the engineer on an internal Do Not Hire list.

» *Civil No Contact Order Entered Against Elementary School Teacher (24-00232)*

A Circuit Court of Cook County judge entered a Civil No Contact Order against an elementary school teacher after finding that it was more likely than not that the teacher engaged in non-consensual sexual activity with her then 21-year-old neighbor while the teacher and the neighbor were intoxicated. The neighbor was not affiliated with CPS.



The neighbor's parents reported the incident to the Chicago Police Department. The CPD conducted a brief investigation, which was suspended with no charges filed against the teacher.

The OIG determined not to investigate the matter further because the off-duty incident was investigated by the CPD and was the subject of a civil court proceeding in which the court made findings of fact after the parties testified under oath. The OIG reported the matter to the CPS Law Department for informational purposes so that CPS could make any decisions it deemed appropriate regarding the teacher's employment. CPS' Law Department advised the OIG that the matter was referred to the Office of Administrative Hearings, and that no disciplinary action was issued against the teacher.

» *Former Substitute Teacher Sentenced in Three Separate Criminal Cases to a Collective Period of 10 Years and Six Months in Prison (19-02365)*

A former substitute teacher was arrested and charged with sexually assaulting and abusing three children, including one of his CPS students, between 2003 and 2014. In September 2023, the former employee pled guilty to three sexual abuse charges, including a charge relating to the sexual abuse of the CPS student in 2003.

The former employee's CPS employment was terminated in 2011 and a Do Not Hire designation was placed in his personnel file at that time after a CPS Law Department investigation into an unrelated matter.

Police records obtained by the OIG showed that the former employee was arrested in October 2019 and was then charged in the Circuit Court of Cook County with five felony counts of sexual assault and sexual abuse. In December 2019, these charges were superseded by three indictments in three separate criminal cases bringing additional charges of sexual assault and sexual abuse.

In the first case, the former employee was charged with five felony counts of sexual assault and sexual abuse relating to an incident involving a CPS high school student in 2003. In September 2023, the former employee pled guilty to one count of Aggravated Criminal Sexual Abuse of a Victim Under Age 18, Position of Trust, a Class 1 Felony. He was sentenced to three years and six months in prison, and required to register as a sex offender, along with other conditions. Additional charges of Criminal Sexual Assault/Force, Criminal Sexual Assault/Can't Consent, and two counts of Criminal Sexual Assault of a Victim Age 13-17, were dropped.

The second case against the former employee included five counts of sexual assault and sexual abuse of a family member from 2008 through 2013, when the family member was between the ages of nine and 14. In September 2023, the former employee pled guilty to one count of Predatory Criminal Sexual Assault, a Class X Felony, and was sentenced to seven years of confinement to run consecutive to his sentence in the first case, along with



a period of mandatory supervisory release and other conditions. Three charges of Criminal Sexual Assault of a Victim Age 13-17, were dropped.

In the third case, the former employee was charged with three sexual abuse charges relating to abuse of a second family member from 2007 through 2011, while the family member was between the ages of nine and 13. In September 2023, the former employee pled guilty to one count of Aggravated Criminal Sexual Abuse of a Victim under 13, a Class 2 Felony. He was sentenced to a period of confinement of three years and six months, to run concurrent with his sentences in the first two cases, as well as supervised release and other conditions. The remaining two charges were dropped.

Altogether, the three cases resulted in the former employee being sentenced to a period of 10 years and six months in prison, along with one year of supervised release, registration as a sex offender, and other conditions.

» *Former Elementary School SECA Pled Guilty to Carrying or Possessing a Firearm in Public and Resisting a Peace Officer (23-01034)*

A former elementary school SECA was arrested after an altercation in a gas station parking lot and charged in the Circuit Court of Cook County with Aggravated Unlawful Use of a Weapon and Resisting a Peace Officer and causing injury, both Class 4 felonies. As part of a plea agreement, the SECA pled guilty to amended charges of Carrying or Possessing a Firearm in Public and Resisting a Peace Officer, both Class A misdemeanors, and was sentenced to two years of probation and 50 hours of community service.

The SECA voluntarily resigned his CPS employment in December 2023. A Do Not Hire designation was subsequently placed in the SECA's personnel file.

» *Former Crossing Guard and Charter School Employee Charged with Six Counts of Battery Through Physical Contact (23-00251)*

A former CPS crossing guard and charter school employee was alleged to have struck several students with a ruler at the charter school where he was employed as a recess monitor in January 2023.

In February 2023, the crossing guard was charged in the Circuit Court of Cook County with six counts of Battery through physical contact, a Class A misdemeanor. The crossing guard was released on bond. In March 2023, the crossing guard failed to appear for a status hearing and forfeited his bond. A warrant was then issued for his arrest. In May 2023, while the crossing guard's arrest warrant was outstanding, a judgment on bond forfeiture was entered against him in the case.

As a result of the incident, the charter school put the individual on administrative leave and then terminated his employment. Later, in February 2023, the crossing guard's employment



with CPS was suspended and later terminated, and a Do Not Hire designation was placed in his personnel file.

» *Former High School Security Officer Pled Guilty to Carrying or Possessing a Firearm in Public and Driving Under the Influence (21-00602)*

A former high school security officer was charged in the Circuit Court of Cook County with Aggravated Unlawful Use of a Weapon, a Class 4 felony, Failure to Reduce Speed, a petty offense, Driving Under the Influence, a Class A misdemeanor, and Possession of Cannabis with Intent to Deliver, a Class 3 felony.

In November 2021 the cannabis charge was dismissed. In February 2023 the aggravated unlawful use of a weapon charge was amended down to a misdemeanor of Carrying or Possessing a Firearm in Public, and the employee pled guilty to the amended charge as well as the DUI charge. The employee was sentenced to two years of probation and issued fines over \$1,400.

The employee voluntarily left his CPS employment in June 2022, and a Do Not Hire designation was placed in his personnel file.



## G. Employee Residency Matters

Board policy requires employees to live within the City of Chicago absent approved exemptions. Per the Board's residency policy, an employee who lies about his or her address in conjunction with a residency violation is subject to immediate dismissal. See Board Report 18-0627-P04.

» *Elementary School Technology Coordinator Admitted to Living in Sauk Village Since 2018 (22-000727)*

An OIG investigation found that a technology coordinator at an elementary school violated the CPS residency policy by residing in Sauk Village, Illinois, since 2018. Property records, utility records, voter registration information, and Secretary of State records tied the technology coordinator and her husband to the Sauk Village residence but not to the Chicago property reported to CPS.

During her interview with the OIG, the technology coordinator initially claimed that she lived at the Chicago property before admitting that she had lived in Sauk Village since 2018. In accordance with the residency policy, the OIG recommended her termination and that a Do Not Hire designation be placed in her personnel file. The Board subsequently terminated the technology coordinator's employment and gave her a Do Not Hire designation.

» *Elementary School Teacher Admitted to Living in Batavia (23-000090)*

An OIG investigation found that an elementary school teacher violated CPS' residency policy by residing in Batavia, Illinois, since August 2022 while falsely reporting a Chicago address to CPS. During her interview with the OIG, the teacher admitted to living in Batavia with her children since August 2022 and that she intentionally did not update her CPS address-of-record after moving to Batavia because she did not want CPS to know that she lived in the suburbs.

In addition, property and tax records demonstrated that the teacher owned her Batavia residence since August 2022. Driver's license and voter registration records further showed that the teacher resided in Batavia. The evidence established that the teacher intentionally failed to update her CPS address-of-record to conceal the fact that she resided in Batavia. In accordance with the residency policy, the OIG recommended the termination of the teacher's employment and that a Do Not Hire designation be placed in her personnel file. The teacher resigned and the Board placed a Do Not Hire designation in her personnel file.

» *High School Teacher Lived in Arlington Heights Since 2013 (22-000744)*

A high school teacher violated the CPS residency policy by residing in Arlington Heights, Illinois, from 2013 until her resignation from CPS during the OIG's investigation in 2022. During her interview with the OIG, the teacher admitted that she slept at her Arlington



Heights home about half the time, had not lived at her CPS address-of-record since June 2021, and that she lived and worked from her Arlington Heights home during remote learning. Property records, utility records, voter registration records, and Illinois Secretary of State records further established that the teacher lived in Arlington Heights in a home she's owned since 2003.

The teacher intentionally misrepresented her actual residence with the intent to avoid CPS' residency requirements by intentionally failing to disclose that she resided in Arlington Heights and/or by reporting to CPS that she lived at Chicago addresses which were not her actual residence. In accordance with the residency policy, the OIG recommended that the teacher receive a Do Not Hire designation and would have recommended her immediate termination had she not already resigned from CPS. The Board followed the OIG's recommendation.

» *High School Teacher Lived in River Grove Since 2004 (22-000743)*

A high school teacher violated the CPS residency policy by residing in River Grove, Illinois, since approximately 2004. Property records, bank records, and utility records established that the teacher lived in River Grove. The teacher intentionally misrepresented her actual residence to avoid CPS' residency policy by failing to report that she resided in River Grove, and/or by reporting to CPS that she lived at Chicago addresses which were not her actual residence. In accordance with the residency policy, the OIG recommended the immediate termination of the teacher's employment and that a Do Not Hire designation be placed in her personnel file. The teacher resigned after CPS initiated termination proceedings against her and received a Do Not Hire designation.

» *Elementary School Teacher Admitted to Living in Highland Park (22-000737)*

A former elementary school teacher violated the CPS residency policy by residing in Highland Park, Illinois, from when she was hired by CPS in 2021 until her resignation during the OIG's investigation in 2023. The teacher intentionally misrepresented her actual residence on personnel forms she completed when she was hired, including her Sworn Residency Statement, Employee Data Form, and Fingerprinting Background Investigation Authorization & Release Form.

During her interview with the OIG, the teacher admitted that she has lived at her Highland Park home with her family since 2012. Utility records, Illinois voter registration records, and Illinois Secretary of State records further established that the teacher lived in Highland Park. The OIG recommended that the teacher receive a Do Not Hire designation and would have recommended the termination of her employment had she not already resigned from CPS. The Board followed the OIG's recommendation.





» *Elementary School Teacher Lived in Westchester and then Darien from 2001 to 2023 (22-001368)*

An elementary school teacher violated the CPS residency policy by residing in Westchester, Illinois, and then in Darien, Illinois, from 2001 until his resignation during the OIG's investigation in 2023. During his OIG interview, the teacher admitted that he lived with his spouse in Westchester, Illinois, from 2001 to 2013, when they moved to Darien, Illinois. The teacher also admitted that he purposely failed to report his suburban address to CPS so that the District would not know his true residence. OIG surveillances further confirmed that the teacher lived in Darien. The OIG recommended that a Do Not Hire designation be placed in the teacher's personnel file and would have recommended the termination of his employment had he not already resigned from CPS. The Board followed the OIG's recommendation.

» *Elementary School Teacher Admitted to Living in Niles since 2010 (22-00956)*

An OIG investigation found that a former elementary school teacher violated the CPS residency policy by residing in Niles, Illinois, since at least 2010. The teacher resigned from CPS shortly after the OIG interviewed her in this matter.

During their interview with the OIG, the teacher admitted to living in Niles since 2010 and to reporting the residences of her family members as her CPS addresses of record to evade the CPS residency requirement. Property records, Illinois Secretary of State records, utility records, and voter registration records, as well as numerous surveillances, further confirmed that the teacher lived in Niles.

The OIG recommended that the teacher receive a Do Not Hire designation in her personnel file and would have recommended the termination of her employment had she not already resigned from CPS. The Board followed the OIG's recommendation.

» *Elementary School Teacher Lived in Morton Grove Since 2008 (22-01208)*

An elementary school teacher violated the CPS residency policy by residing in Morton Grove, Illinois, since 2008. During her interview with the OIG, the teacher claimed that she lived with her parents in Chicago since separating from her spouse in 2008, while her spouse lived in Morton Grove with their children. However, OIG surveillances, as well as property records, Morton Grove Police Department records, Skokie-Morton Grove School District records, and Illinois Secretary of State records showed that the teacher resided in Morton Grove. The OIG recommended that the teacher's employment be terminated and that she receive a Do Not Hire designation in her personnel file. The Board pursued termination by filing dismissal charges and the teacher subsequently resigned. The Board placed a Do Not Hire designation in her personnel file.



» *High School Special Education Teacher Admitted to Living in Highland Park Since 2015 (22-000742)*

An OIG investigation found that a high school special education teacher violated the CPS residency policy by residing in Highland Park, Illinois. During her interview with the OIG, the teacher admitted that she lived in Highland Park with her family since 2015. Lake County Recorder of Deeds records, City of Highland Park records, and Illinois Secretary of State records further established that the teacher lived in Highland Park.

The OIG found that the teacher intentionally misrepresented her actual residence by reporting a colleague's Chicago address as her own to CPS. The teacher told the OIG that she attempted to find employment outside of Chicago and continued to work for CPS when she was unable to do so.

After her OIG interview, the teacher submitted her resignation from CPS to be effective at a future date. The OIG recommended that the teacher's employment be terminated and she receive a Do Not Hire designation in her personnel file. The Board subsequently placed a Do Not Hire designation in her personnel file.

» *High School Teacher Lived in Northbrook (23-000338)*

A high school teacher violated the CPS residency policy by residing in Northbrook, Illinois, since 2012. During his OIG interview, the teacher told the OIG that he did not live at the Northbrook home he owned and that it was vacant, but then admitted to spending a few nights a week there. Property records, Illinois Secretary of State records, Village of Northbrook records, and voter registration records established that the teacher lived in Northbrook. The OIG recommended that the teacher's employment be immediately terminated and that he receive a Do Not Hire designation in his personnel file. The Board subsequently filed dismissal charges and notified the OIG that a termination hearing is pending with the Illinois State Board of Education.

» *Elementary School Teacher Admitted to Living in Lynwood Since 2022 (22-000736)*

An OIG investigation found that an elementary school teacher lived in Lynwood, Illinois, in violation of the CPS residency policy from 2022 until her resignation during the OIG's investigation in 2024. During her interview with the OIG, the teacher admitted that she moved out of Chicago in 2022. Property records, Illinois Secretary of State records, Village of Lynwood records, and utility records also showed that the teacher lived in Lynwood. The OIG recommended that the teacher receive a Do Not Hire designation in her personnel file and would have recommended the termination of her employment had she not already resigned from CPS. The Board subsequently placed a Do Not Hire designation in her personnel file.



» *Data Specialist Admitted to Living in Berwyn Since the Start of the COVID-19 Pandemic (22-000726)*

An OIG investigation found that an Early Childhood Data Specialist lived in Berwyn, Illinois, in violation of CPS' residency policy since at least March 2020. During her OIG interview, the employee admitted to living at her Berwyn residence since the start of the pandemic. City of Berwyn records, Cook County Recorder of Deeds records, and Illinois Secretary of State records further showed that the employee lived in Berwyn. The OIG recommended that her employment be terminated and that a Do Not Hire designation be placed in her personnel file, recommendations the Board followed.



## H. Misuse of CPS Resources and Other Misconduct

### » *High School Administrator Engaged in Unapproved Secondary Employment (22-01697)*

An OIG investigation found that during the 2021-22 and 2022-23 school years a high school administrator held secondary employment without approval from her supervisor as required by the Code of Ethics; however, the OIG determined that the administrator's secondary employment did not conflict with the duties or demands of her CPS employment.

After the administrator was interviewed by the OIG, she requested and received approval from her supervisor for her secondary employment. She then filed her secondary employment forms with the CPS Ethics Advisor and came into compliance with the Code of Ethics. Accordingly, the OIG made no further recommendations. The Board issued the administrator a one-day suspension.

### » *Elementary School Teacher Provided Misleading Information to Their Child's School (22-000332)*

An OIG investigation found that a special education teacher whose own child attends a CPS elementary school and is a diverse learner provided her child's school with a document containing misleadingly altered excerpts of reports from the child's medical appointments. In some instances, the misleading alterations made it seem as though the child's health condition was more severe than what the original reports indicated. During the investigation, the OIG also obtained records showing that the teacher improperly accessed her child's records in CPS' database system for its diverse learner population, although the records did not show that the teacher tampered with any of the records. The OIG recommended that the teacher receive appropriate discipline and training on the appropriate use of the records database at issue. The Board subsequently gave the teacher a Level Two Performance Improvement Plan and referred her for training. Completion of the training remains pending.

### » *Former CPS Employee's Job Title and Pay Rate was Misclassified for Several Years, Employee Worked from Home Without Authorization (22-01976)*

For the past several years, CPS failed to properly title or pay an elementary school principal who was transferred to a non-school-based administrative position pursuant to a settlement agreement with CPS.

That agreement, which was executed to resolve a dispute over the principal's job performance, specified that in exchange for resigning from her school in July 2016 and waiving claims against CPS, the principal would be transferred to an administrative position with a commensurate salary for one calendar year. During that time the principal could apply for other CPS principalships or positions, but if she failed to be hired, the administrative job would terminate on June 30, 2017.



CPS personnel records and emails showed that despite these terms, in July 2016 the principal was instead immediately approved for a citywide principal job title and salary and began performing work for a CPS administrative department without ever formally being assigned to it or paid out of its budget. Then, after the position expired in June 2017, the principal continued working and being paid under her citywide principal title even though CPS' Law Department advised another high-ranking CPS official that the principal should be released "immediately." The principal nevertheless continued to work for CPS under this arrangement until March 2024, when she was terminated during the OIG's investigation.

The principal's termination came almost eight years after she was transferred from her school and seven years after her administrative position should have ended. During that time her CPS salary rose from approximately \$124,000 to \$165,000, almost \$20,000 more than any other employee in the principal's department—including the department head.

Ultimately, however, the OIG found insufficient evidence to determine specifically who was responsible for the principal's overpayment. Numerous high-level CPS employees appeared to have reviewed and approved the principal's transfer in July 2016 and initially "managed" the principal's work, but all these individuals have long-since left CPS. Those whom the OIG interviewed claimed to have little memory of the principal or the circumstances of her transfer. Moreover, the current head of the principal's administrative department did not appear to have been involved in the principal's initial assignment to that department or her continued employment as a "principal."

Whatever the case may have been, the OIG found that while the principal did appear to do some work for the administrative department, she seemingly fell through the cracks of CPS' management and for years received little supervision. Evidence showed that although the principal began working for the department in CPS' downtown offices shortly after she was transferred, by July 2017 the principal had been reassigned—by herself and without any other employees from the department—to a CPS office on the southside.

This reassignment appears to have severely limited how much supervision and management the principal received for the rest of her time with CPS. The administrative department's current head, for example, admitted to the OIG that because the principal was assigned to the southside office, she could not actually account for the principal's whereabouts during the workday. The department head also said she had no real measure of the quantity or quality of the principal's work. Similarly, the OIG found that the principal stopped receiving any annual performance evaluations and that, for a time, nobody managed her time and attendance.

Due to this lack of supervision, the OIG found that the principal began working from home without permission years before the COVID-19 pandemic. Initially, the principal swiped in for work each day at an elementary school by her home rather than at the southside CPS office. Eventually the principal did begin swiping in at that office, but OIG surveillance and security camera footage from the building showed that the principal would then immediately leave



the building to return home. When the OIG finally interviewed the principal about her work location, she initially lied to investigators before admitting that she had worked from home for years.

After the OIG informed the principal's department head of her unapproved remote work, the department head said she could no longer trust that the principal was working a full day. Moreover, the OIG observed during its surveillance that the principal ran personal errands during work hours. Ultimately, however, the OIG did not obtain evidence establishing that the principal had been engaged in a ghost payrolling scheme involving others, nor did it show that she was working another job during her CPS workday. Emails and other evidence showed that the principal did perform at least some work, and the department head told the OIG that she had otherwise not had problems with the principal's job performance.

CPS honorably terminated the principal's employment in March 2024 during this investigation. Had the principal still been employed, the OIG would have recommended that she be reassigned to an appropriate job title and that her pay be adjusted accordingly. The OIG also would have recommended that the principal receive appropriate discipline for working from home without permission prior to the COVID-19 pandemic, discipline the principal should receive if she is ever rehired by CPS. In April 2024, CPS rehired the principal as a teacher. According to CPS, the principal received a level three performance improvement plan after she was rehired.



# Family Income Information

Fraud, Abuse and Bad Data



## A. Family Income Information: Fraud, Abuse and Bad Data

Every CPS family should be familiar with the CPS Family Income Information Form (FIIF), which parents are asked to fill out annually to help determine certain resources for their schools and fee waivers for children whose households meet “Free and Reduced Meal” (FRM) income eligibility.

The FIIFs, which sometimes are colloquially called “school lunch forms,” require parents to report their household size and income at the beginning of each school year and are typically processed by school clerks.

Over more than a decade, the OIG has investigated and reported on several ways in which income forms have been misused or FRM designations have been fraudulent. For example:

- The OIG has found that scores of CPS employees or their spouses falsified their CPS income forms by understating or omitting CPS salaries or inflating the size of their households, resulting in the misidentification of their children as FRM eligible. This included principals and assistant principals with six-figure CPS salaries.
- In one case, a clerk falsified the meal application forms of multiple parents at her school to improperly qualify students for free or reduced-price meals. The clerk also shredded a form submitted by a parent and instructed the parent to make out a new one that qualified for FRM.
- In OIG cases worked with other oversight agencies, households of CPS employees were found to have fraudulently received public aid benefits after employees or their partners omitted CPS salaries from their state applications, leading to their children’s automatic but unwarranted designations as FRM-eligible.

Since 2015, all CPS students have received free school meals regardless of income, but abuse of the form has continued because student FRM status still impacts schools and families. The District still uses FRM eligibility to make school funding allocations, staffing decisions and, at many individual schools, fee waiver determinations, as discussed in more detail below.

In Fiscal Year 2024, the OIG’s Performance Analysis Unit and General Investigations Unit each reported on cases involving FIIFs.

In the first case discussed below (23-01029), the OIG’s Performance Analysis Unit evaluated the overall procedures and practices surrounding the FIIF that made it vulnerable to abuses over the years and found signs of FIIF fraud this past school year among possibly hundreds of CPS employees. This performance review laid out a series of recommendations, including that CPS stop linking school funding to unverified FIIFs and reform its fee waiver process. CPS officials have since agreed to do just that next school year.





In the second case (20-01034), the OIG General Investigations Unit drilled down on one particular school and its questionable FIIF practices. The OIG found that two clerks incorrectly labeled at least 88 students as FRM eligible, resulting in increased funding for their school.

## B. Performance Review: Family Income Information Forms

### Overview

CPS is using an unreliable, unverified, and unaudited income information form to identify low-income students—a designation that brings students and their schools extra benefits—even though the form has been repeatedly tied to fraud.

Furthermore, fraud linked to Free and Reduced Meal (FRM) eligibility appears to continue to this day, despite the fact that all CPS students currently receive free school meals, regardless of income. An analysis by the OIG's Performance Analysis Unit indicated that hundreds of CPS employees with children in CPS may have omitted or understated their CPS incomes on 2023-24 Family Income Information Forms (FIIFs)<sup>8</sup> that all CPS parents are asked to fill out annually to establish their child's FRM status (23-01029). This analysis also raised red flags as to whether some CPS employees might have children with unwarranted FRM-eligible designations due to the employees' improper receipt of public aid benefits.

*Why would anyone want to fudge FRM information if free or reduced-price meals are no longer tied to them? **Because FRM eligibility still carries other important benefits.***

For starters, although CPS no longer receives funding based on FRM status, CPS uses FRM designations to decide how to *distribute* extra funding and extra staff to schools. The CPS budget model unveiled in 2024-25 maintained FRM as a significant part of each school's federal Title 1 allocation and used FRM as one twelfth of its Opportunity Index score, which is used to allocate per-pupil discretionary funding, as well as additional teachers and counselors to schools. (For details see 20-01034 in Section 3(B) below.)

The FIIF's tie to individual school funding is described twice on the form itself—in the signature box at the bottom and at the very top of the form, as shown in **PAU-Figure 1** below.

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<sup>8</sup> More than a decade ago, CPS families filled out Free and Reduced Meal applications to determine if their children could receive free or reduced-price school meals. Since 2014-15, all CPS students have received free meals under the Community Eligibility Provision (CEP) of the National School Lunch Program. With this change, FRM designations no longer affected certain CPS revenue and CPS replaced the FRM application with the Family Income Information Form, which sought similar income information and used the same income cutoffs to determine a student's FRM eligibility. FRM eligibility was then used as a proxy for low-income status in other contexts.



**PAU-Figure 1: Top of CPS Family Income Information Form 2024-25**



The purpose of this form is for CPS to obtain information about families' income to determine school funding. CPS and your school may receive additional funding based on the number of low-income families enrolled. Please complete this form and return it to the school's main office

Parents—Please return form to school by October 30, 2024.  
Schools—Please enter into ODA by November 20, 2024.

*please print or type:*

STUDENT LAST NAME		STUDENT FIRST NAME			STUDENT MIDDLE NAME	
SCHOOL NAME			STUDENT ID	DOES YOUR FAMILY HAVE INTERNET SERVICES AT HOME? <input type="checkbox"/> YES <input type="checkbox"/> NO		
PART 1: Household Information — List all members of your household living with you. <i>*Foster Children (legal responsibility of welfare agency or court)</i>					PART 2: SNAP/TANF number of any member of your household (go to part 6)	
FOSTER CHILD?	CPS STUDENT?	ALL HOUSEHOLD MEMBER NAMES			DATE OF BIRTH	DHS SNAP OR TANF CASE NUMBER (LAST 9 DIGITS)
		Last	First	M.I.		
<input type="checkbox"/>	<input type="checkbox"/>					
<input type="checkbox"/>	<input type="checkbox"/>					

In addition, on an individual level, an FRM designation can yield parents a waiver of student fees that can include, depending on the school: a school activity fee, a technology fee, a consumable fee, a class fee, a band instrument rental fee, a participation fee per sport played, a graduation fee, college admission testing fees, and college application fees. These fees can amount to hundreds of dollars a year per student, especially at graduation time or during college application season.

Officials at one CPS selective-enrollment high school told the OIG that every November and December, dozens of parents ask to revise their FIIFs in apparent attempts to qualify their children as FRM-eligible so their college application fees (ranging from \$25, to typically around \$75, but up to \$125) can be waived.

“I think [parents] just submit it over and over until they get it right,” said one administrator at this high school.

Even parents of apparent affluence have walked in seeking waivers at this school. Said another administrator: “We’ve even had people come to school and they are driving a Mercedes and asking for fee waivers.”

How else is an FRM indicator used? Nationally, FRM eligibility has become a proxy for low-income status, and low-income students need to be identified as such during certain assessment tests under federal law.

In addition, Illinois schools and districts publicly report their percentages of low-income students based on FRM standards and may cite these statistics in seeking grants.

In the wake of the OIG’s report, CPS officials said they are planning to drop the FRM indicator from the District’s formulas for distributing funds to schools in School Year 2025-



26. In addition, a special committee is crafting new guidelines involving school fees and fee waivers, as discussed in more detail below.

### Warning Signs of Current Employee FIIF Fraud

Despite years of OIG reports on improper and inaccurate FRM designations, a PAU analysis indicated that employee FIIF fraud appeared to be active once again in School Year 2023-24. As illustrated in **PAU-Chart 1**, of all 880 CPS employees with CPS students designated as FRM-eligible due to a 2023-24 Family Income Information Form, 619 (about 70%) appeared to have at least one child who did not warrant such a designation, based solely on an OIG analysis of their CPS salaries and CPS-declared household sizes or dependents.

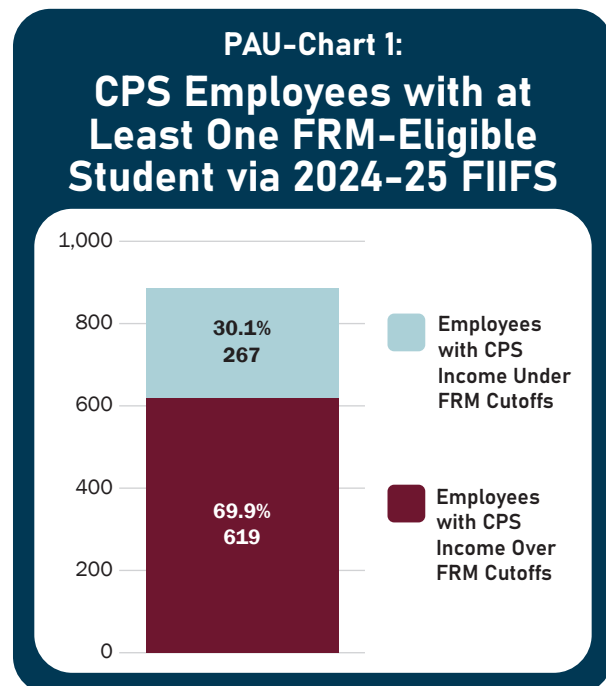
So, close to three out of four CPS employees who used an FIIF to obtain a FRM designation for their child appeared to have a CPS income and household size<sup>9</sup> that did not warrant such a designation, the OIG analysis indicated.

These 619 CPS employees had 764 children designated as FRM eligible based on FIIFs, even though their annual CPS salaries were higher than the FRM income cutoff for their household size, the OIG calculated.

In fact, 134 of the 619 employees with dubious FIIFs had CPS salaries of at least \$100,000 in 2023-24.

Of course, this analysis is based purely on CPS salary and household size information.

Some students identified this way could have been legitimately FRM-eligible due to their status as foster children or because they were living with an estranged parent who met FRM income standards. Or, they could have been flagged due to misinterpretations of their FIIF entries, or accidental errors on their FIIFs.



Note: Six employees had students in both categories and were counted in each category.

Sources: OIG Analysis of CPS Databases and FRM Income Cutoffs from USDA. All Data from SY 2023-24.

<sup>9</sup> The OIG analysis used 2023-24 employee salaries plus either the household size listed in the CPS Online Data Acquisition system or, if that was not available, the number of employee dependents listed in PeopleSoft plus one (for the employee) as the most readily available proxy for household size. These numbers were then compared to the income and household size cutoffs in USDA Free and Reduced Meal guidelines.

On the other hand, this analysis was unable to factor in the incomes of employee spouses or partners. This second income could have pushed even more CPS employees well beyond the FRM income limits for their size household.

Furthermore, this type of fraud is certainly not limited to CPS employees. Districtwide, more than 250,000 CPS students are FRM eligible, with roughly 54,200 of them due to a FIIF—and the vast majority of those students are not the children of CPS employees. The OIG has talked to non-CPS employee parents who admitted understating their income on FIIFs, however, the OIG’s analysis was unable to assess the systemwide extent of possible FIIF fraud by such parents because their salaries are not easily accessible to the OIG.

The OIG analysis focused on potential fraud based on FIIF forms, rather than direct certifications via the Illinois State Board of Education, because direct certification is automatically triggered by enrollment in any of three public aid programs with mostly different cutoffs than those used by the USDA for FRM eligibility or by foster child status. However, an OIG analysis of directly certified students using FRM cutoffs indicated that a significant number appeared to have parents with substantial CPS salaries, so the OIG will continue to work with other oversight agencies on such cases.

### **No Proof of Income Required**

Despite the benefits that FRM designations can bring, CPS makes no attempt to audit or verify the income information that parents place on their Family Income Information Forms. FIIFs ask parents if they are interested in having their child’s instructional fees waived, but neither the FIIF nor a template CPS Fee Waiver Form asks for any proof of income—such as a pay stub, a W2 form, a letter from an employer or a benefit statement—to verify that the family’s household income falls within FRM-eligibility limits.

Furthermore, CPS is the only district among the nation’s five largest that does not offer parents the option of filling out this form online.

As a result, handwritten information on paper CPS forms can be illegible, and FIIFs have been accepted with important fields of information left blank (see 20-01034). The name of the CPS employee who enters an FRM determination onto the FIIF after accepting missing or illegible information can be easily obscured because only that employee’s handwritten signature is required—not their printed name, job title or CPS identification number. Some employees only put their initials on the form.

Numerous CPS officials told the OIG that no one at CPS has “ownership” of the FIIF, even though its entries have been the subject of repeated substantiated OIG cases for more than a decade. The Fee Waiver form also does not have what CPS calls an “owner,” or a person who oversees the form, the OIG was told.

This lack of accountability involving the FIIF and the fee waiver form further increases their vulnerability to fraud.



CPS' failure to audit the FIIF is especially problematic in tight budget times, when incorrect or falsified FIIFs could possibly lead to the distribution of unwarranted funds to some schools and less funding to other, needier schools.

### Inconsistent Waiver Practices

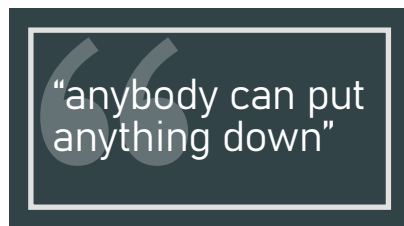
Fee waivers are frequently tied to a child's FRM status, which is often based on a Family Income Information Form. FIIFs not only ask parents about household size and income, they also inquire whether parents want to apply for a fee waiver, as indicated in **PAU-Figure 2**.

Yet fee waiver practices vary from school to school.

One administrator at a CPS school that is about 40 percent low income said she believed schools were not allowed to collect any proof of income from

parents seeking fee waivers. But at another school that is close to 90 percent low income, one employee said the school recognizes that "anybody can put anything down" on a FIIF because CPS does not verify the information on such forms. As a result, this school asks for proof of income before granting waivers.

And although CPS offers schools the option of using a CPS fee waiver template to gather eligibility information from parents, CPS employees at three different high schools said they had never seen such a template. The template is not that easy to find. It was one of about 15 links buried in a Memorandum on Establishing, Collecting and Waiving School Fees that CPS says was sent to principals in September 2023.



More CPS guidance on fees and fee waivers is needed, some administrators said.

"I would like a policy around fees," one principal said. "We have families who have the means and just don't pay because there's no way we can hold them accountable."

### Discussion

The possibility that roughly 70 percent of all CPS employees who filled out Family Income Information Forms to obtain low-income status for their children did so fraudulently is truly concerning.

Yes, some of these employees' children could be legitimately FRM eligible. But it is also possible that if employee spousal incomes were added into FIIF calculations, far more than

### PAU-Figure 2: Fee Waiver Portion of FIIF

#### PART 5: Opt in for information about other benefits.

- YES!** I am interested in applying for a waiver of instructional fees.
- YES!** I am interested in applying for the Supplemental Nutrition Assistance Program (SNAP) and/or the Medicaid Program. Or call 773-553-5437
- YES!** This student/these students have a parent who is a veteran or active military member. *Students with a parent who is a veteran or active military may qualify for a fee waiver.*

70 percent of employees would have children with questionable FRM designations based on FIIFs.

In addition, if CPS employees are falsifying FIIFs, some degree of the general population of parents probably is, too.

On top of all this, income form falsifications have gone on for more than a decade, as proven in past OIG cases, and yet CPS has done nothing to ensure the accuracy of FIIFs. Instead, the District has continued to use them without any oversight.

Clearly, a swift correction of this situation is warranted. This is particularly true in tight budget times, when it is possible that one school's unjustified funds based on improper FIIFs could result in a needier school's loss of funds based on FIIF calculations.

## Recommendations

Whatever solution CPS chooses, the OIG recommends the following:

- CPS should stop distributing funds based on FRM designations using unverified FIIFs that let parents write down or omit any income figures they want, without any auditing.
- If CPS chooses to keep the FIIF, a random sampling should be audited annually for proof of income, and those identified as providing false information or who refuse to provide proof of income should be barred from receiving any fee waivers during their children's time in CPS and eliminated from the FRM-eligible rolls. For deterrent purposes, the form should warn applicants of these penalties.
- CPS should make income forms optional and available online. If the four other largest U.S. school districts can use online forms, CPS should be able to do so as well. Making the forms optional as well as online will result in fewer forms; easier forms to process; forms less vulnerable to inaccuracy, misinterpretation or manipulation; and will require less manpower. Hopefully, more focus can be placed on auditing.
- If CPS drops the FIIFs, it should move to an alternate way of identifying low-income students for budgeting and test-taking purposes. For per-school funding, CPS could create a low-income indicator tied to census tracts—something the CPS “tier” system now heavily relies on during the selective-enrollment application process. During assessment tests, CPS could link the indicator to those who are directly certified (recipients of TANF, SNAP, and Medicaid benefits, and foster children), categorically FRM-eligible (homeless, migrant or runaway students) and those granted fee waivers after proof of FRM-eligible income or the explanation of an extenuating circumstance is provided.
- CPS should require that fee waiver applicants provide proof of income and give schools guidance on what they can do to try to recover unpaid fees. Some schools



are becoming increasingly dependent on their fee income and need help in this area. Unnecessary loss of school income could become especially critical if CPS faces increased financial pressures.

- CPS should add accountability to the entire process by making a department responsible for managing and overseeing the FIIF and the fee waiver form; by listing on these forms, as a deterrent, expanded potential penalties for false information; by requiring CPS employees who record FRM designations based on these forms to clearly list their names, job titles and CPS ID numbers on the forms; and by requiring households to list on their FIIFs any CPS employee in their household, as well as their CPS ID numbers.

### **CPS Response**

CPS officials said they agree with the OIG’s findings and are planning on dropping FRM status from any Fiscal Year 2026 formula involving the distribution of funds to schools, as the OIG recommended.

“As a district, we are ready to do something else, given a lot of the challenges you outlined in your report,” one CPS official told the OIG.

CPS is exploring other options of accounting for low-income students in releasing funds to schools. One possibility for budget purposes is creating a low-income identifier from census data.

However, currently, about a quarter of CPS’ low-income students are identified as such via the Family Income Information Form, so CPS will keep the FIIF for at least another year as it may be needed to identify low-income students during assessment tests, officials said. In addition, schools currently are using the FRM status derived from the FIIF for a variety of purposes, including granting fee waivers.

CPS officials are not yet sure if the FIIF will be mandatory, optional or offered electronically next school year. However, someone—or some department—will be charged with overseeing this form, one key CPS official said.

Following the OIG’s June 2024 performance review, CPS formed a Student Fee Committee that will be studying the OIG’s recommendations concerning student fees and fee waivers. It will consider whether to require proof of income from all fee waiver applicants, or just a random sample of them, officials told the OIG.

Providing key input to the committee is the CPS Office of Internal Audit and Advisory Services, which conducted a recent audit on school fees and recommended certain controls.

The Student Fee Committee is expected to produce student fee policy and protocol recommendations by spring 2025 for implementation in School Year 2025-26. Administrators and staff will be trained on the changes next summer, officials said.



### **C. Investigation: Dozens of Improper Eligibility Determinations at One School**

An OIG investigation found that an elementary school clerk (Clerk 1) incorrectly completed the eligibility section of students' Family Income Information Forms (FIIFs) during the 2018-19 and 2019-20 school years (20-01034). Specifically, Clerk 1 used the FIIFs to designate the students as "eligible" for free and reduced-priced meals (FRM) on the forms even though their reported household income on the forms exceeded the income thresholds for the National School Lunch Program (NSLP). By improperly marking students FRM-eligible, Clerk 1 drove additional, unwarranted CPS funding to her school.

The OIG also found that another clerk at the school (Clerk 2) contributed to Clerk 1's misconduct by failing to correct Clerk 1's improper eligibility determinations and/or approving forms that had been improperly designated as FRM eligible.

It should be noted that Clerks 1 and 2 were both also the subjects of OIG Case Number 22-00318, a separate investigation involving a payroll fraud/theft scheme at their school which was previously summarized in the OIG's Fiscal Year 2023 Annual Report.

#### **Even with District-Wide Free Meals, FRM-Eligibility Is Still a Factor Used by CPS to Determine Funding Allocations to Schools**

Historically, data on student FRM eligibility served two purposes: (1) to determine which students received free and reduced-priced meals and, in turn, how much federal reimbursement CPS received for school meals; and (2) as a "poverty metric" for determining how CPS allocated federal and state funding it received to its individual schools.

Since 2015, however, all CPS students have received free school meals regardless of income under the NSLP's Community Eligibility Provision. As such, CPS' receipt of NSLP funding no longer depends on the number of FRM-eligible students in the District.

Similarly, in 2017 Illinois implemented a new school funding formula, known as evidence-based funding (EBF), for public schools across the state. Under Illinois' old school funding formula, CPS was required to distribute certain state funds it received each year to schools based on the number of FRM-eligible students at those schools. The new EBF formula, however, no longer requires CPS to use FRM-eligibility to allocate state funds.

Despite these changes, CPS has continued to use the FRM-eligibility metric as a tool for allocating federal and state money it receives to its individual schools.<sup>10</sup> As it has done for years, CPS uses FRM-eligibility as part of its formula for distributing federal Title 1-A funds to schools. Up until the 2024-25 school year, CPS also continued to use FRM-eligibility as the sole factor for allocating state EBF funds to schools.

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<sup>10</sup> FIIFs are also still used to determine whether individual students are eligible for school fee waivers.





CPS has also employed two new budgeting tools—the Opportunity Index and Equity Index—that use FRM-eligibility numbers along with other demographic, community, and historical measures to assess a school’s level of “need.” As discussed in greater detail in CPS’ Fiscal Year 2025 Budget Book, the higher a school’s level of need, as determined by the indices, the higher its Opportunity or Equity Index score. In recent years, the Opportunity Index has been used to help determine funding for additional teachers, instructional coaching, professional development, and counselors at CPS’ neediest schools, while the Equity Index has been used to guide CPS’ capital budget.

For the 2024-25 school year, CPS significantly altered how it allocates money to District schools by largely moving away from student-based budgeting in favor of a new “student need”-based system. Under this new funding model, all schools receive a core number of administrators, support staff, and teachers, and are then allocated additional staff and discretionary funds based on a combination of their enrollment and their Opportunity Index score.

While this new model has replaced CPS’ previous method of allocating state EBF money to schools, CPS continues to award Title 1-A funds to schools based, in part, on FRM-eligibility data.

Finally, CPS continues to use the Equity Index to help steer its capital budget.

FILFs thus continue to play a key role in factoring school budgets even though the forms are no longer necessary for determining whether students receive free meals.

### **At Least 88 Students Were Improperly Marked FRM-Eligible, Driving Unwarranted Funding to the School**

The OIG’s analysis of FILFs for students at Clerk 1’s and Clerk 2’s school in 2018-19 and 2019-20 identified at least 88 students whose forms were improperly marked eligible despite high household incomes. In many instances, the incomes reported *far exceeded* the NSLP income thresholds. In 2018-19, for example, the OIG found that two students from a family of four with a reported annual income of \$330,000—nearly \$300,000 more than the federal threshold for reduced-price meals—were nonetheless marked eligible. In 2019-20, the same students, this time with a reported household income of \$300,000, were again marked eligible along with 32 other students from households with annual incomes over \$100,000.

It should be noted that the OIG did not obtain evidence demonstrating that any of the families with mismarked forms were complicit in or even aware of their children’s improper FRM-eligible designations.

Ultimately, the total number of students improperly marked FRM-eligible was almost certainly higher than 88. The OIG was only able to obtain FILFs for about 60% of students at the school for 2018-19 and 2019-20. Of those, the OIG further excluded from its analysis



many FIFs which were illegible, missing household size or income information, lacked eligibility determinations, or for which duplicate forms were identified which nevertheless contained *different* income information or eligibility determinations for the same families. Overall, the OIG was able to analyze forms for less than half of the school's students for each school year.

Following this analysis, the OIG compared the results with the same students' historical FRM status in CPS' Online Data Acquisition (ODA) system, the online platform used for entering and recording FRM eligibility information for CPS students. The OIG found that of the 88 students whose forms were improperly marked eligible, 52 were *also* improperly marked eligible in ODA. The OIG also observed numerous other discrepancies between the FRM statuses marked on the FIFs and students' statuses in ODA. Although the OIG was unable to determine the precise cause for these inconsistencies, it nevertheless is clear that many students were improperly designated FRM-eligible both on paper and in CPS' data systems.

The OIG found that Clerk 1's gross negligence, if not outright fraud, was the primary cause of the incorrectly marked forms. During her OIG interview, Clerk 1 acknowledged that she has worked on processing FIFs for her entire CPS career. Nevertheless, when the OIG confronted her with the large number of incorrectly marked forms at her school—forms that required little more than rudimentary data entry into ODA—Clerk 1 offered no explanation other than that she, Clerk 2, and a third employee made a lot of mistakes. The large number of incorrect forms the OIG found, however, demonstrated that, at minimum, Clerk 1 failed to exercise even a basic level of care when processing FIFs for the school.

Although the OIG did not obtain sufficient evidence to definitively conclude that Clerk 1 intentionally falsified these forms, the evidence was suggestive of that. Many of the students whose forms were incorrectly deemed eligible were also incorrectly marked eligible in ODA, suggesting that incorrect data was intentionally entered into that data system. Clerk 1 herself told the OIG that clerks must enter the household size and income information on the forms into ODA for ODA to then determine whether the students listed on the forms were FRM-eligible. If a student's FRM status in ODA was incorrect (based on the information reported on their form), it follows that *different* household and/or income information must have been entered into ODA to trigger the incorrect determination. Additionally, although the OIG observed that some students' forms were incorrectly marked *ineligible*, many more were incorrectly marked *eligible*. In other words, the "errors" in the eligibility determinations did not appear to be random.

During her OIG interview, Clerk 1 confirmed that she marked as FRM-eligible several 2019-20 FIFs with household incomes exceeding the federal income thresholds. Although Clerk 1 denied signing many other FIFs she was shown, she failed to identify who signed those forms, if not her. In contrast, during Clerk 2's interview she identified numerous forms which she claimed Clerk 1 signed. Although Clerk 2 certainly had a motive to identify Clerk 1 as the chief signatory—Clerk 2 admitted to collaborating with Clerk 1 on processing the FIFs and even admitted to signing one form the OIG identified as improperly marked eligible—



she nevertheless correctly identified Clerk 1 as the signer of *all* the forms Clerk 1 herself admitted to signing during her OIG interview.

Nevertheless, the OIG found that Clerk 2 still bore some responsibility for the improperly marked FIFs. Clerk 2 acknowledged helping Clerk 1 process FIFs and conceded that Clerk 1's supposed process—making the eligibility determination herself and then having Clerk 2 sign—was unusual. There was no indication that Clerk 2 took any steps to correct improperly marked forms, to avoid signing off on improperly marked forms herself, or to interrupt Clerk 1's repeatedly incorrect eligibility determinations.

The OIG found that the improperly marked FIFs drove unwarranted funding to the elementary school. Although it is difficult to estimate just how much improper funding the school received, a review of recent CPS budgets suggests it could have totaled between \$81,054 to \$135,090 over the course of the two school years at issue in this investigation.

Finally, as discussed above in the summary of the OIG PAU's performance review, the OIG's investigation also revealed the systemic shortcomings of CPS' continued reliance on paper FIFs, including illegible handwriting on the forms, missing or contradictory household information, and a lack of identifying information for CPS school personnel who process the forms.

Once again, this investigation is just the latest in a long history of cases examining improper or fraudulent FRM-eligibility designations—an issue that the OIG PAU's performance review suggests is all too common among CPS employees with children in CPS schools.

## Recommendations

The OIG recommended that Clerk 1 be terminated and receive a Do Not Hire designation and that Clerk 2 receive appropriate discipline and counseling on how to properly review and process FIFs. These recommendations were made without consideration of the OIG's previous findings and recommendations for the same clerks in OIG Case Number 22-00318, discussed in last year's Annual Report.

Both employees resigned after CPS initiated dismissal proceedings against them and have subsequently received Do Not Hire designations.



# Performance Analysis Unit

The PAU reviews large-scale policies and procedures in search of efficiency recommendations to improve CPS.



## Performance Analysis Unit

In addition to the performance review on Family Income Information Forms summarized above, in Fiscal Year 2024 the OIG's Performance Analysis Unit also reopened a previous performance review on Junior Reserve Officers' Training Corps (JROTC) enrollment practices. While this was precipitated by one particular school that failed to heed key CPS corrective actions recommended in the performance review, the reopened review led to additional OIG program-wide recommendations.

Also cited below is the OIG's first update on the implementation status of District-wide reforms prompted by Fiscal Year 2023's performance review on the unacceptably high rates of lost or stolen technology devices that followed the reopening of classrooms shuttered by COVID-19.

### A. Re-Opened Performance Review: JROTC Enrollment and Procedures

#### Overview

The OIG reopened its 2022 performance review<sup>11</sup> into JROTC enrollment procedures (21-00483) after determining that one high school continued its pattern of routing more than 90 percent of freshmen into JROTC—well after CPS instituted various OIG-prompted reforms to end automatic JROTC enrollments.

This latest review by the OIG's Performance Analysis Unit resulted in the detection of a new set of systemwide issues with the process for scheduling students into JROTC classes in the District's 37 JROTC program high schools<sup>12</sup>. CPS is in the midst of addressing these issues via its second JROTC corrective action plan in two years, impacting what had been the largest JROTC program in the nation.

Finally, this school year, after two sets of CPS corrective actions spurred by two OIG performance reviews, the percent of freshmen in JROTC at the problematic school fell substantially, but still reflected the highest such percent among all CPS high schools offering JROTC programs.

The key problematic high school, identified in this report as School F, was one of eight spotlighted in a March 2022 CPS OIG report for funneling 90 to 100 percent of freshmen into JROTC in School Year 2020-21—usually to fulfill a required Physical Education graduation requirement.

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<sup>11</sup> The Performance Analysis Unit's initial report on JROTC Procedures can be found in the [OIG's 2022 Annual Report](#), with an update in the [2023 Annual Report](#).

<sup>12</sup> This report refers to some of the 37 CPS high schools with JROTC programs inside them and not building-wide CPS JROTC military academies.



As one School F student told the OIG at the time: “Instead of gym, we had to take JROTC.” He said JROTC just showed up on his freshman schedule, without him requesting what was supposed to be an elective course. As far as he knew, PE was not available to School F ninth graders.

In its March 2022 OIG performance review, the OIG expressed concern about the practice of such automatic JROTC enrollments. In the following months, CPS shared a series of reforms to address that and other procedural JROTC issues identified by the OIG. The District launched new principal training sessions to guard against automatic enrollment in JROTC, which requires students to wear a military-style uniform once a week, meet certain grooming standards, participate in marching drills, and take a JROTC course.

Despite all this, by the fall of 2022, School F continued to schedule well over 90 percent of its freshmen in JROTC. It did so again in the fall of 2023.

In fact, after observing School F’s two years of unusually high freshman JROTC enrollment *after* CPS’ corrective actions, the OIG probed deeper and discovered School F had been enrolling 90 to 100 percent of freshmen into JROTC for six consecutive years. In School Year 2023-24, several students and parents continued to maintain to the OIG that the course just appeared on freshman schedules, often during student orientation.

It is important to note that, at that point in time, JROTC offered schools an economic boon. If JROTC was used to fulfill CPS’ Physical Education graduation requirement, it could save a school the cost of a PE teacher. That’s because JROTC instructors are co-funded by the federal government and CPS, while PE teachers at the time were funded by individual schools using Student-Based Budgeting dollars<sup>13</sup>.

As one principal put it: Placing students in JROTC instead of PE was “a way for principals to save some funding for other positions.”

### **CPS Takes Its Initial Action**

After the OIG’s initial March 2022 performance review<sup>14</sup>, CPS announced a series of corrective actions intended to end the automatic routing of students into JROTC. Key among them were instructions that all high school students had to be offered PE and that students could not be scheduled into JROTC until they provided a signed form<sup>15</sup> from their parents consenting to their enrollment in JROTC.

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<sup>13</sup> The following school year, 2024-25, CPS introduced a new budgeting model that moved away from Student-Based Budgeting.

<sup>14</sup> The OIG publicly reported on this topic in [May 2022](#).

<sup>15</sup> During research for its first JROTC performance review, the OIG found that none of the eight spotlighted schools could provide a specially selected random sample of signed parent consent forms. Meanwhile, some JROTC students at these schools and their parents told the OIG they had never been given parent consent forms, which were required at the time.



As part of its new procedures, District-level CPS JROTC staff repeatedly monitored whether JROTC program schools had notified CPS of the submission of signed parent consent forms that were supposed to be provided by the 20th day of school. In addition, by the second semester of School Year 2023-24, JROTC staff started reviewing each of the actual consent forms to ensure they were properly filed.

These changes and others appeared, on the surface, to have provided more freshmen with PE options because they resulted in increased PE enrollment rates and reduced JROTC enrollment rates in all spotlighted JROTC program schools—except at School F. There, the fall 2024 JROTC freshman enrollment rate, at 96 percent, was higher than the 93 percent rate the year before, and marked the sixth consecutive year the school had enrolled more than 90 percent of its ninth graders in JROTC, as indicated in **PAU-Table 1**.

**PAU-Table 1: Six-Year Comparison of Freshman JROTC vs PE Enrollments at School F**

Course	SY 2019	SY 2020	SY 2021	SY 2022	SY 2023	SY 2024
JROTC	97 (92%)	173 (100%)	130 (96%)	128 (96%)	105 (93%)	109 (96%)
PE	9 (8%)	0 (0%)	6 (4%)	6 (4%)	8 (7%)	5 (4%)

Source: OIG Analysis of JROTC Program School F Freshmen with First Quarter Grades in JROTC and PE for SY 2021 through SY 2024. First Semester Grades Were Analyzed in SY 2019 and SY 2020.

### School F Students Continue to Describe Automatic JROTC Enrollment

To follow up, the OIG conducted interviews of a dozen 2023-24 School F JROTC freshmen and/or their parents. At least 10 told the OIG that JROTC just appeared on freshman schedules, mostly at orientation, before parents even had a chance to fill out a parent consent form. Most of the students or their parents said PE was not offered as an option, although a few said they were told they did not have to take JROTC.

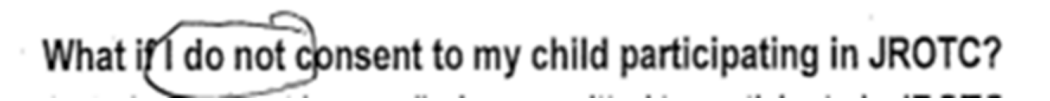
Two said they were told if they did not take JROTC this year, they'd have to take it next year. Another student said she was told she had been placed in JROTC “for my health.”

In addition, two different School F parents attempted unsuccessfully to override a JROTC form that asked parents to sign their consent to JROTC but did not offer the option of rejecting JROTC or of taking PE—a course required for graduation that could be waived via a separate exemption form. These parents said that, during freshmen orientation, they were handed schedules with JROTC already on them and then later, during that same orientation, they were given JROTC parent consent forms to sign.

These two parents circled certain words (see **PAU-Figure 3**) or a paragraph on the consent form to try to indicate their opposition to a JROTC class for their children. The students were enrolled in JROTC anyway.



### PAU-Figure 3: Parent Marks Attempting to Object to JROTC on School F Parent Consent Form



Source: Screenshot of School F JROTC Parent Consent Form with Markings Made by Parent of 2023-24 Freshman.

One parent, faced with the sole choice of signing the consent form, circled the entire paragraph that began “What if I do not consent to my child participating in JROTC?” She said she also told the instructor she did not want her daughter in JROTC, and assumed the instructor would toss out the form, but he didn’t.

These instances constituted improper automatic JROTC enrollments as, under CPS’ new rules, high school students were not supposed to be scheduled into JROTC until after they provided signed JROTC parent consent forms.

In addition, the *only* freshmen placed in PE rather than JROTC this particular school year were five diverse learners. The parent of one of them told the OIG her child was handed a schedule with PE already on it.

Finally, the OIG also found evidence that 42 percent of School F ninth graders had been enrolled in JROTC improperly—before they provided signed parent consent forms—contrary to new CPS guidelines. Another 11 percent of freshmen submitted signed forms without any dates on them, preventing a determination of whether those forms were filed on time.

School F’s principal insisted to the OIG that a PE option was communicated at freshman orientation and open houses — at a minimum by him; he could not be certain who else mentioned it. The principal did not remember being told during new JROTC principal training that students should not be enrolled in JROTC until they provided signed parent consent forms.

“Where do I put them in the meantime?” he asked.

The principal said his school scheduled students based on course availability, and he didn’t think he needed another PE teacher.

So how did School F slip through the cracks of CPS’ new “corrective actions?” To unravel this, the OIG expanded its inquiry beyond School F to include the procedures being used to monitor and audit JROTC program school enrollment, parent consent forms, and PE waivers.

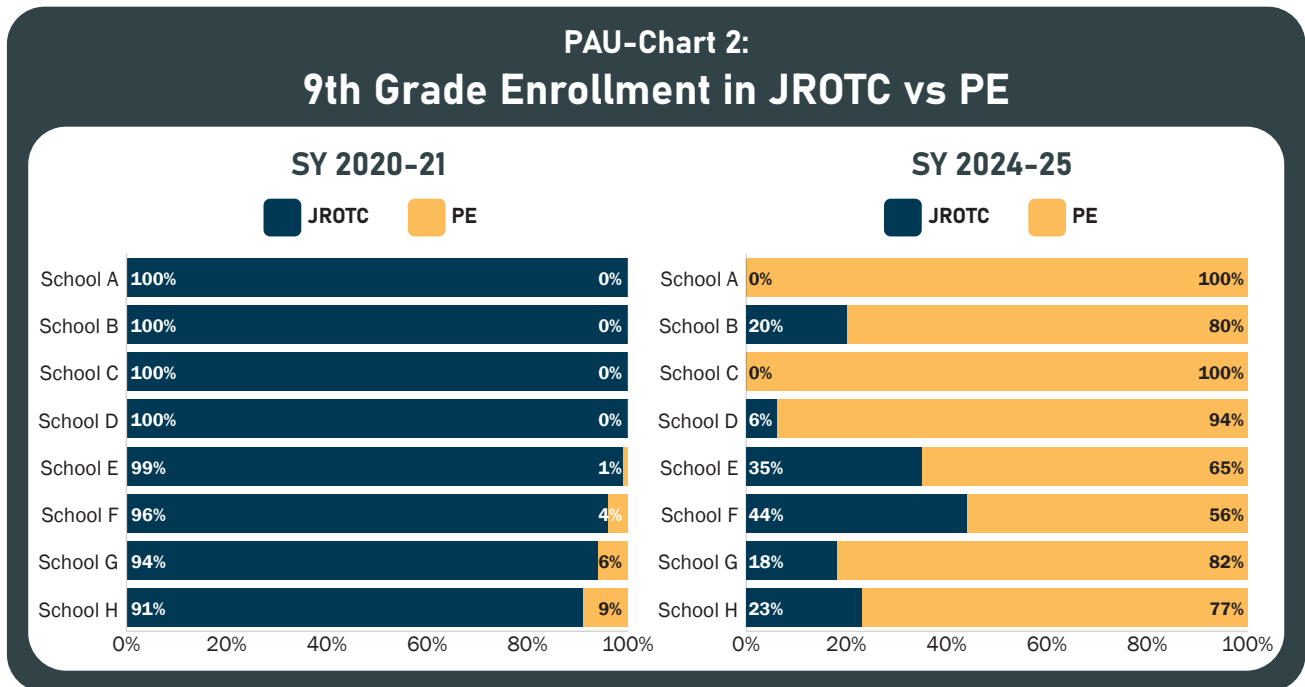
In doing so, the OIG found several structural weaknesses: the JROTC monitoring and auditing process — including the inherent conflict of JROTC auditing itself; the JROTC parent consent forms themselves; the CPS/JROTC record-keeping system; the JROTC program school principal training; and overall PE-waiver monitoring.



All this resulted in a second series of OIG JROTC findings and recommendations in March of 2024, which, in turn, led to a second set of CPS corrective actions. Key among them was that PE is now the default class into which all high school students are scheduled until they produce signed JROTC parent consent forms or signed PE exemption forms.

The OIG’s latest recommendations were not intended to inhibit students from taking JROTC if they wanted it. Indeed, the OIG has heard many positive student remarks about JROTC. The recommended changes were merely trying to prevent students from being shuffled into JROTC without affirmatively choosing it over PE. The two classes are very different, and CPS students are entitled to take PE if they want it. JROTC, meanwhile, is supposed to be an elective.

Finally, in School Year 2024-25, far more School F freshmen were taking PE, as indicated in **PAU-Chart 2** below. In fact, that school year more than half of School F ninth graders took PE versus only 4 percent in 2020-21—the school year examined in the OIG’s initial JROTC performance review.



Source: OIG Analysis of the Number of 2020-21 and 2024-25 Freshmen with First Semester JROTC and PE Grades at Eight CPS JROTC Program High Schools Spotlited in the OIG’s 2022 JROTC Performance Review for their 2020-21 JROTC Freshmen Enrollment.

Although School F still has the highest fall 2024 freshman JROTC enrollment rate among the eight original spotlighted schools, its current 44 percent rate represents a sizeable change from its 96 percent rate in both the fall of 2023 and the fall of 2020.



## Second Round of OIG JROTC Findings

The OIG's reopened performance review was released in March of 2024 and found, among other things, that:

- Automatic JROTC enrollment continued, at a minimum, at School F, despite CPS reforms. No Districtwide documentation was found by the OIG proving that freshmen at School F—or any other CPS JROTC program high school—were being offered the option of either PE or JROTC. The JROTC parent consent form did not offer parents the option of affirmatively choosing PE over JROTC.
- JROTC department employees were monitoring and auditing JROTC consent forms while also having editing access to compliance records about JROTC enrollment. This represented a conflict of interest.
- New JROTC principal training materials did not make clear that all CPS high school students had to be offered PE and could only be scheduled into JROTC once they produced a signed JROTC parent consent form.
- All JROTC program schools were not following new CPS JROTC guidelines to upload signed JROTC consent forms by the 20th day of school and to drop students who did not meet that deadline at the end of the first semester. In fact, six JROTC program schools did not have any parent consent forms uploaded as of the 21st day of school, and CPS could not say how many JROTC students were ultimately dropped for lack of timely parent consent forms.
- Several CPS JROTC program schools were not obtaining PE exemption waivers from JROTC students, as required by CPS policy, and CPS was not monitoring whether such waivers were being filed.
- Two JROTC program schools had at least 10 percent higher diverse learner rates in JROTC than in their schools as a whole, even though the OIG noted previously that this was inconsistent with national JROTC regulations.

## Second Round of OIG Recommendations and CPS Corrective Actions

In response to the OIG's reopened performance review, CPS issued a second round of corrective actions in May of 2024. The OIG's 11 most recent recommendations for the system's 37 JROTC program schools, as well as CPS' responses, are summarized below.

- 1. Obtain JROTC parent consent forms as soon as possible.** Offer incoming freshmen a choice between JROTC and PE before the start of the school year. Each spring, ninth through 11th grade JROTC students should be encouraged to provide signed parent consent forms for the next school year—before their current school year ends.



CPS Response: Schools obtained JROTC ninth through 11th grade consent forms for the upcoming school year by June 1, 2024. Incoming freshmen were offered a choice between PE and JROTC before the start of the school year at orientation and similar events. All high school students now have PE as their default class, so at JROTC program high schools, incoming freshmen are supposed to be enrolled in PE unless they choose JROTC.

- 2. Give parents and students a choice on the JROTC parent consent form.** The form should have a box for parents to check if they want their child in JROTC, and another box if parents prefer that their child take the required course of Physical Education.

CPS Response: The form mentions that PE is a required course that can be fulfilled by JROTC and that students who submit signed JROTC parent consent forms are exempt from PE. CPS believes that “adding checkboxes would be redundant and potentially contradictory for families filling out the form as students do not traditionally take both PE and JROTC due to other required coursework.” The OIG remains concerned that the form does not allow parents or students to refuse JROTC or to request PE; their only clearly stated choice on the form is to sign their consent to JROTC. Apparently some parents did not realize that they also could refuse to sign the parent consent form. This is why at least two parents tried to indicate their opposition to JROTC by circling certain words or a paragraph on the form.

- 3. Clarify grade level on the JROTC parent consent form.** Current language makes it unclear whether incoming freshmen or existing freshmen are filling out the form.

CPS Response: CPS will include the JROTC grade level for which the student is applying on the School Year 2025-2026 JROTC parent consent form.

- 4. Incorporate the required PE exemption waiver function into the JROTC parent consent form.** Schools already have enough forms to manage.

CPS Response: The School Year 2024-25 JROTC parent consent form, if signed, fulfills the function of a PE exemption form.

- 5. Move JROTC parent consent form auditing away from employees of the JROTC department,** which should not be auditing itself.

CPS response: This function has shifted from the Department of JROTC to individual networks, with oversight by the Office of Network Support.

- 6. Remove the JROTC’s edit access to JROTC compliance records.**

CPS Response: Starting in School Year 2024-25, no one attached to the Department of JROTC has edit access to JROTC compliance records.

- 7. Start the audit of JROTC consent forms on the 21st day of school.**

CPS Response: JROTC parent consent forms of existing ninth through 11th graders are due in the spring, by June 1st, of those students’ existing school year. Networks will audit them



over the summer. Auditing of the forms of incoming freshmen will be completed by no later than September 16, or as close to the 20th day of school as possible, so that students can receive credit for another class if they need to be transferred out of JROTC. The District did not collect data about the number of students who were dropped from JROTC based on lack of a parent consent form detected during School Year 2023-24 audits but plans to do so in 2025-26.

- 8. Consistency and expansion of JROTC training is needed.** All training documents used during principal training should state in writing that: high schools must offer all students PE; that JROTC can also fulfill this requirement; that students should be scheduled into PE and not enrolled in JROTC until they provide signed JROTC parent consent forms, and that schools must upload those forms by the 20th day of school or students without them will be dropped from JROTC and transferred to PE. Additional documentable training or written guidance on these points should be provided to the school staff responsible for scheduling JROTC students, as well as those responsible for uploading and attesting to signed JROTC parent consent forms.

CPS Response: CPS has already begun implementing this recommendation, including at a May 2024 End of the Year Principal Meeting, to which programmers and counselors also were invited. Through various means, 95 percent of schedulers received this information. A new District-created audit checklist for JROTC auditors should help ensure compliance.

- 9. Record JROTC start and end enrollment dates.** To ensure compliance with new CPS guidelines, CPS should record the date on which a student enrolls and dis-enrolls from JROTC.

CPS Response: The student information system only has the functionality to record the start and end date of a semester, not of a student in a particular class.

- 10. Publicize the PE policy, the PE waiver requirements, and how to get help with PE funding.**

CPS Response: The PE Department is finalizing direct school communication regarding K-12 PE updates and exemptions. As for funding, there is no separate process to request funding for a PE teacher.

- 11. Consider contacting national JROTC headquarters for guidance on how to address schools with problematic JROTC diverse learner rates.** Federal regulations recommend that the percentage of diverse learners in JROTC should not be more than 10 percentage points higher than a school's entire diverse learner rate. Two CPS schools hit this mark in School Year 2023-24 — one for the second year in a row.

CPS Response: The JROTC Department contacted Cadet Command and was told that diverse learner situations should be handled on a "case by case basis." Principals were told at a May 2024 End of the Year Principal Meeting that federal JROTC regulations recommend that the



percent of diverse learners in a JROTC program school should be “close to or no more than 10 percentage points higher than the school’s diverse learner rate as a whole.” No school currently hits that mark. The Department of JROTC will monitor diverse learner percentages and address any outliers as necessary.



## B. Performance Review Update: Asset Inventory Audit and Recovery Procedures

CPS appears to be making some progress in reducing its number of lost and stolen technology devices following a CPS OIG performance review that spotlighted an unacceptably high percentage of missing tech devices after students returned to schools shuttered by the COVID-19 pandemic (22-01569).

The percent of lost or stolen Chromebooks—the most-often used type of technology in CPS schools—dropped from roughly 11 percent in the fall of 2022 to about 7 percent at the end of the 2023-2024 school year, analyses by the OIG’s Performance Analysis Unit and CPS Information and Technology Services indicated. With that change, the number of lost or stolen Chromebooks fell from just over 45,000 to under 31,800, the two analyses indicated.<sup>16</sup> Another type of technology frequently used by students—cell phone hot spots—also saw a large downturn in the percentage lost or stolen, at 39 percent. iPads, often used in younger grades, saw only a slight decrease in their percentage lost and stolen. See **PAU-Table 2**.

**PAU-Table 2: School-Based CPS Lost/Stolen Rates by Tech Device Type Over Time**

Device	SY 2021-22* % Lost/Stolen	SY 2023-24 % Lost/Stolen	SY 2021-22* # Lost/Stolen	SY 2023-24 # Lost/Stolen	SY 2021-22* # Devices	SY 2023-24 # Devices
Chromebook	11%	7%	45,024	31,779	415,473	457,475
iPad	9%	8%	10,636	10,703	119,766	142,429
Cell Hot Spot	47%	39%	7,215	10,684	15,383	27,380

\*Excludes 25 CPS schools that did not complete their inventory audits.

Source: SY 2021-22 Audit Data Provided by CPS Asset Management as of September 2022 and analyzed by OIG; SY 2023-24 Audit Data Analysis as of June 2024 and Provided by CPS Information and Technology Services. Charter Schools Were Excluded from All Data.

In addition, in the wake of the OIG’s 2023 report on CPS Asset Inventory Audit and Recovery Procedures, CPS has more aggressively exercised its power to try to electronically locate missing devices, as recommended by the OIG — and has had some success in the process.

CPS officials say that as of late June of 2024, they had sent recovery messages to more than 50,000 devices. While there were some problems with the distribution of these messages, about 17,000 devices received the message by that time period, and more than 13,500 of them were recovered within CPS boundaries. See **PAU-Chart 3**.

In addition, as of November 2024, 8,346 CPS tech devices were detected outside Illinois—including many outside the United States, according to CPS. In fact, the majority of those

<sup>16</sup> These two analyses may not be exactly comparable because they were not done at the same time of year and different agencies or departments analyzed them. The first analysis was conducted by the OIG in early September 2022, using data provided by CPS Asset Management. The second was done by CPS Information and Technology Services using data from June 28, 2024.



CPS devices were detected overseas in some 140 different countries, including Azerbaijan, Barbados, China, Ethiopia, Jordan, Nicaragua, South Korea, Sweden, Serbia and Uruguay, CPS officials said.

“At this point we cannot speculate how those devices wound up outside of the United States, but [we] continue to investigate,” one CPS official said.

Meanwhile, unrecovered devices have been frozen and will be wiped clean of data, officials said.

Although CPS had been paying a vendor for geotracking services, the OIG found that it barely used this service but should be doing so. Geotracking suffered “functionality constraints” in the past, CPS officials said, but CPS is working on achieving full functionality.

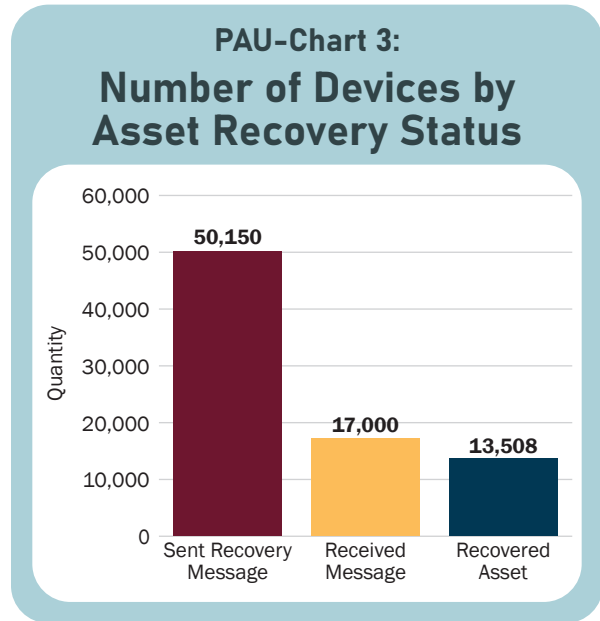
During the OIG’s research, several school administrators said they could not afford a school-based technology coordinator (commonly referred to as a techco) but they would be willing to split the cost of one with another school. As a result, the OIG recommended that network chiefs try to pair up schools in their network to share techcos. CPS officials from Information and Technology Services say they “recognize the need to increase technology supports across all schools” and are working on a solution.

### Previous Findings

In its 2023 Annual Report, the OIG reported its findings that the first in-school technology audit conducted after students returned to classrooms shuttered due to COVID-19 detected millions of dollars in missing technology. The OIG found that the overall percentage of tech devices in schools marked lost or stolen in 2021-22 stood at 11 percent—a level the OIG called unacceptably high—and numbered more than 77,500. Among solely student-assigned devices, the rate was particularly alarming, at 27 percent.

Meanwhile, at some individual schools, the lost/stolen rate climbed as high as one out of every five tech devices, and even, at three schools, one out of every two. At 36 schools, 100 percent of tech devices assigned specifically to students had been marked lost or stolen. Some students were listed as losing two, three, four and even five tech devices.

The OIG found that in some cases, students loaned tech devices by their schools for remote learning during the pandemic had never returned them once normal classes resumed—and



Source: Analysis by CPS Information and Technology Services using data from June 28, 2024.

probably faced no repercussions as a result. In other cases, school audit inventory workers were marking as “lost” items they had not searched for carefully enough—an OIG discovery that raised questions about whether some devices were actually “lost.”

For example, when the OIG asked one teacher about four tech devices assigned to her that had been marked lost, she started opening drawers and cabinets in her office only to pull out two “lost” devices. “I certainly was never told these were lost,” she told the OIG.

In general, the OIG found that the entire inventory process suffered from a lack of accountability, as no one—not the principal, inventory workers, or the assigned users of devices—had to answer for the lost items or the rate at which devices were disappearing. Therefore, the OIG recommended that principals be held responsible for their school’s inventory audit results, that those results be shared with the network chiefs who evaluate principals, and that those results be part of a principal’s annual evaluation. But first, CPS needed to give principals the proper tools to oversee their inventory audit results. The OIG recommended that they be trained on how to read audit results and that they be given better Compliance Reports at the end of those audits.

At the time, the OIG viewed CPS Compliance Reports as largely uninformative because they focused on items identified as Missing, and, in doing so, hid the number of Lost or Stolen tech devices among those defined as Missing, which included Disposed of, Recycled, Returned to Vendor and Surplus. The OIG recommended that Compliance Reports include the percent of Lost versus Stolen tech and non-tech devices as well as student-assigned, staff-assigned and unassigned tech devices. It encouraged an emphasis on conducting more thorough searches and suggested that schools with poor results be flagged for extra training or help.

### Updates on CPS Actions

In response, CPS officials said the CPS asset management vendor is expected to start working on new compliance reports shortly. Meanwhile, 16 schools that scanned 70 percent or less of their tech and non-tech 2023 inventory were asked to locate their missing devices, “as this scanning range suggests incomplete inventory management practices.” Outside technicians were asked to help them with those searches.

Concerning accountability, CPS said, “by providing better insight into inventory progress and loss levels through reporting to ONS [the Office of Network Support, which includes network chiefs] there will be sufficient awareness to instill accountability.”

In total, the OIG issued 20 findings and 16 Recommendations concerning CPS asset inventory audit and recovery procedures, and CPS planned various corrective actions in response. Several have since been implemented; others are in process. Updates on some of the system’s other additional key corrective actions include the following:





- The OIG recommended that students and staff be notified in writing of any missing asset assigned to them and asked to produce them by a certain deadline. As a result, last school year, CPS sent communications to more than 10,700 students and more than 2,400 staff members listed with lost tech devices, asking them to alert CPS by a certain date as to whether they still had such devices.
- With some students or staff listed with as many as 10 lost devices in the past, the OIG recommended that students and staff be warned of the consequences of losing or damaging their tech devices. A newly proposed Device User Agreement warns staff that if their device needs to be replaced more than two times within the device's four-year life cycle, they may be required to reimburse CPS for the cost of replacing it. The student user agreement is still under development.
- The OIG recommended that CPS drop its requirement that schools file a missing property report with the Chicago Police Department for every device listed as lost in its inventory as law enforcement was not acting on these reports. CPS has since stopped this practice. Now, only stolen CPS devices, which reflect a far smaller number than those marked lost, require police reports.
- Due to the lack of knowledge about the inventory process exhibited by some school-based technology coordinators, CPS was urged to require such techcos to pass a test before conducting an inventory audit. Techcos now must score at least 80 percent correct on a brief exam before conducting an inventory audit.
- The OIG recommended that CPS consolidate training materials that were scattered over various locations and provide specific training for principals on how to read key asset inventory reports. CPS has created a guide to understanding an audit detail report for principals, which is a step forward, but it does not specifically tell principals how to find information about lost or stolen items, such as the last location of a device and the last person assigned the device. Principals need this information to help investigate where lost items might be and to look for patterns among missing devices.

The OIG recommended that CPS either resolve several issues with its asset management software vendor or get a new vendor. CPS is planning to switch to a new vendor.



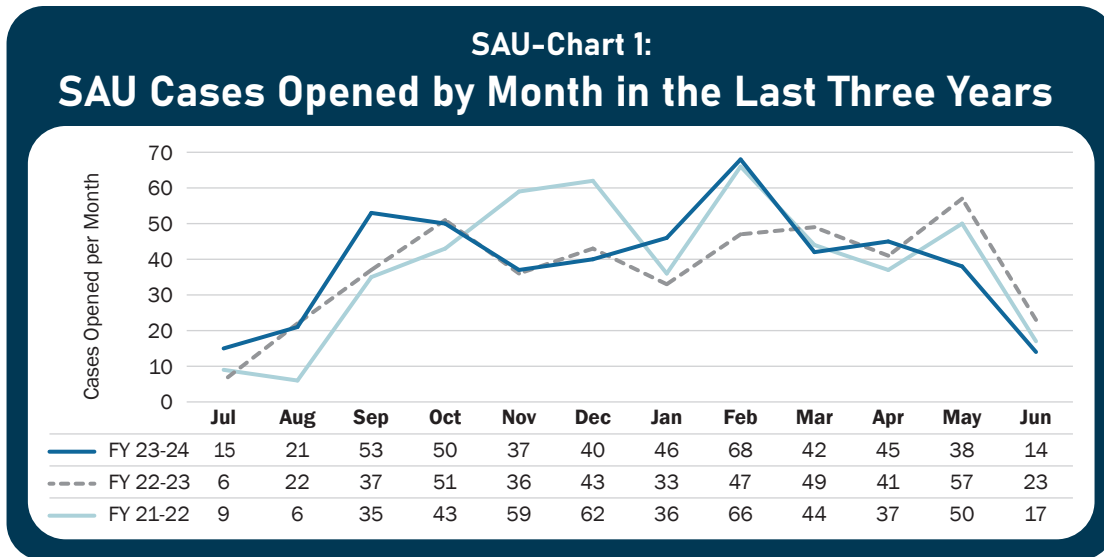
# Sexual Allegations Unit

The SAU investigates allegations of sexual misconduct by a CPS-affiliated adult, including employees, contractors, vendors and charter schools, where the victim is a CPS student and/or a minor.



## A. Overview

The SAU opened 469 investigations from July 1, 2023, through June 30, 2024. This was a 5.4% increase over the previous fiscal year. In that same timeframe, the SAU closed 363 cases.

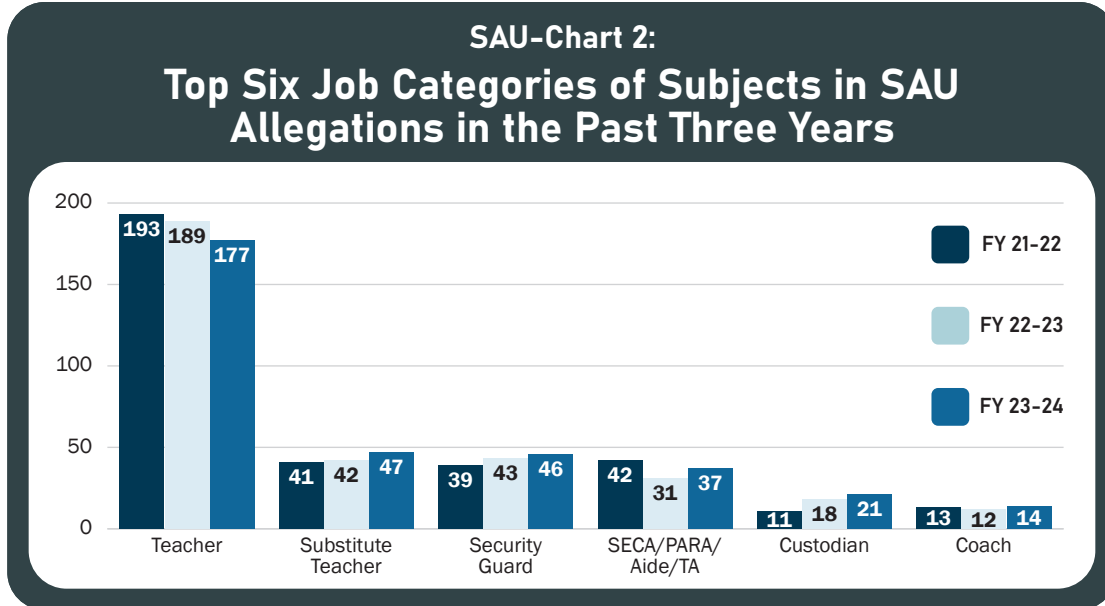


The SAU has consistently opened over 400 investigations each fiscal year since its inception in 2018. While there are many factors and variables to consider, this steady volume has largely been attributed to three key factors:

1. The District's expanded policies and ongoing training initiatives that have raised awareness across the CPS community about signs and types of sexual misconduct, the importance of maintaining professional boundaries, and reporting obligations for all CPS-affiliated adults;
2. Their investigation of allegations far beyond those required by Title IX. A significant portion of the allegations handled by the SAU involve conduct that is not explicitly sexual but raises concerns of poor professional boundaries or grooming, such as showing a student an inordinate amount of attention, driving a student without permission, and/or communicating with a student through social media; and
3. The OIG's commitment to transparency and accountability, despite the difficult subject matter the SAU is charged with investigating. The SAU's bi-annual public presentations to the Board of Education and the OIG's annual reports share far more details about sexual misconduct allegations than any other K-12 district.

The SAU has compiled extensive data relating to its complaints and investigation outcomes since its creation over six years ago. Beyond helping improve the SAU's efficiency and operations, this data has allowed the SAU to identify and track noteworthy trends and shifts across its many investigations.

The following chart reflects the top six job categories that were the subject of SAU allegations for the last three years. By regularly tracking this information and sharing it back with the Office of Student Protections and Title IX, the SAU hopes to support the District’s proactive prevention and training initiatives.



## B. CPS Leads Nation in Response to Sexual Misconduct

The SAU is the nation’s only independent investigative body tasked with handling such a broad array of sexual misconduct and other related allegations involving K-12 school-based staff and students. The SAU is also the only K-12 entity that shares extensive data about its complaint volume and case outcomes, in both its annual reports and bi-annual public presentations.

Six years after the SAU’s creation, CPS was recently praised as a “best case” scenario by educational sexual misconduct researcher Charol Shakeshaft in her recent book, *Organizational Betrayal*.<sup>17</sup> Due in large part to the District’s robust policies and the SAU’s role as the dedicated investigative unit for these allegations, Shakeshaft concludes that CPS is more

“CPS was recently praised as a “best case” scenario by educational sexual misconduct researcher Charol Shakeshaft

<sup>17</sup> Shakeshaft, Charol. *Organizational Betrayal: How Schools Enable Sexual Misconduct and How to Stop It*. 2024. Page 43. Available from the Harvard Education Press: <https://hep.gse.harvard.edu/9781682539286/organizational-betrayal/>



likely to receive and investigate reports of misconduct than school districts that lack such a specialized office.<sup>18</sup>

**Policies:** When analyzing policies from across the nation, Shakeshaft found that the areas most commonly missing included “social media-friending students, . . . guidance on home visits, transportation of a student in a personal vehicle, and specific policies for interacting with students on social media.”<sup>19</sup> CPS’ policies speak to each of these topics, and the SAU often investigates alleged infractions of these policies.

**Data:** Because the SAU publishes far more sexual misconduct data than any other K-12 school district, Shakeshaft used the SAU’s 2022 Annual Report when trying to determine the prevalence of school-based sexual misconduct. While noting that SAU’s numbers are likely a conservative estimate because schools can only investigate what is reported, Shakeshaft calls the SAU’s numbers instructive.

The OIG acknowledges that its transparency with respect to data and case outcomes has resulted in criticism of CPS and more public awareness of sexual misconduct incidents within CPS than would otherwise be possible. Other K-12 districts escape such publicity and scrutiny - not because sexual misconduct does not occur within their schools - but because they do not investigate such a wide array of allegations or report this data as the SAU does.

Nonetheless, the Board of Education continues to prioritize student safety by supporting the critical work and transparency of the SAU. In fact, through CPS’ expanded policies, training, and independent investigations, the OIG surmises (and Shakeshaft appears to agree) that CPS is better suited than any other in the country to respond to allegations of sexual misconduct and identify and prevent grooming and other impermissible conduct before it escalates.

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<sup>18</sup> The other best-case scenario Shakeshaft identified is New York City Public Schools, which in 1990 established the Office of the Special Commissioner, led by the Special Commissioner of Investigation (the “SCI”). While the SCI also investigates cases of adult-on-student sexual misconduct, it is a law enforcement oversight agency that does not report to the NYC Department of Education. (See <https://nycsci.org/faqs/>.) Further, it appears that the SCI, on average, investigates fewer cases of adult-on-student sexual misconduct. According to Shakeshaft, in 2022 the SCI investigated 136 cases of sexual misconduct, 40 of which were substantiated. In comparison, the SAU opened 447 cases in the same year. (See Shakeshaft, 44; *Fiscal Year 2022 Annual Report*, Office of Inspector General Chicago Public Schools, 37.)

<sup>19</sup> Shakeshaft, 198-99.



## C. Cases Involving Sexual Acts

### » *Middle School Charter Teacher Sexually Abused a 16-Year-Old CPS Student (22-00283)*

A middle school charter teacher met a 16-year-old CPS student on a dating app and engaged in sexual activity with them. He also engaged in sexual electronic communications with the student prior to meeting them in person. While the student admitted to misrepresenting their age to sign up for the app, there was circumstantial evidence that the charter teacher knew, should have known, or was deliberately indifferent to learning whether the student was a minor prior to engaging in sexual acts with them.

The OIG found that, under a preponderance of the evidence standard, the charter teacher's conduct constituted the criminal offense of aggravated sexual criminal abuse. Additionally, had the charter teacher been a CPS employee, his sexual contact and electronic communications with the student would have constituted prohibited sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. He also would have violated CPS' Staff Acceptable Use Policy and CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS declined to investigate. CPD investigated and arrested the charter teacher for aggravated criminal sexual abuse, but the Cook County State's Attorney's Office declined to pursue the case.

The charter teacher was pulled from active duty upon his arrest.

Had the charter teacher been a CPS employee, the OIG would have recommended termination of his employment. The OIG recommended that CPS take appropriate steps to permanently prevent the charter teacher from working for, or volunteering in, the District in the future. The charter school had planned to terminate the charter teacher's employment, but he resigned during the disciplinary proceedings. The Board subsequently placed the charter teacher on an internal Do Not Hire list.

### » *High School Vendor Security Guard Engaged in Sexual Activity with a 17-Year-Old CPS Student who Attended Another School and Sent Sexual Messages to Two Students at the School Where He Worked (21-01333)*

A high school vendor security guard sent sexual and flirtatious Snapchat messages to two students at the school where he worked ("Student 1" and "Student 2"). He asked Student 1 about their sexual preferences, said that Student 2 was his "type," and continued messaging the two students even after Student 1 pointed out their age and told him his conduct could have criminal consequences. He also asked Student 2 if they would sell drugs with him. The security guard admitted to the police that he sent sexual messages to the students. The OIG



found that the security guard's behavior toward Student 1 was intended to groom them for sexual activity.

The security guard also engaged in sexual activity with a 17-year-old CPS student from another school ("Student 3") whom he met outside of his vendor-employee status. During the OIG's investigation, Student 3 was arrested with the security guard for a crime not related to the OIG's investigation. Because the security guard planned and engaged in criminal activity with Student 3, the OIG also found that the security guard contributed to the delinquency of a minor.

DCFS investigated and determined there was credible evidence of sexual exploitation of Student 1 and Student 2. DCFS' investigation also noted a "risk of harm" for two other minors that the security guard was mentoring in his personal capacity. After the security guard's arrest, the OIG discovered that Student 3, who was arrested along with him, was one of these minors.

CPD opened two cases related to Student 1 and Student 2. The security guard was arrested and charged with one count of harassment or obscene proposal to a victim under 18 in connection with his conduct toward Student 1. He pled guilty to the charge and received two years' probation. He was not charged in connection with his Snapchat messages to Student 2. A suburban police department opened a case relating to the allegation that the security guard sexually abused Student 3. The security guard was not charged in that case.

If the security guard were a CPS employee, his conduct toward Student 1, Student 2, and Student 3 would have constituted prohibited sexual misconduct under the Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. The conduct toward Student 1 would have also constituted grooming as defined by the CPS Reporting of Child Abuse, Neglect, and Inappropriate Relations between Adults and Students Policy in effect at the time. He also would have violated CPS' Staff Acceptable Use Policy and CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

The security guard's employment was terminated by the vendor company when it was notified of the allegations. The OIG recommended that CPS take appropriate steps to permanently prevent the security guard from working for, or volunteering in, the District in the future. The Board subsequently placed the security guard on an internal Do Not Hire List.

» *Elementary School Volunteer Committed Sex Crimes Against CPS Students, Was Never Approved to Be a Volunteer (19-00842)*

An elementary school volunteer committed sex crimes against CPS students; some of these crimes reportedly took place at the school where he volunteered. This misconduct took place from 2014 to 2016, prior to the creation of the Sexual Allegations Unit in 2018. The OIG's



investigation was initiated in 2019, after CPS was notified about pending criminal charges against the volunteer.

CPS received its first complaint about the volunteer in fall 2015, when two students (“Student 1” and “Student 2”) alleged that the volunteer made sexual advances toward them and asked them to watch pornography with the volunteer. The principal reported the allegations to CPD, DCFS, and the CPS Law Department. Following these complaints from Student 1 and Student 2, the volunteer was banned from the school for failing to complete his volunteer application, though he had already been volunteering at the school for approximately two years, since 2013. Several months later, in spring 2016, another student at the school (“Student 3”) alleged that the volunteer had sexually assaulted them multiple times over the past year. Student 3 and their mother reported the allegation to CPD. The principal contacted DCFS and the CPS Law Department and explained that the volunteer had already been banned from the school for failing to complete his volunteer application. The Law Department attempted to follow up with Student 3’s mother about the allegation but did not receive a response.

In 2019, the Cook County State’s Attorney’s Office subpoenaed CPS for records relating to the former volunteer. The CPS Law Department forwarded the subpoena to the OIG and sent the OIG its records of the complaints against the volunteer from 2015 and 2016. The OIG then initiated its investigation and acquired records of four CPD investigations into the volunteer. CPD’s records identified three more alleged victims who were also CPS students: a sibling of Student 3 (“Student 4”), and two other students who attended a CPS school with which the volunteer was not affiliated (“Student 5” and “Student 6”).

CPD records of interviews with the students reflected numerous allegations:

- Student 1 reported that the volunteer touched and rubbed their body and propositioned them for sex on various occasions while they were a student at the school.
- Student 2 did not participate in CPD’s investigation.
- Student 3 reported that the volunteer asked to teach them about sex and made the student give him oral sex in the uniform room at the school every day for a week. Student 3 also reported that the volunteer tried to engage in penetrative sex with them.
- Student 4 reported that in approximately 2015, the volunteer lured them into the uniform room at the school and claimed to need photos of their naked body to assess their clothing size.
- Student 5 and Student 6 said that the volunteer propositioned them for sex in 2014, asking them whether they would be scared if he took them somewhere to get naked.





The volunteer was charged in two of the cases investigated by CPD. He pled guilty to the charge of aggravated criminal sexual abuse relating to his conduct toward Student 1. Under the Illinois School Code, aggravated criminal sexual abuse is an enumerated offense that makes the volunteer ineligible to be a CPS employee or volunteer. The volunteer also pled guilty to a downgraded charge of battery in the sexual assault case involving Student 3. The statute of limitations expired before the volunteer could be charged in connection with his conduct toward Student 4, Student 5, or Student 6.

DCFS was contacted three times regarding separate incidents and investigated all three allegations. One investigation resulted in a finding that the volunteer sexually abused Student 3.

In addition to violating criminal laws, the volunteer's conduct violated CPS' Comprehensive Non-Discrimination Title IX and Sexual Harassment Policy.

The OIG's investigation also established that the principal of the elementary school at the time of the allegations allowed the volunteer to assist at the school for approximately two years without requiring him to complete a volunteer application or criminal background check in violation of CPS' Volunteer Policy. A background check would have revealed that the volunteer had a criminal history (for non-sexual crimes).

The volunteer's spouse was a staff member at the same school and was also accused of misconduct. Student 1 alleged that the spouse confronted them about their report against the volunteer and accused them of lying. Student 1's parent also alleged that the volunteer tried to bribe them with money to prevent them from reporting the abuse to the police, and the spouse was present at the time of the bribe. However, the OIG's investigation did not uncover any evidence to corroborate these allegations.

At the initiation of the OIG's investigation in 2019, CPS blocked the volunteer from entering CPS properties.

The OIG recommended that CPS permanently block the volunteer and take any additional appropriate steps to prevent him from working for, or volunteering in, the District. The Board permanently blocked the volunteer and placed him on an internal Do Not Hire list.

Additionally, the principal at the time resigned from his CPS employment prior to the investigation. The OIG recommended that the principal's file be flagged for consideration of this investigation in the event he applies for a CPS position or otherwise undergoes a CPS background check. The Board added a Do Not Hire designation to his personnel file.

» ***Elementary School Teacher Engaged in Serial Grooming Behavior and Sexually Abused Multiple Students (21-00364)***

The OIG initiated this investigation upon receipt of an allegation that an elementary school teacher kissed a student ("Student 1") on the lips during class; the student disclosed this in



2021, but the conduct occurred approximately three years prior. The investigation revealed additional allegations against the teacher by six different students dating back at least six years prior to the allegation. The investigation established that he committed sexual misconduct against CPS students in his capacity as a teacher at the elementary school and committed more serious offenses against certain CPS students outside of school through relationships that he established with their families.

The OIG found that the teacher kissed Student 1 on the mouth during class and touched or smacked the buttocks of two other students (“Student 2” and “Student 3”) on multiple occasions.

Further, the teacher spent years grooming three other students (“Student 4,” “Student 5,” and “Student 6”) for the purpose of sexual abuse. He ingratiated himself within the students’ families and became the students’ “godfather,” taking them on outings and having them spend the night at his house. Over the three years, he offered Student 4, Student 5, and Student 6 money and gifts to entice them to give him massages and engage in sexual acts with him. The teacher sexually assaulted Student 5 on at least two occasions when they were 11 and 12 years old. The teacher sexually abused Student 4 on one occasion.

The investigation also established that the teacher engaged in physical, boundary-crossing behavior with other young students at school, such as frequently hugging them and picking them up.

The teacher’s conduct toward Student 1, Student 2, and Student 3 violated CPS’ Comprehensive Non-Discrimination Title IX and Sexual Harassment Policy, which strictly prohibits romantic or sexual conduct between school employees and CPS students.

The teacher’s grooming, touching, and sexual abuse of Student 4 and Student 5 constituted sexual misconduct under CPS’ Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. Additionally, the teacher’s sexual abuse of Student 4, Student 5, and Student 6 constituted several criminal offenses, including predatory criminal sexual assault, aggravated criminal sexual abuse, and child exploitation.

CPD investigated, and the teacher was arrested and charged with predatory criminal sexual assault, aggravated criminal sexual abuse, and child exploitation based on his conduct toward Student 4, Student 5, and Student 6. As of the date of this report, the teacher had four active felony cases pending; the fourth case involves a victim who did not attend CPS.

CPS pulled the teacher from active duty upon receipt of the allegation that he kissed Student 1 on the lips during class.

The OIG recommended termination of the teacher’s CPS employment and placement of a Do Not Hire designation in his personnel file. The OIG additionally recommended that CPS forward the report to the Illinois State Board of Education for review in connection with



revocation proceedings for the teacher's license, which was active (but suspended pending resolution of the criminal charges) at the time of the report. The CPS Law Department filed dismissal charges and notified the OIG that a termination hearing is pending with the Illinois State Board of Education.

» *High School Security Guard Groomed a Student by Sending Them Romantic and Flirtatious Messages, Kissed the Inside of the Student's Wrist, and Made Two Other Students Lift Their Shirts While Performing a Search (20-00158)*

A high school security guard sent romantic and sexually flirtatious communications to an eleventh-grade student. The messages included heart emojis, and telling the student that the security guard loved them and that they were special to the security guard. The security guard also pulled the student from class when they did not respond to her messages and, on another occasion, kissed the student on the inside of their wrist.

The investigation also found that the security guard separately took two other students into a room and asked them to lift their shirts up to their bras while the security guard performed a search on each student. The guard patted one of the students down by placing her hands on the skin on the sides of the student's body and moving her hands down from the student's ribs to their pants line.

The investigation did not find sufficient support for another allegation that the security guard had sex with a different student, and there was insufficient evidence that staff members or the administration at the school knew about and were concealing such an allegation.

The security guard's conduct toward the first student constituted grooming and sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. Additionally, the security guard's conduct violated CPS' Staff Acceptable Use Policy and CPS' Guidelines Maintaining Professional Staff/Student Boundaries.

DCFS initially declined to take the case but later opened an investigation, which was closed due to insufficient evidence of abuse.

CPD opened a battery investigation into the allegations involving the first student but closed the investigation when the student's parent indicated they did not want any further police involvement. CPD opened a sexual exploitation investigation into the allegations that the security guard made two students lift their shirts during a search. The security guard was arrested in relation to the sexual exploitation investigation but was released without charges. CPD suspended both investigations pending additional information.

CPS pulled the security guard from active duty due to the allegations. The security guard was subsequently laid off and a Do Not Hire Pending Investigation designation was placed in her personnel file.



The OIG recommended that CPS enter a permanent Do Not Hire designation in the security guard's personnel file. The Board followed the recommendation.

» *Volunteer High School Wrestling Coach Had Sexual Intercourse with a Student, Beginning When the Student Was 16 Years Old (20-01600)*

A high school volunteer wrestling coach had sexual intercourse with a student, beginning in the student's junior year. While the student did not cooperate in the investigation and the frequency of their sexual interactions is unknown, there was sufficient evidence to determine that the then-22-year-old volunteer first had sexual contact with the student when the student was 16 years old. Their sexual contact was ongoing, and publicly available information obtained by the OIG indicates that their sexual relationship continued after the student's graduation.

Phone records showed that the volunteer and the student communicated extensively and were connected on social media. The OIG also obtained a partially nude photo of the volunteer taken in the student's bedroom. Another student reported seeing Facebook posts in which the student admitted they were dating the volunteer. Additionally, the student's guardian, who ultimately refused to participate in CPD and OIG investigations, initially told CPD that the student was having sexual contact with the volunteer.

The volunteer's actions constituted sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation policy. His actions also violated CPS' Staff Acceptable Use Policy and CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

The OIG also found that the volunteer's misconduct likely would have constituted criminal sexual assault and aggravated criminal sexual abuse.

DCFS and CPD investigated, but both cases were closed due to lack of cooperation from the student and their family.

CPS blocked the volunteer upon receipt of the allegations. A few months later, he was issued a restricted access letter after being seen on the school's campus.

The OIG recommended that the volunteer remain blocked from CPS properties and that a Do Not Hire designation be added to his personnel file in the event he applies for a CPS position or otherwise undergoes a CPS background check. The Board subsequently placed the volunteer on an internal Do Not Hire list.



## D. Cases Involving Other Sexual Misconduct

### » *Charter School Staff Member Groomed a 17-Year-Old Student for Sexual Abuse with Electronic Messages and Phone Calls and Sent the Student an Explicit Text Message Propositioning Sex (22-00247)*

A charter school staff member texted a 17-year-old student an explicit text message that said, “Really I wanna give you some dick but you wanna play.” The OIG reviewed the charter staff member’s phone records and found a total of 31 calls and two text messages between the staff member and the student over a three-month period. Many of the calls occurred at night, and the longest call lasted 26 minutes. The staff member and student also communicated on Snapchat. CPD told the OIG that the student had sent a fully clothed picture of themselves to the staff member on Snapchat, and the staff member responded, “Aw yeah, you look edible in those things.”

If the charter staff member had been a CPS employee, his conduct would have constituted grooming under CPS policy. It also would have constituted sexual misconduct under CPS’ Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. Additionally, the staff member’s conduct would have violated CPS’ Acceptable Use Policy and CPS’ Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS investigated but closed its case as unfounded. CPD also investigated but closed the case because there was no basis for a felony charge, and the student did not want to pursue misdemeanor charges.

The charter staff member was pulled due to the allegations and their employment was terminated by the charter school shortly thereafter.

The OIG recommended that CPS permanently prevent the charter staff member from working for, or volunteering in, the District in the future. Additionally, to the extent that the charter staff member had any other professional licenses, the OIG recommended that those licensing entities be notified about the outcome of this investigation. The Board subsequently placed the charter staff member on an internal Do Not Hire list.

### » *Resident Teacher Sent Sexually Explicit Messages to a High School Student on Instagram and Repeatedly Attempted to Meet with the Student (23-00319)*

An elementary school resident teacher, who was previously employed as a SECA at a high school, messaged a student from their former high school on Instagram. The messages indicated that the resident teacher recognized the student from his time working at the high school, and he was aware that the student was still a current CPS student. In addition to asking the student if he could perform explicit sexual acts on the student, the resident



teacher repeatedly attempted to meet with the student in person and called the student multiple times throughout the night.

The resident teacher's sexual advances constituted prohibited sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. His conduct also violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students as well as CPS' Acceptable Use Policy.

DCFS declined to open an investigation.

CPS pulled the resident teacher from active duty upon receiving the allegations.

The OIG recommended that CPS terminate the resident teacher's employment and add a Do Not Hire designation to his personnel file. The Board followed the recommendations, and also notified the Illinois State Board of Education about the findings in the investigation.

» *CPS Staff Member Sexually Harassed a High School Student Through a Pattern of Inappropriately Intimate Behaviors (20-01429)*

A CPS staff member engaged in a pattern of inappropriately intimate interactions with a high school student. The investigation was initiated by a third-party complaint that was received shortly after the student's graduation; the OIG established that over the course of two years, the staff member had frequent phone communications with the student, engaged with the student on social media, and drove them in his private vehicle. The phone communications were frequent, often long in duration, and sometimes occurred late at night. He also had one-on-one interactions with the student in his office, gave frontal hugs to the student, and singled them out with gifts. The staff member also discussed personal, non-school-related matters with the student.

Additionally, the staff member engaged in a general pattern of fraternization with other students that skirted the appropriate staff-student boundaries.

The OIG found that the staff member's conduct toward the student constituted sexual harassment under the then-existing policies because it was an excessive level of personal attention directed at a particular student and it created an objectively offensive learning environment. While the staff member's conduct toward this student raised grooming concerns, there was insufficient evidence to establish that the conduct was intended to groom the student for sexual abuse, as required by the then-applicable CPS grooming definition.

The staff member's behavior toward the individual student as well as other students also violated CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries, CPS' Staff Acceptable Use Policy, and CPS' Student Travel Policy.

The staff member was pulled from active duty during the investigation.



DCFS declined to open a case.

The OIG recommended appropriate discipline for the staff member, up to and including termination. The Board subsequently filed dismissal charges, and the staff member resigned during the dismissal proceedings. A Do Not Hire designation was added to the staff member's personnel file.

» *High School Security Officer Sent a Student an Image of Himself in a Bathtub (21-01080)*

A high school security officer connected with a tenth-grade student on Snapchat and sent her a photo or a video of himself in a bathtub. At the very least, the image showed the security guard's legs. It was possible that the security guard's penis was visible; however, because the image was not available and given that some inconsistencies existed between the student's initial report and subsequent interviews, the OIG was unable to determine exactly what was shown and whether he sent a photo or a video.

Regardless of what body parts were visible, the security officer's conduct violated CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. He also violated CPS' Staff Acceptable Use Policy and the Standards of Conduct for Maintaining Professional Boundaries Between Staff and Students.

DCFS investigated and closed the case as unfounded.

CPS pulled the security officer from active duty upon receipt of the allegations, and he resigned during the investigation.

The OIG recommended that CPS place a permanent Do Not Hire designation in the security officer's personnel file and take any additional appropriate steps to prevent the security officer from working for, or volunteering in, the District in the future. The Board added a Do Not Hire designation to the security officer's personnel file.

» *Vendor Employee Made a Sexualized Comment to a Seventh-Grade Student About Their "Ass" or "Butt" (22-00807)*

A vendor employee working at a middle school made a sexualized comment to a seventh-grade student. The student walked into the gym and the vendor employee looked at the student and said they had a "big ass butt" (or a "fat ass booty," or some variation of those words). The student's sibling also witnessed the conduct. A few days after the incident was reported, the vendor employee confronted the student about the allegation.

The vendor employee's conduct violated CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy as well as CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS declined to investigate.



The vendor employee was sent home after he confronted the student, and the vendor company subsequently terminated his employment. The vendor company placed an internal Do Not Hire designation in the vendor employee's personnel file. The OIG recommended that CPS take appropriate steps to prevent the vendor employee from working for, or volunteering in, the District in the future. The Board subsequently placed the vendor employee on an internal Do Not Hire list.

» *High School Volunteer Coach Sent Sexually Explicit Photos of His Penis and Other Inappropriate Messages to a Student Athlete, Was Not Approved to Volunteer with CPS (20-01475)*

A volunteer coach, who was also a former high school security officer, sent explicit images and messages to a high school student that he coached. He sent the student photos of his penis and a woman's breasts along with other inappropriate messages. Additionally, he engaged the student in conversations about their dating and sex life.

At the time of the conduct, the volunteer coach was not approved to volunteer at CPS. He was coaching even though CPS had terminated his employment (for previous non-sexual misconduct) and added a Do Not Hire designation to his personnel file the year before. The OIG investigation also established that, when he was a CPS employee, the volunteer coach touched a different student's thigh in a way that made the student uncomfortable. He also engaged in various boundary-crossing behaviors with other students both before and after his employment was terminated, such as socializing with them, communicating with them by cell phone, and inviting them to his home.

The volunteer coach's conduct toward the first student constituted sexual harassment and sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. His conduct also violated CPS' Staff Acceptable Use Policy and CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries. Finally, by continuing to volunteer after his termination, the volunteer coach violated CPS' Volunteer Policy.

Additionally, the high school's administration violated CPS' Volunteer Policy by failing to ensure that the former employee submitted a CPS volunteer application to continue coaching after his employment was terminated (his Do Not Hire status would have rendered him ineligible to volunteer). Because this occurred on a campus with multiple schools that shared athletic teams and coaches, the OIG recommended that the administrators at the schools receive additional training for vetting volunteers.

DCFS declined to investigate.

The volunteer coach (who already had a Do Not Hire designation in his personnel file) was blocked from volunteering with CPS as a result of the allegations.





The OIG recommended that the volunteer coach's Do Not Hire designation and volunteer block remain in place and that CPS take any other appropriate steps to prevent the volunteer coach from working or volunteering anywhere in the District in the future. The Board kept the Do Not Hire designation in place.

» *Charter High School Teacher Groomed and Sexually Harassed a Student and Provided Marijuana to Multiple Students (20-00868)*

A charter high school teacher exchanged a series of text messages with a student, including one inviting the student to stay the night at the charter teacher's house. He also asked the student if they were interested in making money, discussed a secret, and stated that he was "trying to do that mf" (likely propositioning the student to engage in sexual activity with him). He also provided the student with marijuana. Additionally, he drove several other students in his private vehicle, had students over at his residence, and provided students with marijuana and alcohol.

The charter teacher was a former CPS employee who had been terminated four years prior to these allegations with a Do Not Hire designation in his personnel file. Despite this, he was able to obtain teaching positions at two charter schools and worked as a vendor employee.

The charter teacher's conduct toward the student constituted sexual harassment as defined by CPS' Comprehensive Non-Discrimination Title IX and Sexual Harassment policy in place at the time. The misconduct also constituted grooming as defined by CPS' Reporting of Child Abuse, Neglect, and Inappropriate Relations Between Adults and Students Policy. The charter teacher also violated CPS' Staff Acceptable Use Policy, CPS' Student Travel Policy, and CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries.

DCFS investigated the allegations but closed the case as unfounded. CPD also investigated and suspended the case pending the student's cooperation.

The charter school terminated the charter teacher's employment. The OIG recommended that the charter teacher's Do Not Hire designation remain in place and that the District notify the Illinois State Board of Education about the findings in the investigation. The OIG further recommended that CPS determine whether background check protocols were followed by the charter schools and vendor and whether any additional investigation or disciplinary measures are appropriate.

The Board subsequently kept the charter teacher's prior Do Not Hire Designation in place. CPS also confirmed that the charter schools followed the appropriate background check protocols and exercised their authority to hire the charter teacher despite being made aware of the CPS Do Not Hire designation. CPS could not definitively confirm whether the vendor company followed the appropriate background check protocols.



» *Intern for a CPS Vendor Made an Inappropriate Comment to a High School Student and Engaged in Other Concerning Behavior at the School (22-02390)*

An intern for a CPS vendor company engaged in a series of inappropriate acts while interacting with CPS students. The investigation established that the vendor intern told a tenth-grade student that the student had a small penis. This comment was overheard by a staff member and confirmed by the student. On or around that same day, the vendor intern called another student a “bitch” and displayed physical aggression toward the student.

After the vendor intern was banned from the school following these incidents, he repeatedly attempted to enter the school without authorization and had to be escorted off the premises by law enforcement. A school administrator filed a police report against the vendor intern for criminal trespass.

The vendor intern’s comment to the first student constituted sexual misconduct under CPS’ Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. The comment also violated CPS’ Standards for Maintaining Professional Boundaries between Staff and Students.

DCFS declined to investigate.

The vendor intern was not permitted to work at the school following the incidents. Because the vendor intern kept returning to the school grounds, CPS blocked him from all CPS properties during the investigation. The vendor also terminated the intern from their internship program.

The OIG recommended that CPS take appropriate steps to permanently prevent the vendor intern from volunteering in, or working for, the District in the future. The Board subsequently placed the vendor intern on an internal Do Not Hire list.

» *Vendor Photographer Called a High School Student “Sexy” and Touched Their Upper Chest with His Index Finger (22-01944)*

While taking a high school student’s graduation photo, a vendor photographer: (1) touched the student’s upper chest area with his index finger as he said “boop”; (2) made the comment that the student was “sexy as always” as they reviewed the photo; and (3) asked the student for a hug.

The vendor photographer’s comment that the student looked “sexy as always” constituted prohibited sexual misconduct under CPS’ Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. All of the photographer’s conduct toward the student violated CPS’ Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS declined to investigate.



The vendor photographer was blocked by CPS after this incident and the vendor company terminated his employment shortly thereafter.

The OIG recommended that CPS take appropriate steps to prevent the vendor photographer from working for, or volunteering in, the District in the future. The Board placed the vendor photographer on an internal Do Not Hire list.

» *Elementary School SECA Recorded Female Students Without Their Knowledge (21-00424)*

An elementary school SECA recorded female students in the school cafeteria without their knowledge. Although the students were fully clothed, several of the videos focused on the students' chests and buttocks.

A school employee reported finding a USB drive in the school that contained these videos and, while the individual recording them was not visible, the reporting employee believed he heard the SECA's voice in the background. Additionally, in one video a voice says "hi" to the SECA by name, and the person recording the video responds. The SECA was the only staff member with that name at the school. He also had duties in the cafeteria and was present at school on both days the videos were recorded.

The SECA's conduct violated CPS' Comprehensive Non-Discrimination, Title IX, Sexual Harassment and Retaliation Policy. While the videos were not sexually explicit, the focus on the chests and buttocks of exclusively female students demonstrated that the videos were recorded with sexual intent. The SECA also violated CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries.

DCFS was contacted twice and initially declined to investigate. DCFS opened a case after receiving updated information from the OIG, but the case was closed due to insufficient evidence of child exploitation.

CPD opened a case, which was suspended pending victim cooperation.

The SECA was pulled from active duty during the investigation. He resigned shortly thereafter, and a Do Not Hire Pending Investigation designation was added to his personnel file.

The OIG recommended that the Do Not Hire designation be made permanent. Further, because the SECA had a paraprofessional educator license, the OIG also recommended that CPS notify the Illinois State Board of Education about the OIG's findings. The Board subsequently added a Do Not Hire designation to the SECA's personnel file.



» *Charter School Custodian Frequently Stared and Winked at a Sixth-Grade Student; Previous Allegations from Another Charter Student Raised Grooming Concerns (21-01322)*

A charter school custodian frequently stared and winked at a sixth-grade student (“Student 1”) in a way that made the student uncomfortable.

If the charter custodian were a CPS employee, his pattern of staring and winking at Student 1 would have constituted prohibited sexual misconduct under CPS’ Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. The conduct also would have violated CPS’ Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

Additionally, during the investigation, new evidence came to light that caused the OIG to substantiate allegations against the custodian that were reported by another student three years prior. In those allegations, a then-eighth-grade student (“Student 2”) at a different school within the same charter network reported that the custodian made them uncomfortable by showing them personal attention, giving them an inappropriate note, and gifting them a rosary. At the time, the charter network investigated and established that the custodian gave Student 2 the gift but found there was insufficient evidence to determine whether he gave Student 2 the note. The charter network transferred the custodian to a new school (Student 1’s school) because of that investigation.

After Student 1 reported the staring allegations, the OIG was informed that the custodian sent Student 2, who had just graduated high school, a 10-page letter. Although the OIG was unable to obtain a copy of the letter, the custodian admitted to the OIG that he sent it and described the letter as an apology for what had occurred when Student 2 was in eighth grade. However, Student 2 filed a police report and described the letter as a confession of continuing love that included various details about Student 2’s life that the custodian had no reason to know. Regardless of which description is accurate, the custodian’s conduct in sending the letter made it more likely than not that Student 2’s initial allegations were true.

Although grooming was not specifically defined under CPS policies in effect at the time and the OIG was unable to interview Student 2 or obtain a copy of the note or the letter, the custodian’s conduct directed at Student 2 raised significant grooming concerns.

DCFS was contacted regarding the staring allegations by Student 1 and the allegation that the custodian sent the 10-page letter to Student 2. DCFS declined to take either case. According to the charter network, DCFS investigated Student 2’s initial allegations against the custodian when they were first reported; however, the OIG was unable to obtain information relating to that investigation.

CPD investigated the allegation that the custodian sent the 10-page letter to Student 2 and closed the case as non-criminal.



The custodian was pulled from the charter school after the OIG received the allegation that he sent the 10-page letter to Student 2. His employment was terminated shortly thereafter.

The OIG recommended that CPS take appropriate steps to permanently prevent the charter custodian from working for, or volunteering in, the District in the future. In response to the OIG's report, the charter network placed the custodian on its "Ineligibility for Rehire" list. The Board also placed the charter custodian on an internal Do Not Hire List.

» ***High School Teacher Made an Inappropriate Comment to a Student and Made Two Other Students Uncomfortable by Touching Their Shoulders (23-00343)***

On senior picture day, a high school teacher made a comment to a twelfth-grade student to the effect of, "If you dress like this every day, come to my class and you'll get an A." The teacher also made two other students uncomfortable by briefly touching their shoulders with his hand and his pencil even after they asked him to stop.

The teacher's comment to the first student constituted prohibited sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. The teacher's persistent touching of the two students' shoulders violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS investigated the picture day comment but closed its investigation as unfounded because the student's family did not want to participate. DCFS did not investigate the shoulder touching allegations.

The teacher was the subject of a previous OIG investigation after he allegedly looked a student up and down and said "Ohhh weeee." The OIG referred that case to CPS and recommended that the teacher receive corrective action training, but CPS' records showed that he failed to attend the training.

The teacher retired from CPS during the investigation.

The OIG recommended that CPS place a Do Not Hire Designation in the teacher's personnel file based on his conduct and his refusal to attend corrective action training. The Board followed the recommendation.

» ***High School Charter Staff Member Made Sexual Advances Toward a Twelfth-Grade Student (22-02243)***

A staff member at a charter high school made sexual advances toward a twelfth-grade student. The staff member talked to the student about his own dating relationship, told the student that he was looking for a "fuck buddy," and asked if the student liked older men. He then asked the student to meet with him outside of school to smoke and told the student, "Whatever happens, happens." The staff member also attempted to connect with



the student on Instagram on two occasions. The staff member's behavior made the student uncomfortable to the point they stayed home from school for two days to avoid him.

If the charter staff member had been a CPS employee at the time, his sexual advances toward the student would have constituted prohibited sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. His conduct also would have violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students and CPS' Acceptable Use Policy.

DCFS declined to investigate.

The charter staff member was pulled from the charter school shortly after the allegations were received, and he resigned during the investigation. The staff member previously worked for CPS, and a Do Not Hire Pending Investigation designation was added to his personnel file.

The OIG recommended that CPS add a permanent Do Not Hire designation to the charter staff member's personnel file and take any additional appropriate steps to prevent the charter staff member from working for, or volunteering in, the District in the future. The Board added a permanent Do Not Hire designation to the staff member's personnel file.

» ***Charter Staff Member Touched a Sixth-Grade Student on Their Buttocks (21-01258)***

A charter school staff member touched a sixth-grade student's buttocks over their clothes and made a comment to the effect that he would "do it again if [he] want[s]." The student reported the incident approximately three years later, after encountering the staff member again when he began working at the charter school where the student had transferred. The incident was sufficiently corroborated by records from the first charter school.

If the charter staff member were a CPS employee at the time, his conduct would have violated CPS' Comprehensive Non-Discrimination, Title IX, and Sexual Harassment Policy as well as CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries.

DCFS investigated and closed its investigation with a finding of insufficient evidence. CPD investigated and concluded that the alleged incident constituted non-sexual battery, but the statute of limitations had passed.

By the time the allegation was reported, the charter staff member was also a CPS employee and was on a leave of absence. The staff member was pulled from active duty at the second charter school as a result of the allegations, and the second charter school terminated his employment during the investigation.



If the charter staff member were a CPS employee at the time of the conduct, the OIG would have recommended appropriate discipline up to and including termination and the addition of a Do Not Hire designation to his personnel file.

CPS terminated the staff member's CPS employment after his leave of absence expired. The Board subsequently added a Do Not Hire designation to his personnel file.

» *Charter High School Staff Member Contacted a Student on Instagram and Attempted to Pursue Them (22-00815)*

A staff member at a charter high school contacted a twelfth-grade student on Instagram and attempted to pursue them sexually or romantically. The charter staff member asked the student if they were 18, told the student that he wanted to talk to them, and expressed disappointment when they did not seem interested. When the student told the charter staff member that he was going to "catch a damn case," he responded by saying that he wasn't much older than the student (as though to imply that his conduct in pursuing them was not inappropriate).

Had he been a CPS employee, the charter staff member's messages to the student would have constituted prohibited sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. His conduct also would have violated CPS' Staff Acceptable Use Policy and CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

The investigation also established that the charter school allowed the charter staff member to work at the school and interact with students without completing a CPS background check, in violation of the Background Check and Adjudication Process Agreements in place between the District and charter networks.

DCFS declined to investigate.

The charter staff member was pulled from active duty after the allegations were received, and the charter school terminated his employment shortly thereafter.

The OIG recommended that CPS take appropriate steps to ensure that the charter staff member is permanently prevented from working for, or volunteering in, the District in the future. The OIG also recommended that CPS' Office of Innovation and Incubation review the charter school's policies for performing background checks to ensure they comply with the charter network's Background Check and Adjudication Process Agreement with the District.

The Board placed the charter staff member on an internal Do Not Hire list. CPS reminded the charter network of its obligation to comply with the contractual requirements relating to background checks.



» *High School Substitute Teacher Made Grossly Inappropriate Remarks About His Sex Life to Students (23-00603)*

A high school substitute teacher made grossly inappropriate remarks about his sex life to students during class. Videos recorded by students show the substitute teacher talking about his own sexual experiences, including how he had sex with a judge in her chambers, and how he once had sex with a woman as she was tied to a ceiling fan. While not recorded, a student also credibly disclosed that the substitute teacher talked about losing his virginity at age five to a six-year-old child.

The substitute teacher's comments constituted prohibited sexual misconduct under CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. His conduct also violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS investigated and unfounded the case because it could not determine that the substitute teacher made the comments for the purpose of sexual gratification.

CPD investigated and closed its case after the student designated as the victim declined to pursue charges.

CPS pulled the substitute teacher from active duty upon receiving the allegations.

The OIG recommended that CPS terminate the substitute teacher's employment and add a Do Not Hire designation to his personnel file. The Board followed the recommendation.





## E. Cases Investigated Under Title IX Regulations

When CPS' Title IX Coordinator designates a case as falling under Title IX, federal regulations mandate certain substantive and procedural requirements. The Title IX regulations were revised in 2020 and again in 2024; each iteration requires the OIG to follow different procedures.

The following cases were investigated under the 2020 Title IX regulations, which separate the fact-finding and ultimate decision-making functions. As such, the OIG's role is limited to the fact-finding investigator. At the conclusion of the investigation, the OIG issues an investigative report to the parties and to a Title IX decision-maker, who is appointed by CPS' Office of Student Protections and Title IX. The OIG's investigative report contains an independent assessment of the evidence but no factual or policy findings. The decision-maker reviews the evidence, fields any additional questions or requests from the parties, and issues a final written determination based on the evidence. Although the decision-maker considers the OIG's assessment of the evidence when deciding the matter, it is not binding on the decision-maker.

### » *High School Security Guard Sexually Assaulted One Student and Sexually Abused a Second Student (21-01342)*

A security guard sexually assaulted a student ("Student 1") on multiple occasions in the high school. He offered Student 1 protection from bullies in exchange for oral sex, and the two performed oral sex on each other multiple times. The security guard also kissed, fondled, and attempted to anally penetrate Student 1. The two exchanged sexual communications via texts and phone calls.

The security guard also sexually abused another student ("Student 2"). He asked how many people had performed oral sex on them. He also told Student 2 to raise their shirt, and he touched the student's bare chest and groped their genitals over their clothing.

DCFS investigated both allegations and found credible evidence of abuse in both cases.

CPD investigated both allegations and arrested the security guard. He pled guilty to criminal sexual assault against Student 1 and was sentenced to eight years' imprisonment. He also pleaded guilty to aggravated criminal sexual abuse against Student 2 and was sentenced to three years' imprisonment. The security guard is currently incarcerated and serving those sentences.

CPS pulled the security guard from active duty shortly after the OIG's investigation was opened.

The OIG investigated this case under Title IX regulations and sent a report of its factual summary and assessment to the Title IX decision-maker. The decision-maker found that the security guard committed forcible rape, forcible sodomy, and forcible fondling against



Student 1 and forcible fondling against Student 2 in violation of CPS' Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation policy. The decision-maker further found that the security guard's conduct implicated CPS' Staff Acceptable Use Policy and CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

The decision-maker recommended that CPS terminate the security guard's employment. The Board terminated the security guard and added a Do Not Hire designation to his personnel file.

» *Charter High School Teacher Sent Sexual Communications to a Student, Engaged in Physical Contact of a Sexual Nature with the Student, and Solicited the Student to Meet Him Outside of School (22-01982)*

A charter high school teacher sent sexual communications to a student via Snapchat over the span of several months. In these messages, the charter teacher called the student "baby" and sent a nude video of himself in the shower. The charter teacher also engaged in physical contact of a sexual nature with the student, including touching the student's breast and leg, and he attempted to persuade the student to meet with him outside of school to engage in sexual acts.

DCFS was contacted but declined to investigate because the student was over the age of 18.

CPD investigated the allegations, and the charter teacher was arrested and charged with two counts of aggravated criminal sexual abuse, one count of aggravated battery, and one count of manufacturing harmful material. The aggravated battery charge was amended to a misdemeanor, to which the charter teacher pled guilty. The state declined to prosecute the remaining charges. The charter teacher was sentenced to two years' probation, 30 hours of community service, and completion of a sex offender evaluation.

The charter teacher was pulled from active duty after the complaint was received. Within a week of his removal, the charter school notified the OIG that he had resigned and found employment at another school. The OIG determined that the teacher was working at a CPS school and CPS pulled the teacher from active duty that same day.

The OIG investigated this case under Title IX regulations and sent a report of its factual summary and assessment to the Title IX decision-maker with the note that, because the charter teacher was a licensed teacher, depending on the final disposition of the investigation, notification by CPS to the Illinois State Board of Education may be appropriate and/or required.

The decision-maker found that the teacher sexually harassed the student, both in person and through social media, in violation of Title IX. The decision-maker further found that the teacher intentionally engaged in sexualized physical contact with the student on school property.



The decision-maker recommended that CPS terminate the teacher's employment and add a Do Not Hire designation to his personnel file. Further, the decision-maker stated that the District should notify the Illinois State Board of Education for further action. The teacher appealed the determination, but the appeal was rejected by the appeals decision-maker. CPS terminated the teacher's employment and added a Do Not Hire designation to his personnel file.

» *High School Teacher Engaged in Sexualized Contact with a Student, Engaged in Impermissible Behavior with Multiple Other Students, and Confronted Students After They Reported His Conduct (21-01229; 22-01704)*

An OIG investigation found that a high school teacher engaged in impermissible boundary-crossing behavior with at least five female students. The teacher engaged in sexualized contact with one student ("Student 1"), which included touching her hand, hugging her in a sexual manner, and making explicitly sexual comments to her. He told another student ("Student 2") that he would have a personal relationship with her if they were the same age.

The teacher also engaged in a pattern of physical contact with other female students, such as stroking their arms, rubbing their hands, and invading their personal space. He made comments about the physical appearance of female students and engaged in a pattern of having private, one-on-one interactions with female students, with no clear academic or extracurricular purpose.

The OIG's investigation also determined that after the conduct was reported, the teacher engaged in a general pattern of intimidation. He confronted the complainants and their parents and classmates to deter reports of his alleged sexual misconduct. He also discussed the allegations against him in class, criticized the complainants for reporting his conduct, and discouraged others from doing so.

DCFS was notified about four separate sets of allegations during the OIG investigation. DCFS investigated the allegations that the teacher made physical contact of a sexual nature with Student 1 and engaged in boundary-crossing behaviors with other students. Both investigations were unfounded due to insufficient evidence. DCFS declined to investigate the comment to Student 2 or an allegation that the teacher touched a student's arm inappropriately.

CPD investigated the same allegations as DCFS and suspended both cases.

The teacher was pulled from active duty during the investigation.

The OIG investigated this case under Title IX regulations and sent a report of its factual summary and assessment to the decision-maker. The decision-maker did not agree with the OIG's findings and determined that the evidence against the teacher was not sufficiently credible and/or corroborated; thus, according to the decision-maker, there was insufficient evidence that the teacher committed any violation of CPS policy.



The final disposition of this matter remains pending.

» *Elementary School Teacher Made Sexualized Comments to Students (21-00948)*

An elementary school teacher commented on the physical appearance of a seventh-grade student (“Student 1”) and made a remark about dating them. The teacher also gave Student 1 a frontal hug on at least one occasion when they were alone in a classroom. Additionally, the teacher talked to Student 1 and another student (“Student 2”) about students engaging in sex acts behind a school stairwell. After his conduct was reported, the teacher contacted parents and staff members about the allegations made against him.

DCFS investigated and closed its case as unfounded because Student 1 did not make a disclosure of sexual exploitation.

CPD investigated and arrested the teacher. He was charged with misdemeanor battery and was found not guilty after a bench trial.

CPS pulled the teacher from active duty upon receipt of the allegations.

The OIG investigated this case under Title IX regulations and sent a report of its factual summary and assessment to the decision-maker. The decision-maker found that the teacher’s conduct toward Student 1 was severe, pervasive, and objectively offensive, and constituted sexual harassment under CPS’ Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. The decision-maker also found that the teacher’s actions constituted grooming under CPS policy.

The decision-maker recommended that the teacher be terminated and that a Do Not Hire designation be added to his personnel file.

The teacher appealed the determination, but the appeal was rejected by the appeals decision-maker.

The final disposition of this matter remains pending.

» *Elementary School Teacher Engaged in Inappropriate Physical Contact with Students, but the Contact Was Not Clearly Sexual (22-00661)*

An elementary school teacher engaged in inappropriate physical contact with students, but the evidence was inconclusive as to whether the contact was sexually motivated.

The teacher touched female students’ shoulders, collarbone area, hands, arms, and waists. He also tapped students’ bodies with a yardstick on multiple occasions, and accidentally tapped a female student’s buttocks with the yardstick. A substantial number of female students reported this conduct and stated they were uncomfortable with it, though they also generally spoke about the teacher in a positive manner. There was insufficient evidence that the teacher intentionally touched any student on their breast, thigh, or groin area.



Additionally, because the teacher also made physical contact with male students, there was insufficient evidence that his conduct was based on sex.

The teacher also made two inappropriate comments to a student. He told the student they were his favorite and said some variation of “I love you” to them, but there was insufficient evidence that these comments were romantic or sexual in nature. Finally, while the teacher gave leftover snacks to another student and told them not to tell other students, there was insufficient evidence that he consistently exhibited favoritism toward the student.

DCFS investigated the allegations and closed the case as unfounded. CPD also investigated and closed the case because the students did not disclose any touching of a sexual nature.

CPS pulled the teacher from active duty upon receipt of the allegations.

The OIG investigated this case under Title IX regulations and sent a report of its factual summary and assessment to the Title IX decision-maker. The decision-maker found that the teacher did not violate CPS’ Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy. However, the decision-maker found that the teacher’s conduct did violate CPS’ Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

The decision-maker recommended that the CPS Law Department review this matter and issue appropriate discipline. If the teacher is reinstated to the elementary school, and any of the students involved remain at the school, the decision-maker recommended that a safety plan be implemented to ensure that the teacher is not the assigned teacher for any of those students.

The final disposition of this matter remains pending.



## F. Cases Involving Non-Sexual Policy and Guideline Violations

The substantiated policy violations in the following OIG SAU investigations do not include findings of sexual misconduct. Instead, they identify violations of other adjacent policies that have been enacted or expanded by the District over the last several years to provide guidance for maintaining professional boundaries and to deter behavior that may lead to more serious misconduct. These include the following policies (and the predecessor policies):

- The [\*\*Standards of Conduct for Maintaining Professional Boundaries Between Staff and Students\*\*](#) (formerly known as the Guidelines Regarding Maintaining Professional Staff/Student Boundaries) define appropriate and reasonable boundaries between staff members and students.
- The [\*\*Staff Acceptable Use Policy\*\*](#) concerns the proper use of CPS resources and the permitted scope of electronic communications with students. [CPS Policy Manual, Section 604.1, Board Report 19-0828-PO3 (August 28, 2019)]
- The [\*\*Student Travel Policy\*\*](#) prohibits a staff member from driving a student in their personal vehicle without advance written consent from the principal and the student's parent/guardian. [CPS Policy Manual, Section 604.3, Board Report 21-0922-PO2 (September 22, 2021)]
- The [\*\*Reporting of Child Abuse, Neglect, and Inappropriate Relations Between Adults and Students Policy\*\*](#) governs the proper reporting of suspected abuse and neglect, as well as potential grooming behaviors. The Policy also requires staff members to keep such allegations confidential and to cooperate with OIG investigations. [CPS Policy Manual, Section 511.1, Board Report 22-0622-PO2 (June 22, 2022)]

The SAU initiated these investigations after receiving a complaint from students, colleagues, parents, anonymous individuals, or other witnesses. In some instances, the initial complaint received articulated a clear allegation of sexual misconduct that was not ultimately substantiated, but the investigation determined that the staff member violated one of these adjacent policies. In other instances, the initial allegation on its face may have presented concerns of grooming or other concerning misconduct, such that further investigation was appropriate.

Potential grooming behaviors do not automatically constitute a violation of CPS policies. In fact, one of the reasons grooming for sexual abuse is so insidious is that the conduct in question may resemble the genuine concern that staff members have for the development or well-being of their students. However, as demonstrated by many of the substantiated findings summarized below, the conduct may violate other CPS policies, such as the Standards of Conduct for Maintaining Professional Boundaries between Staff and Students, the Staff Acceptable Use Policy, and/or the Student Travel Policy.



Finally, the substantiated findings summarized below also reflect SAU findings pertaining to staff members who fail to report suspected sexual misconduct in violation of their mandated reporter obligations and/or CPS policy. Staff members also occasionally violate the Board Rules by failing to cooperate with an OIG investigation. The SAU investigates and recommends consequences for these policy violations in order to deter such behavior and keep students safe.

» *Elementary School Classroom Assistant/Cheerleading Coach Engaged in Unprofessional Play with Female Students During Recess and Measured a Student for Their Cheerleading Uniform (22-00207)*

An elementary school classroom assistant, who was also the cheerleading coach, engaged in unprofessional conduct with female students during recess, including lifting them up, spinning them around, and holding their hands. He also measured at least one student for their cheerleading uniform, which made the student uncomfortable because he put the measuring tape on the student's chest and touched their breast with his thumb while doing so.

The classroom assistant's conduct violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students; however, the investigation found no evidence of sexual motivation or intent. Additionally, with respect to measuring students for uniforms, the OIG recognized two mitigating factors: the classroom assistant's conduct was related to his job duties, and he had given parents notice that their children's measurements would be taken at school unless the parents provided him with the measurements themselves.

DCFS was contacted but declined to investigate.

CPS pulled the classroom assistant from active duty upon receiving the allegations. Prior to the OIG's report being issued, the OIG recommended that the classroom assistant be reinstated. He subsequently returned to active duty before the report was issued.

The OIG recommended appropriate action for the classroom assistant, including additional training on the Standards of Conduct. The OIG also recommended that the elementary school examine its policies and procedures relating to measuring students' bodies for uniforms. The Board subsequently placed the classroom assistant on a Level One Performance Improvement Plan and required him to complete training.

» *High School Physical Education Teacher Stared at Female Students' Chests and Buttocks (21-01110)*

A high school physical education teacher stared at the chests and buttocks of female students in a way that made the students uncomfortable. Two students reported that the teacher stared at their or another student's chest, and three students reported that they saw the teacher stare at students' buttocks. More students came forward with similar complaints



during the OIG's investigation. Some students adjusted their behavior (such as by skipping class or wearing a sweater) to prevent or avoid further staring.

The gym teacher's job required him to watch students as they exercised, and distinguishing appropriate observation from inappropriate staring can be difficult. However, based on the large number of student reports, the OIG determined that the teacher's actions violated CPS policy.

The teacher was the subject of two previous OIG investigations, one of which included allegations of inappropriate staring. Although the allegations in that case were unsubstantiated, the OIG recommended that the teacher receive training on CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students due to students feeling uncomfortable with how he looked at them. However, there was no record that such training had been administered.

DCFS was contacted but declined to investigate.

The teacher's conduct violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students. The OIG recommended appropriate discipline for the teacher, including training on the Standards of Conduct. The Board subsequently terminated the teacher's employment and added a Do Not Hire designation to his personnel file.

» ***Charter School Paraprofessional Connected and Communicated with a High School Student via Snapchat (22-00905)***

A paraprofessional at a charter high school gave a student access to his phone in order for the student to install Snapchat on the phone. The paraprofessional then sent at least one message to that student via Snapchat.

There was insufficient evidence to substantiate an allegation that the charter paraprofessional sent the student a picture of himself without a shirt on that contained a "Friendmoji" depicting himself and the student along with a caption that read "Love You [Student Name]." Although the OIG obtained the picture in question, the paraprofessional denied sending the photo to the student and denied that he added the text or the "Friendmoji." Furthermore, the student made inconsistent statements about how they obtained the picture.

Had the charter paraprofessional been a CPS employee, his conduct would have violated CPS' Staff Acceptable Use Policy and CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS was contacted but declined to investigate.





If the charter paraprofessional had been a CPS employee, the OIG would have recommended appropriate discipline. The OIG received information that the charter school entered into a disciplinary agreement with the paraprofessional.

» *High School Security Guard/Coach Took a Student on Two College Football Recruiting Visits Out of State (22-00697)*

A high school security guard, who was also the coach of the football team, took a student on two college football recruiting visits in another state. Although both the coach and the student said that the student's parents gave verbal consent for the trips, the coach did not obtain written consent for either trip. There was no allegation or evidence that the security guard engaged in sexual misconduct or acted inappropriately with the student at any time.

Additionally, the investigation found that the coach communicated with multiple students via cell phone and personal emails; however, there was no evidence that these communications were related to anything other than football.

The coach's conduct violated CPS' Student Travel Policy, which requires written permission from a student's parents and the principal for trips associated with extracurricular activities. The coach also violated CPS' Staff Acceptable Use Policy.

DCFS was notified but declined to investigate.

The OIG recommended appropriate discipline for the coach, including training on the Travel Policy and Staff Acceptable Use Policy. The Board subsequently placed the coach on a five-day suspension.

» *High-Ranking CPS Staff Member Failed to Report Allegations of Sexual Misconduct at a High School (20-01338)*

A CPS teacher emailed a high-ranking CPS staff member with a whistleblower complaint containing several allegations of sexual misconduct against teachers and staff members at the teacher's school. The teacher directed the allegations to the high-ranking staff member instead of the school's principal due to concerns that the principal was ignoring or covering up the misconduct and may have been involved in misconduct himself.

The high-ranking staff member admitted that he took no action in response to the teacher's email. His conduct violated CPS' Reporting of Child Abuse, Neglect and Inappropriate Relations Between Adults and Students Policy.

There was insufficient evidence that the principal committed any misconduct or that he ignored or concealed any staff-on-student misconduct

DCFS declined to investigate allegations related to the principal.



The OIG recommended appropriate discipline for the high-ranking staff member, including additional training on his duty to report allegations of sexual misconduct. The OIG also recommended that the Office of Student Protections and Title IX consider whether to provide school administrators or staff with additional training regarding reporting obligations. The Board subsequently placed the high-ranking staff member on a two-day suspension.

» *Unapproved Volunteer Gave a High School Student an Inappropriate Note, and a Second Volunteer Violated Her Reporting Obligations and Failed to Cooperate with the OIG (23-00276)*

A CPS volunteer gave an inappropriate handwritten note to a high school student. The note purported to be an award for “best looking high heel shoes in the entire courthouse,” and requested the student’s personal phone number so they could discuss another award that included a “prize.” The note did not contain anything sexually explicit and there was insufficient evidence that the note was intended to groom the student.

While the principal stated that she and the school clerk completed annual checks to ensure volunteers were approved, the volunteer in question was never approved. He had applied three years prior to this incident but failed to complete the required steps to become an approved volunteer.

The student reported this handwritten note to a second CPS volunteer, who relayed the complaint to the school counselor. The second volunteer did not report the conduct to DCFS, was unfamiliar with DCFS as an organization, and believed she had fulfilled her reporting obligations by speaking to the counselor. The second volunteer also refused to share the student’s name or the contents of the note with the OIG, even after being reminded of her obligation to cooperate with OIG investigations and directed to the applicable policies for her to review.

The first volunteer violated CPS’ Standards of Conduct for Maintaining Professional Boundaries Between Staff and Students. The principal violated CPS’ Volunteer Policy by failing to confirm the volunteer’s approval status.

By failing to meet her reporting obligations and refusing to cooperate with the investigation, the second volunteer violated CPS’ Reporting of Child Abuse, Neglect and Inappropriate Relations Between Adults and Students Policy and CPS’ Comprehensive Non-Discrimination, Harassment, Sexual Harassment, Sexual Misconduct and Retaliation Policy.

The first volunteer stopped volunteering as a result of the allegations. The second volunteer was blocked by CPS during the OIG’s investigation due to her failure to cooperate with the OIG and fulfill her obligations under CPS policy.

The OIG recommended that, if the first volunteer seeks to be a volunteer again, he be required to undergo training on the Standards of Conduct for Maintaining Professional



Boundaries Between Staff and Students. The OIG also recommended that the principal and school clerk receive training on CPS' Volunteer Policy.

Additionally, the OIG recommended that CPS determine whether to lift the block on the second volunteer's volunteer status. If she is permitted to volunteer again, the OIG recommended that she first receive training on the Reporting Policy and the Non-Discrimination Policy. Further, given her demonstrated disregard for her CPS policy obligations, the OIG also recommended that she sign a written certification that she understands her obligations and would fully comply with them in the future.

Finally, the OIG recommended that CPS consider requiring all Level I volunteers to complete training concerning appropriate interactions with students, their reporting obligations under CPS policy and state law, and their obligations to fully cooperate with District investigators and DCFS.

The Board placed both volunteers on an internal Do Not Hire list. The Board has since amended CPS' Volunteer Policy to explicitly require all prospective Level I and II volunteers to complete mandatory trainings before they are permitted to work with CPS students.<sup>20</sup>

» *Vendor Staff Member Viewed Pornography on His Cell Phone While in an Elementary School Computer Room (22-01793)*

A vendor staff member viewed pornography on his cell phone while in an elementary school computer room. A teacher at the school noticed a group of giggling students gathered outside the glass door to the computer room; she then looked inside and saw the vendor staff member sitting in the room and fast-forwarding through different scenes of a pornographic video on his phone. Though the vendor staff member claimed he was watching an Instagram story of a friend "twerking" in a bathing suit, the pornographic material was plainly visible from the hallway.

Had the vendor staff member been a CPS employee, his conduct would have violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS was contacted but declined to investigate.

CPS blocked the vendor staff member from CPS properties upon receipt of the allegations.

The OIG recommended that the vendor staff member remain blocked from CPS properties and that a Do Not Hire designation be added to his personnel file in the event that he ever applies for a CPS position or otherwise undergoes a CPS background check. The Board followed each of the recommendations.

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<sup>20</sup> In December 2024, the Office of Student Protections and Title IX informed the OIG that CPS is working to create a widely accessible training system for volunteers and that the process is ongoing.



» *Elementary School Substitute Teacher Made a Student Uncomfortable with Ambiguous Comments (20-00579)*

An elementary school substitute teacher described or referred to a student as “thick and bouncy” or “big and bouncy.” After that same student asked him if they could go to the bathroom, the substitute teacher winked at the student and told them that he would be “watching” them. These comments made the student uncomfortable.

The substitute teacher also instructed students to call him by the nickname “T-Bone.”

There were additional allegations that the substitute teacher made a sexually ambiguous comment to a second student and that he stared at and tried to get physically close to female students, but the investigation did not substantiate these allegations.

DCFS was contacted but declined to investigate.

The substitute teacher’s conduct violated CPS’ Guidelines Regarding Maintaining Professional Staff/Student Boundaries.

CPS blocked the substitute teacher upon receipt of the allegations.

The OIG recommended that CPS consider whether to lift the block on the substitute teacher, and, if the block is lifted, that the substitute receive appropriate discipline, as well as additional training or coaching on CPS’ Standards of Conduct for Maintaining Professional Boundaries between Staff and Students prior to interacting with students again. The Board terminated the substitute teacher and added a Do Not Hire designation to his personnel file.

» *High School Special Education Teacher Made Gratuitous Physical Contact with Multiple Students and Commented on a Student’s Body (21-01325)*

A high school special education teacher engaged in a pattern of conduct that made students uncomfortable. The investigation established that he made gratuitous physical contact with multiple students, mainly by touching their shoulders and arms, and stood in close proximity to at least two students while assisting them in the classroom. He also told a student that they should join the dance team because they had a “dancer’s body,” and asked two other students whether certain pictures on their phones were of their significant others.

The special education teacher’s conduct violated CPS’ Standards of Conduct for Maintaining Professional Boundaries between Staff and Students. However, there was no evidence that he engaged in any of this conduct for a sexual or prohibited purpose.

DCFS investigated and closed its investigation as unfounded.

CPS pulled the special education teacher from active duty upon receipt of the allegations, and he was reinstated during the investigation.



The OIG recommended that the special education teacher receive appropriate discipline. If he had not already received corrective action training on maintaining appropriate boundaries with students upon his reinstatement, the OIG also recommended that he receive this training. The Board placed the special education teacher on a Level Two Performance Improvement Plan.

» ***High School Security Guard Commented on Female Students' Physical Appearance and Stared at Them (19-00573)***

The OIG investigation established that, over a four-year period, a high school security guard engaged in a pattern of making inappropriate comments to female students, usually about their physical appearance. His comments made those students and other onlookers feel uncomfortable. While not explicitly sexual, the comments were ambiguous and unprofessional in nature; for example, he reportedly told a student that she had “put on some weight.”

The investigation also established that, over the same four-year period, the security guard stared at female students in a manner that made them uncomfortable.

The security guard’s conduct violated CPS’ Guidelines Regarding Maintaining Professional Staff/Student Boundaries.

DCFS did not investigate the allegations in this case.

At the time of the investigation, the security guard was on a leave of absence unrelated to the allegations.

The OIG recommended appropriate discipline for the security guard, including additional training regarding appropriate staff-student interactions should he return from his leave of absence. The Board placed the security guard on a five-day suspension.

» ***High School Teacher Made an Inappropriate Comment with a Sexual Connotation to a Student, Made Unprofessional Jokes During Class, and Engaged in Overly Familiar Interactions with Certain Students (21-01320)***

A high school teacher made an inappropriate comment to a student about how they had sucked on a piece of candy in the hallway. The comment clearly had a sexual connotation about oral sex. The teacher also engaged in a pattern of making unprofessional jokes to students during class and asked students about their dating preferences or relationships. The investigation also established that the teacher physically comforted a crying student in a way that other students thought was strange. Finally, the teacher engaged in overly familiar interactions with a particular group of female students, allowing them to sit on his desk and talk to him about their problems between class periods.

There was insufficient evidence to corroborate one student’s account that the teacher grabbed their stomach in class twice, told them that “69” was his favorite position, told them



that another student wanted to kiss them, and stood unnecessarily close to them on one occasion. There was also insufficient evidence to corroborate other second-hand allegations of boundary-crossing behaviors by the teacher.

The teacher's behavior violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students. However, there was insufficient evidence that any of the teacher's conduct constituted sexual harassment or misconduct, as defined by CPS policy.

The investigation also established that an assistant principal failed to promptly document the complaint about the candy-sucking comment as required by CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS investigated the allegations of the student who alleged the teacher grabbed their stomach and joked about the "69" position, but found there was insufficient evidence to support the allegations. CPD documented these allegations but did not investigate. DCFS was also contacted regarding the candy-sucking comment but declined to investigate.

CPS pulled the teacher from active duty after the allegations were reported.

The OIG recommended appropriate discipline for the teacher, including a determination of whether to reinstate him to active duty. If he is reinstated, the OIG recommended that he first receive additional training on maintaining appropriate boundaries with students.

The OIG also recommended additional training for the assistant principal on CPS' Reporting Policies.

Finally, the OIG referred several non-sexual allegations to CPS for any appropriate action or further investigation.

The Board subsequently reinstated the teacher, placed him on a Level Three Performance Improvement Plan, and required him to complete additional training. The assistant principal was given a verbal reprimand.

» *Elementary School Teacher Engaged in Boundary-Crossing Comments and Behaviors with Students (20-00247)*

An elementary school teacher made several boundary-crossing comments to and about students, including: telling a student they should go on a field trip because there would be boys there, implying that the student could flirt with the boys; making comments about both male and female students' appearances; asking students about their dating relationships; and making a comment to another teacher about a student's "boobs . . . hanging out the top" of their outfit.

There was insufficient evidence to substantiate other allegations against the teacher, including that he took inappropriate pictures of students who he thought were dressed



provocatively or that he told another staff member that he would “get in trouble” with girls if he worked in a high school setting.

The teacher’s interactions with students violated CPS’ Guidelines Regarding Maintaining Professional Staff/Student Boundaries.

DCFS was notified but declined to investigate.

The teacher resigned from CPS during the OIG’s investigation.

The OIG recommended that CPS flag the teacher’s personnel file for consideration of this investigation’s findings in the event that he applies for a position within the District or is otherwise subject to a CPS background check. The Board added a Do Not Hire designation to the teacher’s personnel file.

» *Vendor Custodian at a Charter High School Engaged in Prohibited Cell Phone Communications with an Eleventh-Grade Student (20-00687)*

A vendor custodian at a charter high school had prohibited cell phone communications with an eleventh-grade student. On one occasion, the vendor custodian and student exchanged 26 text messages after midnight.

However, there was insufficient evidence to substantiate allegations that the vendor custodian once went to the student’s house and kissed them or that the vendor custodian asked the student if they would have sex with him when they were older.

Had the charter vendor custodian been a CPS employee, his conduct would have violated CPS’ Staff Acceptable Use Policy and CPS’ Guidelines Regarding Maintaining Professional Staff/Student Boundaries.

DCFS was contacted but initially declined to open an investigation. After the student alleged that the vendor custodian had kissed them, DCFS was contacted again and opened an investigation. That investigation found insufficient evidence of sexual exploitation or sexual molestation.

CPD opened an investigation but closed it due to the student’s lack of cooperation.

The vendor custodian was pulled from active duty during the OIG’s investigation and was terminated by the vendor company five months later. The vendor custodian did not respond to the OIG’s multiple attempts to interview him.

Given the vendor custodian’s misconduct and his refusal to cooperate with the OIG’s investigation, the OIG recommended that CPS take appropriate steps to permanently prevent the vendor custodian from working for, or volunteering in, the District in the future. The Board subsequently placed the vendor custodian on an internal Do Not Hire list.



» *High School Hourly Employee Drove a Student and Asked for Their Social Media Information During the Car Ride (21-01282)*

During an extracurricular event on campus, a high school hourly employee left in another teacher's car and took an eleventh-grade student with him to a gas station. During the car trip, he asked the student for their social media information and implied that he wanted to socialize with them outside of school by making comments such as, "Will your dad let you out of the house?" and "What is your schedule like after school?" The teacher who owned the car confirmed that he had asked the hourly employee to put gas in his car and said the hourly employee might have taken a student with him to the gas station. The hourly employee did not appear for his interview with the OIG.

The hourly employee's conduct violated CPS' Student Travel Policy and CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students. The OIG was unable to determine whether the hourly employee acted with a sexual purpose.

DCFS was contacted but declined to open an investigation.

CPS pulled the hourly employee from active duty after receiving the allegations. He was laid off six months later, and a Do Not Hire Pending Investigation designation was added to his personnel file.

The OIG recommended that CPS flag the hourly employee's personnel file for consideration of this matter in the event he applies for a position at CPS or is otherwise subject to a CPS background check. If he is permitted to work or volunteer at CPS or a charter school, the OIG further recommended that he receive training on appropriate staff-student boundaries prior to interacting with students.

The Board subsequently added a Do Not Hire designation to the hourly employee's personnel file.

» *Elementary School Employee Drove Two Students in His Personal Vehicle Without Parental Permission and Engaged in Overly Familiar Behaviors with Several Students (21-01313)*

An elementary school employee gave two students a ride home in his car without parental consent. During the trip, the employee stopped at a gas station and bought the students snacks. The employee also engaged in overly familiar behaviors with several students. He connected and communicated with students on Facebook and kissed students on the forehead as they entered the lunchroom. He also encouraged students to see him as a father figure. Some students called him "Pops," he called students "Son" or "My child," and he called himself at least one student's "godfather" even though that was not the case.

The employee's conduct violated CPS' Student Travel Policy, CPS' Staff Acceptable Use Policy, and CPS' Standards of Conduct for Maintaining Professional Boundaries between





Staff and Students. However, there was insufficient evidence that the employee engaged in any of the conduct for a sexual purpose.

DCFS declined to open an investigation.

CPS pulled the employee from active duty during the OIG's investigation, and he was laid off from CPS before the OIG issued its report.

The OIG recommended that CPS flag the employee's personnel file for consideration of this matter if he re-applies for a CPS position or is otherwise subject to a CPS background check. The Board subsequently flagged his personnel file for issuance of discipline in the event that he returns to CPS.

» *High School Substitute Teacher Had His Belt Buckle and/or His Zipper Undone During Class on Multiple Occasions and Had an Image of a Nude Woman Visible on His Cell Phone (20-00466)*

A high school substitute teacher had his belt buckle and/or his pants zipper undone during class on multiple occasions. The investigation also determined that during one class, the substitute had at least one image of a nude woman visible on his cell phone, but there was no evidence that he intended for students to see the image.

The substitute's conduct violated CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries. However, there was insufficient evidence that the substitute's conduct was of a sexual nature, or that it was persistent, pervasive, or severe and specifically targeted at students of a certain sex. Therefore, the substitute's actions did not constitute sexual misconduct or sexual harassment under CPS' Comprehensive Non-Discrimination, Harassment, and Retaliation Policy. There was also insufficient evidence to conclude that the substitute violated CPS' Staff Acceptable Use Policy because there was no evidence that he used CPS resources (e.g., WiFi) to put the image of a nude woman on his phone.

There was also insufficient evidence to substantiate other serious allegations against the substitute teacher, including allegations that he put his hand down his pants and masturbated during class; attempted to touch a student's breast; or told a student to get their phone out of their "ass."

While investigating the allegations against the substitute, the OIG determined that a school administrator violated CPS' Reporting of Child Abuse, Neglect and Inappropriate Relations Between Adults and Students Policy by investigating one of the allegations herself. Further, at least one unidentified staff member at the school violated the Reporting Policy by telling the substitute details of one of the allegations.

DCFS investigated and closed the investigation as unfounded. CPD also investigated and closed its case as non-criminal.



The substitute teacher was not initially blocked from substituting at CPS schools, but he was blocked a month later after a second set of allegations were made against him.

The OIG recommended appropriate discipline for the substitute teacher, including consideration of whether his block from receiving substitute teacher assignments in CPS schools should be lifted or remain in place.

Given that multiple staff members violated the Reporting Policy, the OIG also recommended that the District consider whether special training for all the high school's staff members would be beneficial. However, the OIG noted the likelihood that staff had already completed relevant training during the investigation.

The substitute teacher was terminated and a Do Not Hire designation was added to his personnel file. CPS confirmed that high school staff members receive annual training on their reporting requirements under CPS policy and state law.

» *High School Teacher Sang to a Student and Made a Comment About Their Weight (22-00282)*

A high school teacher sang part of the song "You Are So Beautiful" to a student while they were in his office working on a project. Earlier in the year, the teacher made a comment to the same student about their weight. Both incidents made the student uncomfortable, and the student requested to switch out of the teacher's classes.

The teacher's conduct violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students. Additionally, the OIG noted that the teacher had been disciplined in the past for similar conduct.

DCFS declined to investigate.

For the misconduct at issue in this investigation, the OIG recommended the teacher receive appropriate discipline and/or training on CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students. However, because the teacher had a history of similar misconduct, the OIG noted that appropriate action for the teacher warranted consideration of his previous and current misconduct findings taken as a whole.

The Board subsequently filed dismissal charges and notified the OIG that termination proceedings were pending with the Illinois State Board of Education. The teacher subsequently retired from CPS, and a Do Not Hire designation was added to his personnel file.



» *High School Teacher Touched an Eleventh-Grade Student on Their Knee and Inner Thigh During Class (22-00063)*

A high school teacher touched the left knee and inner thigh of an eleventh-grade student while helping the student during class. While the touch made the student uncomfortable, there was insufficient evidence that the teacher acted with sexual intent.

The teacher's conduct violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students because the contact was ambiguous and not appropriate to the circumstances.

DCFS declined to investigate.

The OIG recommended the teacher receive additional training regarding appropriate staff-student interactions. The teacher was placed on a Level Two Performance Improvement Plan and completed training.

» *Charter High School Staff Member Met with a Student Outside of School Twice (21-00481)*

A charter high school staff member met with a twelfth-grade student outside of school twice. On both occasions, the charter staff member went to the restaurant at which the student worked, and on one of the occasions, the two walked to Starbucks together. The charter staff member further acknowledged that the student used the staff member's phone to take two pictures of them, which the staff member then sent to the student via the CPS Remind app.

The charter staff member also admitted to telling the student, as well as most of her students, that she loves them, using language such as, "I love you, you're the best," and calling students "sweetie" or "hun." However, there was no evidence of any sexual or romantic intent.

There was insufficient evidence that the charter staff member had any romantic or sexual interactions with the student. During the investigation, the student made several serious allegations, including that they stayed overnight at the staff member's house, that the staff member blackmailed and manipulated them, and that they had sex. However, the investigation did not corroborate those allegations.

Had the charter staff member been a CPS employee, her conduct would have violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS declined to investigate.

The charter school pulled the staff member at the beginning of the investigation. Although she was later reinstated, she was pulled again after the student alleged that they had sex.

The OIG recommended that the charter school take appropriate action with respect to this investigation, including appropriate discipline for the staff member. The OIG also



recommended that the staff member receive training from the Office of Student Protections and Title IX regarding maintaining appropriate boundaries with students.

The Law Department informed the OIG that the charter staff member had been terminated by the charter school. The Board subsequently placed the charter staff member on an internal Do Not Hire List.

» *Charter High School Teacher Consistently Crossed Boundaries with Students and Had a Particularly Close Relationship with One Student (21-00660)*

A charter high school teacher, who worked at two charter schools over a period of five years, consistently crossed boundaries with students at both schools. While working at the first charter school, the charter teacher gave two students a ride in her personal vehicle. She also texted with students and went on outings with them. While it was alleged that the charter teacher had a sexual relationship with one student, there was insufficient evidence to corroborate that allegation.

At the second charter school, the charter teacher met with students outside of school and admittedly formed a “motherly” attachment with one student. The teacher told the OIG she would communicate regularly with the student to check in, often at night. During the investigation, a letter from the student to the charter teacher was found in the teacher’s classroom. The letter contained concerning statements about their close relationship and off-campus meetings. However, there was no evidence that these interactions were sexual in nature.

Had the charter teacher been a CPS employee, her conduct at the first school would have violated CPS’ Student Travel Policy. Although her interactions with students went beyond professional staff-student relationships, those interactions predated CPS’ Guidelines Regarding Maintaining Professional Staff/Student Boundaries. The charter teacher’s conduct at the second school would have violated the Guidelines, which had been adopted by that point.

DCFS investigated but closed the case with an insufficient finding of child abuse or neglect.

The charter teacher was pulled from active duty at the beginning of the investigation and her employment was terminated by the charter network prior to the investigation’s completion.

If the charter teacher were a CPS employee, the OIG would have recommended that she receive appropriate discipline. Because the charter teacher’s employment was terminated by the charter network, the OIG recommended that CPS flag her personnel file for review and consideration of this matter in the event that she applies for a position within the District again or is otherwise subject to a CPS background check. The Board subsequently placed the charter teacher on an internal Do Not Hire list.



» *Elementary School Vendor Custodian Made Affectionate Physical Contact with Two Students and Bought Them Gifts, Never Received Training on Staff/Student Boundaries (22-02251)*

A vendor custodian at an elementary school made physical contact with two students at the school, including giving the students hugs and letting one student kiss her on the cheek. The vendor custodian also purchased food for the two students on at least one occasion. However, there was no evidence that the vendor custodian's conduct was romantic or sexual in nature.

The vendor custodian's conduct violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

Additionally, the investigation established that none of the vendor company's employees at the school had received any trainings on Title IX, sexual harassment, or appropriate staff member/student interactions, as required for all individuals whose job involves contact with CPS students.

DCFS investigated and closed the case with no credible evidence of sexual abuse or exploitation. CPD also investigated and closed the case as non-criminal.

The vendor custodian was blocked by CPS at the outset of the investigation. However, her company unilaterally allowed her to return to the school prior to the completion of the OIG's investigation. The OIG later presented the vendor employee for reinstatement, which CPS approved pending the vendor custodian receiving training regarding appropriate staff member/student boundaries.

The vendor company's cleaning and maintenance contract with CPS was not renewed. According to CPS' financial database, all remaining contracts with the company were set to expire in 2024. However, should the company have any student-facing staff in CPS schools beyond the expiration date, the OIG recommended they be required to receive the same trainings that CPS provides to its own staff.

The Board flagged the vendor custodian's file for issuance of discipline in the event she applies to work for or volunteer with the District in the future.

» *Elementary School Teacher Engaged in Boundary-Crossing Behaviors with Students, Including Especially Egregious Behavior Focused on One Particular Student (21-00041)*

A teacher who worked at multiple District and charter elementary schools regularly engaged in egregious boundary-crossing behaviors with CPS students over several years. The misconduct began when she was a student teacher and continued after she became a regular teacher, and was primarily directed at one seventh-grade student and, to a lesser extent, their sibling. The teacher communicated extensively with the student, including exchanging over 3,400 text messages over a 10-month period. The teacher also



communicated with the student via FaceTime and Snapchat, and they used the Life360 app to track each other's phones.

The teacher and student talked during remote learning hours, late at night, and on the weekends. They often discussed their personal lives and their respective romantic interests. On one occasion, the teacher threatened to tell the student's parents that the student was dating another student of the same gender (who the teacher did not approve of) if the student did not end the relationship. On another occasion, when the student's classmate confided in the teacher about a private matter via text message, the teacher sent the student screenshots of the classmate's messages.

The student and teacher called each other "mom" and "[child]," and the teacher repeatedly criticized the student's mother and expressed her attraction to the student's father. The teacher visited the student at the student's father's house (with the father's permission) and established herself as a friend of the student's family. The teacher also bought the student gifts and took them on outings without permission from the school's principal.

The teacher fostered a sense of co-dependency with the student and encouraged the student to conceal the extent of their friendship, which had become noticeable to others at school.

The teacher also engaged in at least some of the same behaviors with the student's sibling.

Additionally, throughout her tenure at District and charter schools, the teacher communicated with other CPS students by phone and social media, drove at least one student in her personal car without proper authorization, and bought food for at least one other student.

The investigation also established that the teacher failed to report the suicidal ideation of two students on different occasions.

While the teacher admitted to nearly all the misconduct described above, she maintained that she did not violate any CPS policy and expressed no regret for her misconduct.

The teacher's conduct violated CPS' Staff Acceptable Use Policy, CPS' Student Travel Policy, CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries, and CPS' Suicidal Ideation Protocol. Although the teacher's conduct raised serious grooming concerns, there was no evidence that she acted with a sexual purpose or that she engaged in sexual misconduct with any student.

DCFS declined to investigate.

The teacher was a student teacher at an elementary school when she first began engaging in misconduct with the siblings. She was then hired as a teacher at another elementary school. CPS pulled the teacher from the second school shortly after receiving the allegations. The teacher was laid off six months later and designated as Do Not Hire



Pending Investigation, but she had already secured employment at a charter school after a CPS background check did not reveal the pending investigation. When she later applied to work at a different charter school, a CPS background check flagged her Do Not Hire Pending Investigation status, and that charter school put her application on hold. However, another charter school later hired the teacher despite receiving the same information.

The OIG recommended that CPS place a permanent Do Not Hire designation in the teacher's personnel file and notify the Illinois State Board of Education about the OIG's findings. At the time of the report, the teacher was working at a charter school. The OIG recommended that CPS notify the charter school about the outcome of the OIG's investigation, so that the charter school could make a determination regarding the teacher's continued employment.

The Board subsequently added a Do Not Hire designation to the teacher's personnel file.

» *High School Tutor Touched a Student During Sessions and Made Them Uncomfortable (22-00123)*

A high school tutor touched a student on the shoulders and back and placed himself in close proximity to the student during their tutoring sessions. During one session, the tutor touched the top of the student's thigh and knee. The tutor's conduct made the student uncomfortable, but there was insufficient evidence that the tutor touched the student for a sexual purpose.

The tutor's conduct violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS declined to investigate. CPD opened an investigation, which was suspended.

CPS pulled the tutor from active duty after receiving the allegations.

The OIG recommended that the tutor be reinstated, conditioned on the completion of training regarding proper boundaries between staff and students before returning to his position. The tutor was subsequently laid off from CPS, and a Do Not Hire designation was added to his personnel file.

» *High School Coach Texted With, Called, and Drove Student Athletes in His Personal Vehicle Without Proper Consent (23-00713)*

A high school counselor and track coach exchanged track-related messages with students on the team and made brief phone calls to at least two of the student athletes. The coach also drove students to track meets in his personal vehicle when the school was unable to provide a bus. While the coach said he obtained verbal consent from each student's guardian, he did not obtain written consent from the guardians and the principal as required by CPS policy.



The investigation did not corroborate initial, more serious allegations that the coach made a sexual comment to a student and engaged with students inappropriately.

The coach's conduct violated CPS' Staff Acceptable Use Policy and CPS' Student Travel Policy.

DCFS investigated and closed its case as unfounded.

CPS pulled the coach from active duty upon receipt of the initial allegations, and he was reinstated during the investigation after the OIG received evidence contradicting those allegations.

The OIG recommended that the coach receive appropriate discipline, including training regarding the Acceptable Use Policy and the Student Travel Policy. The OIG also recommended that CPS determine whether the school's athletic staff members should receive additional training on the two policies.

The Board subsequently placed the coach on a Level Two Performance Improvement Plan.

» *High School Staff Member Had Overly Familiar Interactions with a Student He Considered to Be a Child to Him (21-00513)*

A high school staff member had interactions with a student that clearly exceeded a professional staff-student relationship. The staff member told the OIG that the student was like a child to him and admitted to visiting the student at the hospital and at home. He also admitted to buying the student birthday presents. However, there was no evidence of sexual intent. There was also insufficient evidence to corroborate other allegations that the staff member had students visit the school after hours, talked to students on his personal phone, or was alone with another student multiple times.

The staff member's conduct violated CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries.

DCFS declined to investigate.

The staff member resigned prior to the completion of the OIG's investigation and does not currently work for CPS, but he volunteered as extra security during the homecoming dance after he resigned. Although the Office of Family and Community Engagement told the OIG they did not have a volunteer application on file for the staff member, the staff member forwarded the email confirming receipt of his application to the OIG after his interview.

The OIG recommended that CPS flag the staff member's personnel file for training on appropriate staff-student boundaries before he interacts with students again as a volunteer. The OIG also recommended that the school administration be reminded that volunteer applications are required for all volunteers, including former CPS employees.





The Board flagged the staff member's personnel file for issuance of discipline in the event he returns to work or volunteer with the District. The Board also reminded the high school's principal of the volunteer application requirements.

» *Charter High School Teacher Communicated with a Student on Snapchat (20-00286)*

A charter high school teacher communicated with a twelfth-grade student via Snapchat. However, there was insufficient evidence to corroborate an allegation that the charter teacher asked the student to send a photo of themselves, and there was no allegation that he sent or solicited any explicitly sexual messages or photos.

Had the charter teacher been a CPS employee, his conduct would have violated CPS' Staff Acceptable Use Policy and CPS' Guidelines Regarding Maintaining Professional Staff/ Student Boundaries.

DCFS declined to investigate.

Had the charter teacher been a CPS employee, the OIG would have recommended appropriate discipline and/or training on the policy concerning electronic communications with students.

In addition to working at multiple charter schools, the charter teacher was previously a CPS employee and had a Do Not Hire Pending Investigation designation in his personnel file. The OIG recommended that CPS consider whether the findings of this investigation support making the Do Not Hire designation in his personnel file permanent. The Board subsequently added a Do Not Hire designation to the teacher's personnel file.

» *High School Teacher Engaged in Overly Familiar, Boundary-Crossing Behaviors with a Student (20-01294)*

A high school teacher engaged in boundary-crossing behaviors with a student. The teacher allowed the student to call her "Mom" and took the student prom dress shopping. The teacher met with the student outside of school on at least one other occasion and transported the student in her personal vehicle. The teacher also exchanged non-school-related emails with the student. However, the OIG recognized some mitigating factors, including that the student initiated the discussions with the teacher and sought her guidance, all communications took place over the CPS email network, and there was no evidence that the teacher and the student exchanged cell phone numbers or personal email addresses until after the student graduated.

The teacher's conduct violated CPS' Guidelines Regarding Maintaining Professional Staff/ Student Boundaries and CPS' Student Travel Policy. Additionally, the teacher's non-school-related emails with the student constituted a minor, technical violation of CPS' Staff



Acceptable Use Policy. There was no evidence that the teacher engaged in any of the above conduct for a sexual or prohibited purpose.

DCFS declined to open an investigation.

The OIG recommended that the teacher receive appropriate discipline and/or additional training on proper staff-student boundaries.

The Board subsequently placed the teacher on a Level Two Performance Improvement Plan.

» *Elementary School Teacher Rubbed Student's Shoulders in Class and Teased Students About Their Interactions with the Opposite Sex (21-00167)*

An elementary school teacher rubbed male and female students' shoulders in class, which made at least one student uncomfortable and caught the attention of at least one staff member. The teacher also teased students about their interactions with students of the opposite sex, the same type of conduct the teacher was investigated for by the CPS Law Department at a different school several years earlier.

There was insufficient evidence to corroborate allegations that the teacher made comments on students' appearances or that she was a "pedophile," as one student had accused her of being.

The teacher's conduct violated CPS' Guidelines Regarding Maintaining Professional Staff/Student Boundaries. However, there was no evidence that the teacher acted with a sexual purpose.

During her OIG interview, despite being asked about her disciplinary history, the teacher failed to disclose that she had been the subject of three Law Department investigations relating to her conduct toward students. Given that the teacher was interviewed in all three investigations and received a formal warning after the Law Department substantiated some of the allegations, she should have been aware of her disciplinary history.

DCFS declined to investigate.

The OIG recommended that the teacher receive additional training on maintaining appropriate boundaries with students. Given the teacher's disciplinary history for similar conduct and her failure to disclose her disciplinary history during the investigation, the OIG additionally recommended that CPS consider whether to impose appropriate discipline.

The Board subsequently placed the teacher on a Level Two Performance Improvement Plan and required her to complete additional training.



» *Middle School Substitute Teacher Crossed Physical Boundaries with a Student During Class (20-00570)*

A middle school substitute teacher placed himself in close proximity to a student during class, to the point where his arm and/or chest were touching the student's body. There was insufficient evidence to corroborate a plethora of other allegations, including that the teacher asked the students if they ever had sex; made a comment about a student's weight; stared at female students in a sexual or otherwise inappropriate manner; touched his groin while looking at two female students; or touched one student's thigh or another student's buttocks.

The substitute teacher's conduct violated CPS' Standards of Conduct for Maintaining Professional Boundaries between Staff and Students.

DCFS declined to investigate. CPD investigated the allegation that the substitute teacher had touched a student's buttocks. The investigation was closed without any charges.

The OIG recommended appropriate discipline for the substitute teacher. The Board subsequently placed the substitute teacher on a Level One Performance Improvement Plan and assigned him training.

