



**Metropolitan Water
Reclamation District
of Greater Chicago**



Office of the Independent Inspector General

“[T]o detect, deter and prevent corruption, fraud, waste, mismanagement, unlawful political discrimination or misconduct in the operation of County government.”

**Metropolitan Water Reclamation District of Greater
Chicago
Quarterly Report
3rd Quarter 2019**

October 15, 2019

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OFFICE OF THE INDEPENDENT INSPECTOR GENERAL

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October 15, 2019

Via Electronic Mail

Honorable Kari K. Steele
and Honorable Members of the Metropolitan
Water Reclamation District of Greater Chicago
Board of Commissioners
100 East Erie Street
Chicago, Illinois 60601

Re: Independent Inspector General Quarterly Report (3rd Qtr. 2019)

Dear President Steele and Members of the Board of Commissioners:

As you know, on April 18, 2019 the Board of Commissioners of the Metropolitan Water Reclamation District of Greater Chicago (MWRD) adopted Ordinance O19-003 entitled Office of the Independent Inspector General (MWRD OIIG Ordinance) that has been designed to promote integrity and efficiency in government and provide independent oversight of the MWRD. Additionally, an Intergovernmental Agreement between the County of Cook and MWRD became effective by full execution of the parties on May 17, 2019 (Sec. II. Term of Agreement) thereby authorizing the OIIG to initiate operations relating to the MWRD. This quarterly report is written in accordance with Section 2-287 of the MWRD OIIG Ordinance to apprise you of the activities of this office during the time period beginning July 1, 2019 through September 30, 2019.

Background

In accordance with the MWRD OIIG Ordinance, this office will publicly report the number and type of investigations initiated and concluded during the subject time period along with other relevant data concerning the activities of the office. Quarterly reports also set forth OIIG recommendations for remedial or other action following the completion of an investigation and track whether recommendations were adopted in whole or in part or otherwise not implemented by the MWRD.¹ Finally, quarterly reports also describe miscellaneous activities of the OIIG that may be of interest to MWRD officials, employees, contractors and members of the public.

¹ Quarterly reports addressing the activities of the OIIG in connection with Cook County and the Forest Preserve District of Cook County can be found on-line at <https://www.cookcountyil.gov/service/public-statements-quarterly-reports-proposed-legislation>.

OIIG Case Activity

In connection with the number of complaints received by the OIIG, please be aware we have received a total of 23 new complaints during this reporting period.² This number also includes those matters resulting from the exercise of my own initiative (MWRD OIIG Ordinance Section Two (citing Cook County Code, Sec. 2-284(2))). Five MWRD OIIG case inquiries have been initiated during this reporting period while a total of 21 MWRD OIIG case inquiries remain pending at the present time. Please be aware that no OIIG investigations have been initiated pending the inquiry review process. There have been no matters referred to management or other enforcement or prosecutorial agencies this reporting period.

OIIG Summary Reports

During the 2nd Quarter of 2019, the OIIG issued 1 summary report that was issued as a public statement on September 5, 2019 (IIG19-0279 (MWRD Code of Ethics Review)).³ As you know, the review was initiated to assess the MWRD Ethics Ordinance and develop recommendations reflecting a comprehensive list of proposed ethics provisions for the Board of Commissioners to consider in expanding upon the current MWRD Ethics Ordinance.

As part of the review, we considered the Illinois State Officials and Employees Ethics Act, State Model Ordinance and also conducted a comparison of the MWRD Ethics Ordinance with the ethics ordinances adopted by the City of Chicago, Cook County and other large water districts in the United States. We concluded that the MWRD Ethics Ordinance remains in compliance with the ethics reform legislation mandated by the General Assembly in 2003. However, due to the size and complexity of the MWRD, we recommended that strong consideration be given to expanding the MWRD Ethics Ordinance to include other important ethics guidelines along with a strong statement of purpose to provide valuable internal and external guidance while demonstrating its commitment to the mission, values and principles of the MWRD.

The Committee on Ethics considered these and other related issues in a Study Session on September 12, 2019. Since that time, we have collaborated with the Law Department and anticipate presenting a comprehensive code of ethical conduct for consideration by the Board of Commissioners in the coming weeks.

² Upon receipt of a complaint, a triage/screening process of each complaint is undertaken. In order to streamline the OIIG process and maximize the number of complaints that will be subject to review, if a complaint is not initially opened as a formal investigation, it may also be reviewed as an "OIIG inquiry." This level of review involves a determination of corroborating evidence before opening a formal investigation. When the initial review reveals information warranting the opening of a formal investigation, the matter is upgraded to an "OIIG Investigation." Conversely, if additional information is developed to warrant the closing of the OIIG inquiry, the matter will be closed without further inquiry.

³ MWRD reports can be found at <https://www.cookcountyil.gov/service/metropolitan-water-reclamation-district-greater-chicago>.

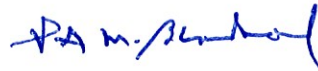
Miscellaneous OIIG Activity

Since establishing an office at MWRD Headquarters, the OIIG has, in addition to conducting investigations, pursued two objectives we believe are critical to our mission. First, we launched an information campaign in an effort to acquaint all MWRD employees with the nature and work of the OIIG. OIIG staff conducted over 70 in person training sessions at offices and reclamation plants throughout Cook County in order to accomplish this objective and answer any questions employees had regarding the nature of this new relationship between the MWRD and the OIIG. The sessions were productive both for the MWRD employees and OIIG staff. Second, we have worked with MWRD staff to fully integrate OIIG investigative capacity within the various electronic data sets maintained within the MWRD. Direct access to this data will enable this office to pursue its mission in the most efficient way possible both in terms of speed of investigations and minimized disruption of MWRD operations. Finally, please be aware that we have received the highest level of cooperation from MWRD staff in moving these issues forward.

Conclusion

Thank you for your time and consideration to these issues. Should you have any questions or wish to discuss this report further, please do not hesitate to contact me.

Very truly yours,



Patrick M. Blanchard
Independent Inspector General

.cc: Mr. Brian Perkovich, Executive Director
Ms. Susan T. Morakalis, General Counsel