



Office of the Inspector General OIG – Standards of Conduct (OIG-SOC)

Approved by the CHA Board of Commissioners
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Table of Contents

Introduction And Disclaimer.....	1
Personnel Responsibilities.....	1
Revisions.....	1
General Conduct Rules – Code of Ethics.....	2
Confidentiality.....	3
Conflicts of Interest and Recusal.....	4
Gifts.....	6
Potential Impeachment and Exculpatory Material.....	7
Personnel Work Rules – Work Schedule and Availability.....	8
IT Equipment and Electronic Data.....	9
Badges and Credentials.....	11
Secondary Employment.....	13
Evaluations.....	14
Training.....	14
Requests for Information of Documents.....	16
Document Retention.....	17

Standards of Conduct (OIG-SOC)

INTRODUCTION AND DISCLAIMER

The following OIG Standards of Conduct (OIG-SOC) of the Chicago Housing Authority (CHA or the Authority) set forth policies governing Office of Inspector General (OIG) personnel conduct. The OIG-SOC detail certain policies, guidelines, Responsibilities, and other matters the Inspector General determines are relevant to its management and operations.

The OIG- SOC supplements and clarifies as necessary CHA's Employee Handbook and CHA's Ethics Policy. The OIG-SOC shall not be interpreted and should not be construed as replacing, supplanting, or modifying the Employee Handbook, the Ethics Policy or any other rules, policies or procedures of the Chicago Housing Authority, which apply as appropriate to all Authority's personnel including OIG personnel. The OIG-SOC is intended to address discrete and unique issues and situations related to working for the OIG and may be more restrictive than those imposed on other Authority personnel.

Pursuant to the OIG Charter adopted by the CHA Board of Commissioners, the Inspector General "shall establish the organizational structure appropriate to carry out the responsibilities and functions of the OIG within the budget resources provided by the Finance and Audit Committee." The OIG-SOC shall be effective upon a majority vote of the Finance and Audit Committee following submission of a written draft prepared by the Inspector General and the Chief Legal Officer with their joint recommendation, along with the formal written concurrence and recommendation of the CEO.

PERSONNEL RESPONSIBILITIES

The OIG-SOC and any future modifications or additions formally adopted by the CHA Finance and Audit Committee shall be provided to all OIG personnel, who shall be responsible for becoming familiar with, and abiding by, these policies. Introductory training shall be provided to all incoming OIG personnel as part of their on-boarding orientation.

The OIG- SOC, in conjunction with the OIG Administrative and Procedural Policies, CHA Employee Handbook, Ethics Policy, and all other Authority policies represent the standards governing the conduct of OIG personnel. OIG personnel who violate these policies, as well as supervisors who accommodate such violations, may be subject to formal disciplinary action, up to and including discharge.

OIG personnel shall annually sign an acknowledgement that they have read, understand, and will abide by these policies.

REVISIONS

The OIG- SOC supersedes all prior OIG manuals, and any policies contained herein supersede prior versions or publications of those policies, as well as any prior formal or informal written procedures, advisory, guidance, or practice that may conflict with the OIG-SOC. Revisions and additions to the OIG-SOC will be made as necessary and distributed to all OIG personnel upon adoption by the CHA Finance and Audit Committee. At least once each year, the Inspector General will undertake a review of the existing policies to determine if modifications are needed, and shall submit any proposed changes, modifications or updates in writing to the CHA CEO and Chief Legal Officer for review as described above, before submission to the Finance and Audit Committee.

Standards of Conduct (OIG-SOC)

All OIG personnel are expected to familiarize themselves with the Authority's policies pertaining to personnel conduct, including but not limited to, the CHA Ethics Policy, the CHA Employee Handbook and other relevant Authority policies. Any questions should be directed to the Inspector General, who shall make any necessary consultation and/or referral to other CHA Departments or personnel, as applicable (e.g., CHA Ethics Officer, Chief Legal Officer,).

SECTION I: GENERAL CONDUCT RULES

OIG-SOC # 1.1 CODE OF ETHICS

I. Introduction

The OIG is charged with fostering and promoting accountability and integrity in the Authority's operation and administration of programs, and all OIG personnel are expected to have a strong commitment to the OIG mission.

The purpose of this policy is to set forth basic principles underlying OIG personnel's official duties.

III. Policy

- Integrity - Maintaining an ongoing dedication to honesty and responsibility.
- Compliance - Following all local, state and federal laws and regulations, and all OIG policies and procedures related to their duties and responsibilities.
- Fairness - Treating others with respect and decency.
- Impartiality - Avoiding any conflict of interest between one's personal interests and the public interest, and to bring to the Inspector General's attention any situation that may cause, or appear to cause, a conflict.
- Independence - Conducting OIG business with objectivity, and zealously maintaining the confidentiality of information and sources of information as required by law.
- Professionalism - Conducting OIG business with competence and forthrightness.
- Trustworthiness - Acting in a reliable and dependable manner.

Strict compliance with these Standards of Conduct is mandatory for all OIG personnel. OIG personnel are responsible for their own conduct in complying with the OIG-SOC. No one has the authority or the right to order or request an OIG personnel to violate the OIG-SOC. Any attempt (successful or not) by any person to influence another person to violate the OIG-SOC is itself a violation that should be reported to supervisors and/or the Inspector General. No one will be excused from complying with this OIG-SOC for any reason, even at the request of a supervisor.

Supervisors have the responsibility to ensure that personnel under their immediate supervision understand and comply with the OIG-SOC at all times. OIG personnel are responsible for promptly reporting any known or suspected violations of these Standards. Failures to report a known violation of these Standards are in itself a violation and will be treated in the same manner as any other violation.

OIG-SOC # 1.2
CONFIDENTIALITY

I. Introduction

In the course of their work, OIG personnel may access or otherwise learn about OIG investigations or other matters, OIG investigative techniques or procedures and other confidential, privileged, or sensitive personal information. OIG personnel must exercise appropriate care at all times to ensure that confidential and personal information is fully protected and not improperly disclosed to unauthorized individuals or entities.

II. Purpose

The purpose of this policy is to affirm the importance of protecting confidential, privileged, or sensitive personal information obtained in the course of official OIG duties.

III. Policy

A. Applicable Legal Authorities

1. The Office of the Inspector General Charter (OIG Charter) and the OIG Administrative and Procedural Policies, Section 4.6 set forth strict confidentiality restrictions concerning OIG investigative files and reports.
2. The CHA Ethics Policy, Article III, Part B, Section 8, among other applicable CHA provisions, and the CHA Employee Handbook prohibit Authority personnel from using or disclosing confidential information gained in the course of, or by reason of, his position or employment.

B. OIG Restrictions

1. OIG personnel have a duty to protect against any unauthorized use or disclosure of confidential, privileged, or personal information obtained in the course of their employment. OIG personnel are subject to disciplinary or other legal sanction for any violation of their confidentiality obligations.
2. OIG personnel may not comment on the existence or status of an investigation except as investigative needs require or if given express permission by the Inspector General (See OIG-SOC# 3.1 concerning requests for information).
3. OIG personnel shall direct any questions about this policy to the Inspector General.

OIG-SOC # 1.3
CONFLICTS OF INTEREST AND RECUSAL

I. Introduction

Due to the sensitive nature of the OIG mission and the importance of maintaining public trust, all OIG personnel must avoid any situation in which their personal or financial interests might cause their loyalties to be divided. Even the appearance of a conflict of interest could undermine public perception about the independence, fairness and/or integrity of the OIG office as a whole.

II. Purpose

This policy is intended to define conflict of interest and provide guidance for identifying and avoiding conflicts of interest. This policy also provides a process for recusing oneself from a matter where a real or apparent conflict of interest is unavoidable.

III. Policy

A. Applicable Rules

1. Applicable federal, state, and local laws, rules and regulations on ethics, as well as applicable CHA Board Resolutions, policies, rules and procedures. More specifically, the CHA Ethics Policy, Article III, Part B, Section 4, sets forth strict conflict of interest disclosures and restrictions for Authority's personnel.
2. These enhanced restrictions supplement the existing conflict of interest prohibitions identified in the CHA Ethics Policy.

B. OIG Restrictions

1. OIG personnel owe a primary duty to advance the CHA's interests in the course of their official duties, and to ensure that nothing undermines their independence or objectivity as a CHA OIG employee. Non-OIG activities and relationships, including but not limited to personal friendships, family relationships, outside employment, board memberships, volunteer activities, and/or other outside activities that may interfere with this obligation must be disclosed to the Inspector General.
2. OIG personnel may not directly or indirectly apply for, pursue or solicit employment for themselves, or any other person, from any Authority affiliated operations and with contractors, vendors, subcontractors, consultants, agents, and licensees or any other entity doing business with the Authority.

C. Recusal

1. Any OIG personnel, who determines that they may have an apparent or actual conflict of interest that would undermine the mission of the Office, must disclose this information to the Inspector General as soon as possible and depending on the circumstances, may necessitate a self-recusal. Self-recusal requires the person to notify his/her supervisor or the Inspector General of such recusal, and to provide sufficient information to establish the need for recusal.

Standards of Conduct (OIG-SOC)

2. OIG personnel must disclose to the Inspector General the circumstances that may give rise to apparent or actual conflict of interest so that a determination can be made in a timely fashion. A Notice of Recusal will be prepared by the Deputy Inspector General and distributed to the Inspector General and the Ethics Officer as provided in section III.E, below.

D. Disclosure of Potential Conflicts of Interest

1. OIG personnel are responsible for disclosing any actual or potential conflict of interest situation to the Deputy Inspector General or the Inspector General and must abide by any and all conditions imposed to control or minimize the conflict. Such conditions may include removing the conflicted personnel from any involvement in an OIG matter.

2. OIG personnel who wish to pursue an employment opportunity with another Authority department or a vendor involved in an OIG matter which that person is working on, must notify the Inspector General prior to initiating any action or communication with that department or vendor about such position. That personnel will be screened from any official contact with that department or entity to avoid a potential conflict of interest.

3. OIG personnel must provide notice to the Inspector General of all arrests and/or citations issued to them by any city, county, state, or federal entity. This does NOT include parking citations received off duty.

4. OIG personnel must provide notice to the Inspector General of any and all lawsuits in which they are involved either as a plaintiff, a defendant, or a witness.

E. Conflict Determination/Recusal and Ethics Officer Obligations

When the Inspector General becomes aware of a potential conflict of interest involving an OIG personnel in an investigation or other matter being handled by the OIG, the Deputy Inspector General will gather sufficient information in order to make an initial conflict determination. For purposes of this section, a conflict exists when there is a possibility that the person's, or the office's, impartiality might reasonably be questioned, requiring the person be recused from the OIG matter at issue. The Inspector General will advise the affected personnel and must promptly document the effective date of the recusal. The Notice of Recusal will be distributed on a need-to-know basis and will only contain those facts necessary to ensure that the affected person is effectively screened from the OIG matter at issue. If no conflict is determined to exist, the Inspector General or Deputy Inspector General will memorialize the inquiry and determination in a written memorandum, which will be maintained in a secured file or electronic location.

F. Post-Employment Restrictions

Pursuant to the CHA Ethics Policy, all OIG personnel are subject to an ongoing duty to comply with the OIG SOC regarding confidential information gained in the course of or by reason of his or her position or employment and must maintain those confidentiality obligations after leaving the OIG.

OIG personnel are also subject to the same post-employment restrictions in the CHA Ethics Policy, prohibiting personnel from certain activities for which the OIG employee participated personally and substantially during his or her term of employment.

Standards of Conduct (OIG-SOC)

OIG-SOC # 1.4

GIFTS

I. Introduction

Due to the sensitive nature of the OIG mission and the importance of maintaining public trust, all OIG personnel must avoid any situation in which their personal or financial interests might result in or create an appearance of conflict of interest or divided loyalties in the performance of official duties either individually or by the OIG. Any questions about gifts should be directed to the Ethics Officer.

II. Purpose

The purpose of this policy is to reaffirm and increase the restrictions governing the receipt, solicitation or offering of gifts by personnel of the Office of the Inspector General as imposed under the Ethics Policy. This section shall be read in conjunction with OIG-SOC # 1.3 (Conflicts of Interest and Recusal).

III. Policy

A. Applicable legal authority, including the CHA Ethics Policy, Article II. Code of Conduct, Section 4, and other applicable federal, state and local laws, rules, policies and procedures, and applicable CHA Resolutions, rules and policies), set forth strict restrictions concerning offering, receiving and soliciting gifts or favors to any Officer or personnel, spouse or minor child of either of them, or any immediate family member residing with the officer or personnel.

B. OIG personnel are prohibited from receiving any gifts or favors regardless of the dollar amount from anyone or entity affiliated with, doing business with, or intending to do business with CHA.

OIG-SOC # 1.5

POTENTIAL IMPEACHMENT and EXCULPATORY MATERIAL (GIGLIO MATERIAL)

I. Introduction

Due to the nature of the OIG mission, OIG employees' work on criminal investigations, and partnerships with prosecuting agencies, all OIG personnel must affirmatively disclose arrests, lawsuits, and any other relevant information that may constitute Giglio material.

II. Purpose

The purpose of this policy is to be consistent with the United States Supreme Court opinion and its progeny, *Giglio v United States*, 405 U.S. 150,154 (1972).

III. Policy

A. Applicable Legal Authority

State and federal law, consistent with *Giglio v United States*, 405 U.S. 150,154 (1972) and its progeny. The United States Attorney's Manual, Title 9-5.100: Policy Regarding the Disclosure to Prosecutors of Potential Impeachment Information Concerning Law Enforcement Agency Witnesses. Consistent with *Giglio v. U.S.*, this policy requires the disclosure of potentially exculpatory and information and impeachment information concerning Governments witnesses, specifically investigators, auditors, and analysts.

B. Fingerprints and Criminal Background Checks

1. All OIG personnel will be fingerprinted within first 90 days of employment with the OIG.
2. Criminal background checks will be conducted every 5 years of employment with the OIG.

C. Affirmative Duty to Disclose

1. All OIG personnel are required to disclose if he/she is a party to a lawsuit to the Inspector General.
2. All OIG personnel are required to disclose any and all arrest(s) and driving motor vehicle restrictions to the Inspector General.

SECTION II: PERSONNEL WORK RULES

OIG-SOC # 2.1 WORK SCHEDULE AND AVAILABILITY

I. Introduction

Due to the nature of the work of the OIG, it is necessary that work schedules remain flexible and adaptable to circumstances which may occur at any given time.

II. Purpose

The purpose of this policy is to ensure that work schedules for OIG personnel satisfy operational needs and reflect the unique responsibilities of the OIG.

III. Policy

A. Standard Work Schedule

1. The Standard Work Schedule for all OIG personnel is Monday through Friday, 8:00 A.M. until 5:00 P.M. with a one-hour lunch break (unpaid), for a 40-hour work week, except for Designated Holidays.
2. The Deputy Inspector General is responsible for coordinating the work schedules and availability of OIG personnel to ensure that operational needs are met.
3. The Inspector General may adjust work schedules, if reasonable in light of operational needs of the office and as necessary under the circumstances. Such adjustments are permissible only with prior approval by the Inspector General.
4. The Inspector General or a designee is required to maintain a record of any schedule change they approve. (e.g. an investigator working a Standard Work Schedule who begins surveillance at 2:00 A.M. may end their day at 10:30 A.M. with the Inspector General's approval.)

B. Alternative Work Schedules

As operational needs dictate, OIG personnel are permitted, with the Inspector General's advance notice and approval to an alternative work schedule. This must be documented by a memorandum in the individual's personnel file. Alternative Work Schedules should only be considered if OIG activities require alternative work schedule for a period of time due to an investigation or an audit.

C. Off-Duty Communication Availability

Depending on the operational needs, certain personnel may be required to be reachable during off-work hours. All OIG personnel must be reachable after regular work hours through their official assigned communications device and are responsible for regularly checking the device for messages, unless they have provided notice that they will be unreachable. OIG personnel who expect to be out of reach or unavailable during off-duty hours must advise the Inspector General.

OIG-SOC # 2.2
IT EQUIPMENT AND ELECTRONIC DATA

I. Introduction

Throughout the course employment OIG personnel will be assigned, or have access to, a variety of information technology (IT) resources and equipment to assist in completing their duties. In addition, OIG personnel will create and have access to electronic data. Proper use and security of IT equipment and electronic data is essential to ensure confidentiality and reliability of information.

II. Purpose

This policy is designed to supplement the Authority's existing Information Technology Services Information Security Policy, Section 16 Information Technology Code of Conduct (CHA IT Security Policy).

III. Policy

A. Definitions

The definitions provided in the Authority's IT Security Policy are adopted and incorporated herein. The following supplemental definitions are included for purposes of this OIG policy.

1. Information Assets – includes but is not limited to information and data created developed, processed, accessed, or stored in the course of official OIG work (e.g. documents, spreadsheets, email).
2. OIG IT Equipment - Authority or OIG-owned equipment and resources provided to OIG personnel, including but is not limited to, all PCs, flat monitors, laptops, Blackberries, iPhones, Android phones, printers, peripheral devices (such as “flash drives” and other mobile data storage devices), servers, routers and switches or evolving technologies that perform or replace the functions currently performed by such IT equipment.
3. Limited Personal Use - incidental, occasional and brief lawful activity while on duty which imposes negligible cost on the Authority and does not detract from the personnel's ability to perform their duties, interfere with another personnel's ability to perform their duties, or otherwise undermine the mission of the OIG.

B. OIG IT Equipment Assignment

1. All OIG personnel will be assigned a laptop or PC computer (including peripherals) to conduct authorized OIG business.
2. OIG personnel may request Flash drives or other minor peripheral equipment through their direct supervisor.
3. OIG personnel shall maintain custody of the computer equipment in accordance with the CHA's IT Security Policy and other relevant CHA policies and procedures until employment terminates or the computer equipment is returned. OIG personnel are responsible for lost or negligent damage to any assigned computer equipment.

Standards of Conduct (OIG-SOC)

4. All computer equipment returned to inventory shall be inspected and verified by the OIG Administrative Coordinator, who shall confirm that the computer equipment and all peripherals are returned and in working condition and that any confidential information is stored in a secure location on the OIG's authorized network or case management database.

C. General Rules Concerning Use of OIG IT Equipment and Technology Resources

OIG IT equipment is intended for business purposes, with limited personal use permitted in accordance with the OIG mission, OIG Administrative and Procedural Policies, CHA IT Security Policy and the Employee Handbook. Limits on use are set forth in the CHA IT Security Policy. Users have no expectation of privacy in their use of OIG IT equipment or Technology Resources (e.g., Internet services). The OIG reserves the right to monitor for unauthorized activity, the information sent, received, processed, or stored on OIG provided network and computer resources, without the consent of the creator(s) or recipient(s). This includes use of the Internet as well as the Authority's email and instant messaging systems (if available).

OIG employees leaving OIG computers unattended (in OIG office location or in the field) for any length of time shall ensure that open documents and applications are saved or closed, and that access to the equipment is locked and/or shutdown. All individually assigned OIG computers shall be logged out at the end of the workday and shall operate with an automatic default which results in log-out following no more than 15 minutes of idle time or non-use.

D. OIG Personnel Obligations Concerning Electronic Data

All OIG personnel who come into contact with internal or confidential electronic data or information must keep this information secure and private in accordance with all applicable laws. (See OIG-SOC # 1.2).

Therefore, OIG personnel or persons authorized to access OIG electronic data files and information is required:

1. To follow CHA's IT Security Policy;
2. To only access OIG electronic data files on a need-to-know basis related to official duties;
3. Not to exhibit or divulge the contents of any OIG electronic record to any person except in the conduct of an official OIG work assignment or in accordance with the policies of the OIG;
4. Not to disclose the specifics of non-public OIG related investigations to unauthorized personnel;
5. Not to remove or cause to be removed copies of any investigation record(s) or report from any file from the office where it is kept except in the performance of his/her duties.

OIG-SOC # 2.3
BADGES AND CREDENTIALS

I. Introduction

The OIG issues badges and/or credentials to OIG personnel as a means of identification for use in connection only with official duties. This policy outlines requirements for the safeguarding of badges and credentials against misuse.

II. Purpose

The purpose of this policy is to ensure that badges and credentials are appropriately managed and used only in connection with official duties.

III. Policy

Depending on their position, OIG personnel designated by the Inspector General shall be assigned a badge and a badge number. All OIG personnel will be issued credentials which include the person's photograph.

A. Use

1. OIG badges and/or credentials are issued for purposes of identification and shall be displayed only in connection with official duties. A badge and/or credentials may be used only by the person to whom they are issued and only for authorized official use. Authorized official use includes but is not limited to: identification at an interview, identification during surveillance, or to gain access to Authority operated facilities for the purpose of conducting official OIG business.
2. OIG personnel may not alter or change the officially issued credentials in any way including, but not limited to, affixing any unauthorized item or writing to it.
3. The OIG badge is to be carried on one's person only while on duty or while commuting to/from work. At all other times, the badge shall be secured at work in a locked office or a locked desk, or in a secure location at home. The badge must not be left in a vehicle or unattended bag.
4. Key cards or other identification shall not be kept with the badge.

B. Misuse

Unauthorized use or misuse of the badge and/or credentials may result in discipline, up to and including discharge. The following is a non-exhaustive list of improper uses:

1. Displaying the badge and/or credentials to a law enforcement officer in hopes of affecting his or her behavior (e.g., to get out of a ticket, an arrest, or other law enforcement action).
2. Displaying the badge and/or credentials at a place of business to gain access at a reduced cost or no cost, or to receive any other privileges not available to the general public or government personnel.
3. Displaying the badge and/or credentials for personal reasons or when use of a law enforcement or civilian identification card is required or appropriate.

Standards of Conduct (OIG-SOC)

4. Failure to take appropriate care to secure, or maintain control of, badge and/or credentials.

C. Loss/Theft of Badge and/or Credentials

1. Each OIG personnel to whom a badge and/or credentials is assigned shall make every reasonable effort at all times to prevent theft or loss of such items.

2. Upon determining that either a badge or credentials is missing, OIG personnel must immediately notify his/her direct supervisor and provide a written report of the circumstances surrounding the disappearance.

3. The Inspector General shall then determine whether or not the loss of the badge and/or credentials were avoidable. If the loss is determined to have been unavoidable, a replacement badge and credentials shall be issued to the OIG personnel at no cost. If the loss is determined to have been reasonably avoidable and/or caused by the person's negligence, OIG personnel will be required to pay the replacement cost.

4. Avoidable loss of a badge or credentials may be considered as grounds for disciplinary action.

5. In the case of all lost badges, a report will be made to appropriate law enforcement agency so that the badge number can be included in NCIC for national tracking purposes.

D. Damaged/Worn Badges or Credentials

Damaged or severely worn OIG badges or credentials shall be turned into the Deputy Inspector General and replacements shall be issued.

E. Authority Property

All OIG badges and/or credentials are property of the Authority and must be immediately relinquished upon request of a supervisor or at the termination of employment.

OIG-SOC # 2.5
SECONDARY EMPLOYMENT

I. Introduction

The OIG recognizes that some OIG personnel may wish to seek outside employment. However, due to the sensitive nature of the mission of the OIG, and the vital importance of maintaining public trust in the OIG, there are some restrictions on engaging in such activity.

II. Purpose

The purpose of this policy is to set forth the methods for requesting dual employment and guidelines regarding dual employment.

III. Policy

A. Legal Authority-CHA Ethics Policy, Article II. Code of Conduct, Section 11, and the Employee Handbook set forth restrictions on secondary employment.

B. Requests for outside employment will be reviewed and evaluated to determine if there is any conflict of interest (actual or apparent) or conflict of commitment (that is, the activity must not detract from the ability to perform OIG duties). All requests will be submitted and approved by the Inspector General. Approval will be revoked if the outside employment impairs or interferes with official duties. OIG personnel may not engage in any approved outside employment on any days that he/she called in sick to the Inspector General.

C. For record keeping and notification, once approved, information is submitted to the Department of Human Resources and the Office of the General Counsel.

**OIG-SOC # 2.6
EVALUATIONS**

I. Introduction

To assist in the development and progress of OIG personnel, an evaluation shall be conducted at least once a year.

II. Purpose

The purpose of this policy is to standardize the evaluation process necessary for OIG personnel development and productivity.

III. Policy

Through the evaluation process, OIG personnel may make substantial improvements over past performance, thereby making a significant contribution to the mission of the OIG. In addition, the OIG is able to refine and coordinate its objectives and to analyze personnel's development, performance and contribution to the overall mission of the office. The Deputy Inspector General shall work with OIG personnel to develop appropriate objectives, and to define criteria for evaluating performance toward those objectives. OIG personnel and the Inspector General will discuss the evaluation and each person will receive a final signed copy of their evaluation for their records.

**OIG-SOC # 2.7
TRAINING**

I. Introduction

The Inspector General's Office is committed to developing the professional skills of all OIG personnel to enhance the efficiency and effectiveness of the office. Training is intended to improve public service, increase efficiency and economy, build and retain a workforce of skilled and efficient personnel, and install and use the best modern practices and techniques in the conduct of OIG work.

II. Purpose

The purpose of this policy is to help achieve the OIG mission and performance goals by improving organizational performance through, formal (classroom) training, (forums, seminars, workshops), technology-based training (computer-based, satellite instruction), workplace sessions, and conferences.

III. Policy

A. Requests for Training

A written training request form must be submitted for all training even it is free and/or can be completed in the office, e.g., webinar, podcast, or conference call.

B. Approvals

The Inspector General is required to review and approve requests for training occurring out of the office or which require payment. Approval will be based on the following factors:

- Demonstrated benefit of the training to the OIG, (e.g., improve current job

Standards of Conduct (OIG-SOC)

- performance or expand current or future job responsibility).
- OIG personnel professional development.
- Meet office needs in response to evolving human resource management plans.
- Serve the public interest.
- The operational needs of the office, as well as the individual personnel work obligations.

Certain OIG positions include outside training as part of the orientation/introductory process. In such cases, the Deputy Inspector General will complete the request form.

C. Types of Training

1. In-House Training

The OIG will provide in-house training as appropriate, and OIG personnel are encouraged to submit suggestions for in-house training topics. Personnel will be given advance notice of in-house training sessions. Attendance at these sessions is mandatory unless informed otherwise by the Deputy Inspector General. Anyone with a scheduling conflict or potential conflict must inform their immediate supervisor as soon as possible.

2. Outside Training

OIG personnel who wish to attend an outside training opportunity (regardless of the source of the training) must seek approval from the Deputy Inspector General. Requests for outside training must be made in writing which requires the Deputy Inspector General's approval even if there is no cost. OIG personnel are encouraged to attend training held by various Inspector General Offices and law enforcement agencies including but not limited to the FBI, HUD OIG, Department of Labor and the Cook County State's Attorney's Office.

D. Funding

The OIG has limited funds available to provide for training from outside sources. OIG personnel are also encouraged to explore any applicable discounted rates available for government organizations or groups. Approval to attend training does not automatically guarantee funding by the OIG. If you are entitled to payment for other expenses during the training, you will be informed of the process in order to receive reimbursement.

E. Personnel Conduct

OIG personnel who are selected for outside training must remember that they are representing the OIG and must conduct themselves in a professional manner. OIG personnel are reminded to adhere to the office Confidentiality Agreement with regard to OIG business.

F. Follow-Up

OIG personnel who attend outside training opportunities may be required to provide a summary of their training either orally or in writing to their team or other relevant sections of the OIG. Any relevant materials not prohibited from copying and internal use by the OIG should be made available to appropriate OIG personnel.

SECTION III: GENERAL OFFICE PROTOCOL

**OIG-SOC # 3.1
REQUESTS FOR INFORMATION OR DOCUMENTS**

A. Subpoenas or Court Orders

The Inspector General shall notify and consult with the Chief Legal Officer on any requests stemming from active or anticipated litigation, including subpoenas and court orders. Before the release of any OIG records or information, the Inspector General must review the records to determine if appropriate privileges preclude dissemination.

1. Service of Subpoena

OIG personnel are not authorized to accept a subpoena that is specifically directed to another OIG personnel without prior approval of the Inspector General. Subpoenas directed generally toward the OIG or Keeper of Records may be accepted by any OIG personnel.

2. Receipt of Subpoena/Court Order. All subpoenas and court orders must be forwarded to the Inspector General as soon as they are received.

B. Requests from outside counsel

Before releasing any information, the Inspector General must review the file to determine if appropriate privileges preclude dissemination and cooperate with the Authority's Office of General Counsel assuming there is no conflict between the Office of General Counsel and the OIG.

C. Requests from Outside Law Enforcement Entities

All requests for information or documents should be forwarded to the Deputy Inspector General for appropriate response.

D. Informal requests for non-investigative documents or information

OIG personnel must consult the Deputy Inspector General prior to releasing any non-investigative information or documents to ensure that such release will not adversely impact an investigation or other matter.

OIG-SOC # 3.2
DOCUMENT RETENTION

I. Introduction

All OIG records, including electronic and scanned copies obtained or created by the OIG shall be subject to U.S. Department of Housing and Urban Development (HUD) regulations, the Local Records Act (50 ILCS 205/), the Cook County Local Records Commission Rules (44 Ill. Admin. Code Title Part 4500), and the Authority's document retention policies and procedures.

II. Purpose

The purpose of this policy is to provide specific rules regarding the retention and destruction of OIG records and documents.

III. Policy

A. The process of record retention and disposal is governed by the U.S. Department of Housing and Urban Development (HUD) and by the Local Records Commission of Cook County (LRCCC). The CHA has incorporated these regulations in its Records Management Program to ensure that the Authority meets its legal obligations.

As required by law, the OIG will only dispose of records in accordance with the CHA's Records Management Program and after receiving a Records Disposal Certificate based on an Application for Authority to Dispose of Local Records.

B. On a periodic basis the OIG will conduct a review of all records to determine which records are eligible for destruction according to the CHA Record Retention Schedule. All records to be disposed will be reviewed to ensure:

1. Compliance with the specifications listed on the State of Illinois-approved Application to Dispose of Local Records;
2. Compliance with all city, state, and federal audit requirements; and
3. That the records will not be needed for any pending or anticipated litigation.

C. Any application for approval to dispose of OIG records must be approved by the Inspector General.

D. Once the appropriate records have been identified, the OIG will coordinate with the designated CHA Records Retention personnel to follow the steps necessary for proper disposal.

E. The OIG shall retain copies of all documentation supporting the destruction of any OIG records and sufficiently identify the records destroyed.

**OIG – Standards of Conduct (OIG-SOC)
Acknowledgement Receipt**

OIG –Standards of Conduct (OIG-SOC)

Reviewed and updated by Inspector General Kathryn Richards in September 2021 and approved by the CHA Board of Commissioners on November 16, 2021.

Annual Acknowledgement of Receipt

I have received a copy of the OIG Standards of Conduct. I understand that I am responsible for reading, understanding, and abiding by these policies.

I understand that if I have questions, at any time, regarding these policies, I will consult with my immediate supervisor or the Inspector General.

OIG Personnel Signature: _____

OIG Personnel Printed Name: _____

Date: _____

