

OIG INVESTIGATIONS OF SEXUAL ALLEGATIONS

Presentation to the
Board of Education of the City of Chicago

September 26, 2024

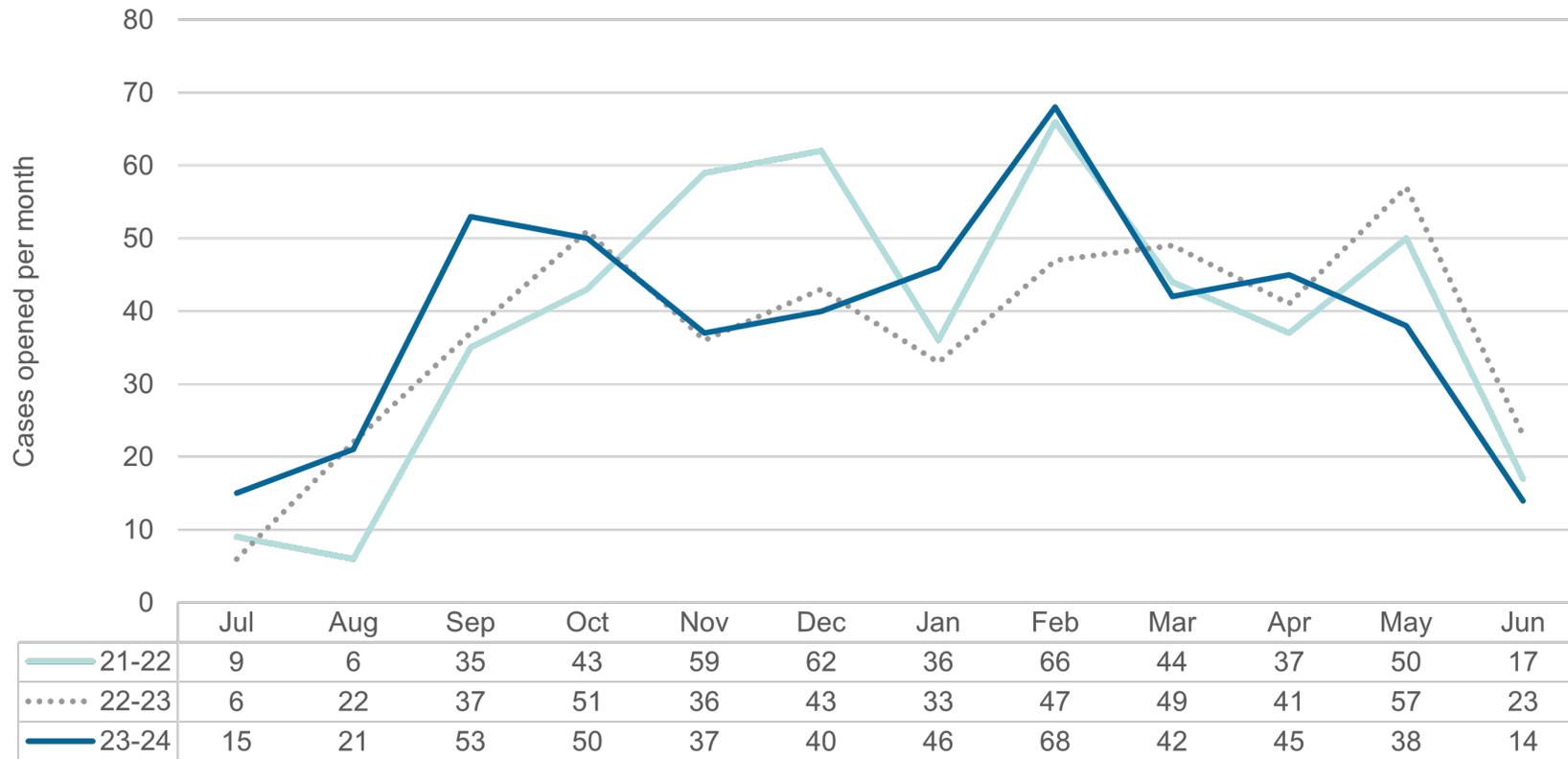


Chicago Board of Education • Office of Inspector General

CASES OPENED PER MONTH

OIG SAU Case Intake Per Month

Cases opened July 1, 2020 – June 30, 2024



The OIG received **469** complaints from July 1, 2023, through June 30, 2024, and closed **363** cases.

This is a **5.3% increase** from FY22-23, when we received 445 complaints.

We were on pace to hit 500 complaints in a fiscal year for the first time, but new complaints slowed in the spring of 2024.

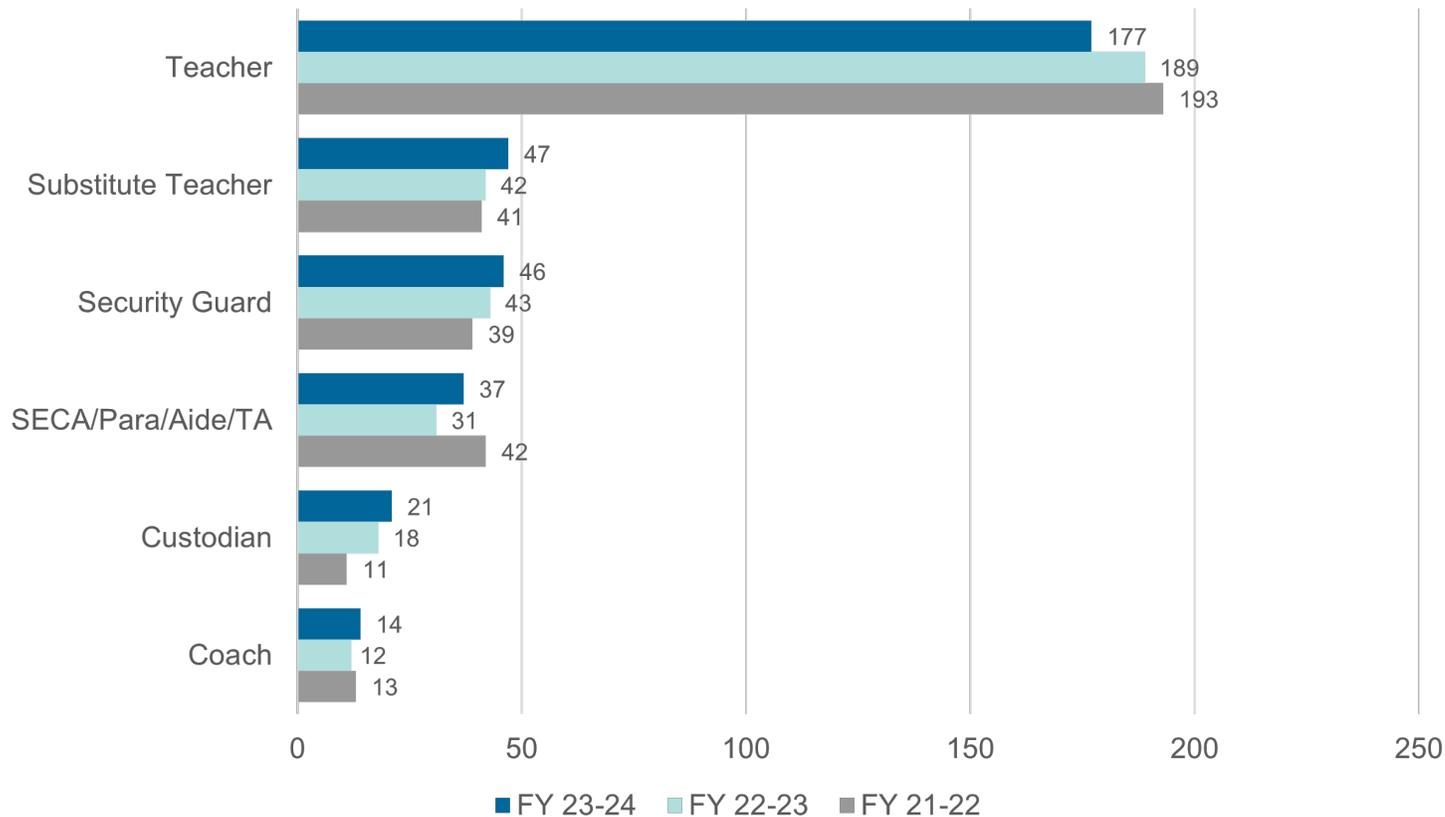
We **pulled or blocked a total of 80 people** in FY 23-24. This was an increase from FY22-23 (73 pulls and blocks), but lower than FY21-22 (114 pulls and blocks).



ALLEGATIONS BY SELECT JOB CATEGORY

Comparison to Previous Fiscal Year

Allegations by Select Job Category
FY23-24 compared to FY22-23 and FY21-22



This slide reflects the top six job categories that were the subject of SAU allegations for the last three years. We monitor job category trends to identify both improvements and concerning changes and share those observations back with the District.

In FY23-24, complaints against **teachers** constituted 38% of the total allegations, down from 42% in both FY21-22 and FY22-23. In addition, **we pulled 12 District teachers in FY24**. For comparison, we pulled 23 in FY22.

There has been an increase in allegations involving **custodians** to 21 (4.5%); 6 of those were pulled (5 were vendor custodians).

Security Guards and **Coaches**: both categories are holding relatively steady as far as the number of complaints. However, in FY24, **6 out of 14 coaches** under investigation were pulled.

Allegation Rate Comparison

Elementary School vs. High Schools

	Elementary School	High School
Allegations July 1, 2023 – June 30, 2024	222	240
20th Day Enrollment	221,303	101,948
% Total CPS Enrollment	68.5%	31.5%
% of Total Allegations	48.1%	51.9%
Allegations Per 100,000 Students	100.3	235.4
Pulled/Blocked Staff	41	37

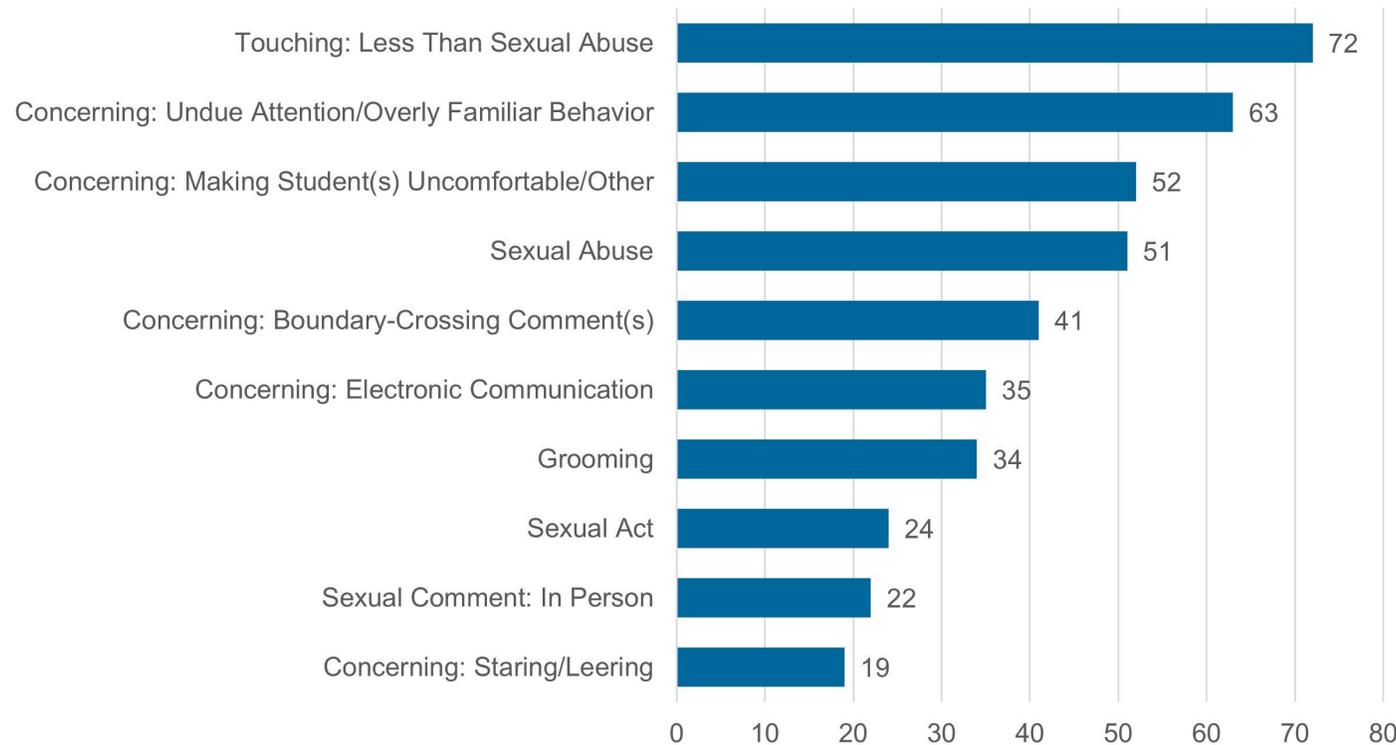
Elementary and high schools have reported a similar number of allegations, which is typically what we see each year. However, per student, the high school allegation rate is **2.35 times** the elementary school rate.

37 individuals have been pulled or blocked from high schools, which is **47.4%** of pulls and blocks. 41 individuals have been pulled or blocked from elementary schools, which is **52.6%** of pulls and blocks.

TOP TYPES OF ALLEGATIONS INVESTIGATED

Investigations Categorized by Initial Allegation Type

Cases opened July 1, 2023 – June 30, 2024



The chart shows the top 10 categories of allegations on intake for FY 23-24. Overall, cases in the "Concerning" categories made up 52% of the complaints the OIG received during FY 23-24 (246 of 469 complaints).

Collectively, sexual abuse and act allegations represent almost 16% of total allegations received in FY23-24.

FISCAL YEAR 2024 FINDINGS

Substantiated Reports – Primary Finding	Number of Reports
Sexual Act	2
Sexual Abuse	3
Grooming	3
Sexual Comments/Electronic Messages	11
Sexual Harassment/Other Sexual Misconduct	10
Failure to Report	2
Touching/Less than Sexual Abuse	8
Concerning/Other	18

NOTE: The SAU issued reports in FY24 with the noted findings; the substantiated misconduct itself did not also take place in FY24.

In addition to the substantiated findings, the SAU:

- Issued **33 Not Substantiated** and Informational Reports
- After conducting an initial investigation:
 - **Referred 154** complaints to other CPS Departments
 - **Administratively Closed 132** complaints



PERSONNEL ACTIONS

Pulled or Blocked

As of September 20, 2024, **34** CPS staff remain pulled with pay in connection with an open OIG investigation. So far in FY24-25, **2** individuals were pulled or blocked following the OIG notifying the District of a potential threat to student safety. Additionally, **5** substitute teachers are currently blocked.

Reinstated

So far in FY24-25, **6** individuals who were pulled or blocked were reinstated either based on the OIG's recommendation, or after the conclusion of the OIG's investigation.

Fired or resigned/retired

7 individuals who were subjects of an OIG investigation were fired or resigned/retired so far in FY24-25.

PULLED CPS TEACHERS

Pulled teacher investigations have always been prioritized.

- In early 2022, there were 38 pulled teachers.
- Since then, the number has fluctuated between 17 and 20 at a time.

We have worked hard to reduce the number even further. As of today, we have open investigations involving **10 teachers who are pulled with pay**: 5 active investigations and 5 cases that are in the report-writing process.

CASE INVENTORY AND UPDATES

As of September 20, 2024, the OIG had 226 active investigations and had substantially completed investigating an additional 122 cases.

This includes 12 Title IX sexual harassment investigations under the 2020 regulations involving a formal complaint of adult-to-student sexual harassment.

LOOKING AHEAD AT FISCAL YEAR 2025

Refining the Types of Complaints Referred to the SAU

FY25 may be a transformational year for the SAU. Since the SAU's inception, we have been implementing strategic changes to our procedures to better handle the large complaint volume. This year is no exception.

- Since the Spring of 2024, we have been discussing with District leaders how we can narrow the scope of complaints referred to the SAU for investigation to those that more clearly articulate sexual misconduct concerns.
 - 70+% of the SAU's complaints from the last several years have been categorized as Concerning-Other (which may involve leering, “creepy” behavior, or other potentially concerning behavior) or Non-Sexual Touching.
 - We analyzed 700+ closed Concerning-Other complaints from the last three years and found that 2% (12) of these complaints led to a sexual misconduct finding: 1 grooming and the rest non-criminal sexual misconduct (e.g., sexual comments/texts/harassment).

These discussions are ongoing. While we hope to better direct our unit's resources and expertise to the more serious cases (and likely reduce caseloads and improve timeliness), we have a shared goal of ensuring that complaints not referred to the SAU are appropriately addressed elsewhere.



LOOKING AHEAD AT FISCAL YEAR 2025

Compliance with Title IX Regulations

Revised Title IX Regulations went into effect on August 1, 2024 and required the SAU to revise many of its investigation procedures. Among other changes, the new Regulations:

- Significantly expand the definition of sexual harassment and the types of sex-based misconduct covered by Title IX.
 - OSP anticipates that a vast majority of complaints referred to the SAU will be designated as Title IX.
 - The Regulations may restrict the SAU from referring or administratively closing many complaints, requiring a full investigation be completed.
- Title IX investigations require more administrative work and regulatory oversight by managers, such as:
 - Numerous written communications with the parties at specified times during an investigation;
 - Increased managerial scrutiny for all OIG cases to ensure each case is properly designated based on the allegations and all required procedural steps are followed; and
 - Significant attorney involvement at the conclusion of a Title IX investigation to coordinate evidence-sharing with all parties and address any resulting questions or comments.



LOOKING AHEAD AT FISCAL YEAR 2025

The progress we are striving to make this Fiscal Year may be offset by other requirements and restraints.

- If we can direct our resources and expertise towards the more serious allegations, we expect caseloads will decrease and the timeliness of our investigations will improve.
- However, the new Title IX Regulations will require more resources for each investigation and restrict the types of complaints we can refer or close without a full investigation, even when there is no evidence of sexual misconduct.
- We also have 1 (of 2) Assistant Inspector General position (vacant since April) frozen in the District's hiring pause. AIGs are core members of the SAU management team; they provide legal counsel to investigators, manage our Staff Attorneys, analyze data and prepare Board presentations, and oversee and edit every investigative report the SAU issues. This fall, I am also the Acting Inspector General with supervisory duties for the entire OIG, beyond the SAU.

Despite the challenges, we are optimistic that we can continue working with OSP, District leaders, and the Board to achieve our goals this Fiscal Year.



OIG SEXUAL ALLEGATION CATEGORIES

Sexual Act	Penetration
Sexual Abuse	Physical conduct for sexual gratification, e.g., groping, fondling
Sexual Comment — In Person	Unambiguously sexual comment to student
Grooming	Actions to break down inhibitions for the purpose of sexual conduct
Sexual Electronic Communication (“Sexting”)	Sexual text messages, emails, or other communications
Touching—Less than Sexual Abuse	Touching of a possible (not obvious) sexual nature
Concerning: Other*	Leering, “creepy” behavior or other potentially concerning behavior
Student-on-Staff Inappropriate Conduct	Student behavior toward a staff member (now addressed by EOCO)
Outcry About Past Conduct	Recent outcry about allegations from several years ago

*Starting in School Year 2023-24, the **Concerning: Other** category includes more specific subcategories of misconduct.



OIG SEXUAL ALLEGATION CATEGORIES

Concerning: Boundary-Crossing Comment(s)	Overly-familiar but non-sexual comments or communications
Concerning: Electronic Communication	Non-sexual text messages, emails, or other communications
Concerning: Individual Gift-Giving	Giving item(s), food, money, or other gifts to a student
Concerning: Making Student(s) Uncomfortable/Other	Non-specific allegations of student discomfort, “creepy” behavior, or other potentially concerning behavior
Concerning: Staring/Leering	Staring or leering at a student(s)
Concerning: Undue Attention/Overly Familiar Behavior	Interactions with a student(s) that exceed appropriate staff-student boundaries in frequency or type
Concerning: Unauthorized Transporting Student(s)	Transporting students in a personal vehicle without parental and administrative approval
Concerning: Viewing/Sharing Sexual Media	Viewing sexual media in a school setting or sharing sexual media with a student(s)

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