

CCAP, the applicant 1) must be an Illinois resident, and 2) must be one of the following: a recipient of Temporary Assistance to Needy Families; a family with a child who has special needs; a teen parent enrolled full-time in school or classes; or a working family whose monthly income does not exceed the income guidelines for their family size.³

With respect to those who qualify because they are low-income working families, CCAP policy provides that “child care services received by a family must be reasonably related to the hours of training or employment including the transportation needs of the family.”⁴ Accordingly, when applying for the CCAP, an applicant must certify that he or she “understand[s] that I must be working or attending and [sic] IDHS approved education, training, or other work related activity in order to be eligible to receive child care benefits,” and must provide proof of employment, including pay stubs and work schedules, and a Wage Verification form that must be completed and signed by the applicant’s employer.⁵

In addition to providing employment information, a CCAP applicant must also include the name of his or her selected child care provider and the expected child care arrangement with that provider. The child care provider must also complete a section of the CCAP application, providing relevant business information and information about when child care began or is expected to begin for the applicant’s child or children, and must certify that the information provided is true and correct. In addition, the child care provider must agree to maintain daily attendance records “to fully document the extent of services provided” for a minimum of five years, and to make all records and supporting documentation relevant to the services for which the State is billed available to any and all authorized DHS representatives and federal authorities.⁶

Once a CCAP application is fully completed, it must be submitted to one of the Child Care Resource and Referral (CCR&R) agencies that handle and process CCAP paperwork for the State. CCR&R agency staff are then responsible for entering the application information into a Child Care Management System, and verifying certain information using available State databases.⁷ After the information is verified, the CCR&R agency will review the application and any additional required documentation for completeness, and determine income and service

³ DHS Child Care Assistance Program, <http://www.dhs.state.il.us/page.aspx?item=30355> (last visited 8/1/17).

⁴ 01.03.02 Employment, <http://www.dhs.state.il.us/page.aspx?item=10552> (last visited 8/1/17).

⁵ See CCAP application and redetermination forms.

⁶ *Id.* The child care provider certification section also states that a “failure to maintain adequate records shall establish a presumption in favor of the State for any funds paid by the State for which adequate documentation is not available to support disbursement.”

⁷ 02.01.01 Application Process, <http://www.dhs.state.il.us/page.aspx?item=10564> (last visited 8/1/17). In addition, during an interview with a CCR&R representative, investigators were informed that CCR&R staff can verify information such as family composition, public assistance benefits, applicant employment information, child support income, and more using State databases. With respect to applicant employment information, [CCR&R Agency] [CCR&R Employee] stated that [CCR&R Agency] should be contacting the listed employer to verify whatever is on the Wage Verification Form or employment letter. [CCR&R Employee] stated that there was a period in 2014 when DHS told [CCR&R Agency] that employment did not need to be verified, but said that at the time of his interview in May 2016, [CCR&R Agency] was verifying client employment about 80-90% of the time.

eligibility.⁸ Ultimately, if an applicant is approved for CCAP benefits, a case is opened and the applicant becomes a CCAP client.⁹

Once an individual becomes a CCAP client, a Billing Certificate is automatically generated each month and mailed to the provider listed on the client's CCAP application. At the conclusion of each month, the provider must complete the Certificate, inputting the number of days the client's child or children actually received child care services from the provider, certify that the information provided is complete and accurate, and submit the completed Billing Certificate to the client's CCR&R agency. Once received, CCR&R agency staff will enter this information and the total number of days each child was eligible to receive assistance for that month into the DHS computer system, and payment will be remitted to the provider by the Illinois Comptroller's Officer (IOC) thereafter for the child care services rendered.

II. ALLEGATIONS

On November 30, 2015, the OEIG received a complaint alleging, among other things,¹⁰ that Jorge Roman, the owner of the Bright Beginnings Academy (Bright Beginnings) child care facilities, created false employment records on behalf of parents with children at Bright Beginnings in order to establish eligibility for participation in the CCAP.

In addition, the complaint stated that Mr. Roman and other members of his family¹¹ routinely falsified child enrollment and attendance records, in part, by recording attendance for children no longer enrolled at Bright Beginnings, and recording attendance on Saturdays despite the facilities being closed on the weekend.¹²

III. INVESTIGATION

A. Interview Of [Bright Beginnings Former Employee 1]

On March 1, 2016 and August 23, 2016, investigators interviewed [Bright Beginnings Former Employee 1]. [Bright Beginnings Former Employee 1] stated that she was employed by Bright Beginnings from February 2008 to August 2015 as the daycare's manager. [Bright Beginnings Former Employee 1] said her responsibilities included creating employee work schedules, recording the hours that staff worked, monitoring the number of children present at the daycare, and making the children's lunch schedule.

⁸ 02.01.01 Application Process, <http://www.dhs.state.il.us/page.aspx?item=10564> (last visited 8/1/17).

⁹ The client's eligibility for participation in the CCAP is then re-determined approximately every six months, with documentation of the client's employment, education, and child care arrangements re-examined at this time. See 02.03.01 Redetermination, <http://www.dhs.state.il.us/page.aspx?item=10568> (last visited 8/1/17).

¹⁰ The complaint also alleged that Bright Beginnings owners falsified child meal records, and that there were several issues regarding the quality of care being provided at Bright Beginnings, including over-crowding, poor caregiver-to-child ratios, and non-nutritious meals being served to children. Given that these allegations were also referred to the Department of Children and Family Services Inspector General, they are not addressed in this report.

¹¹ During a previous investigation (OEIG Case No. 09-01147), investigators found that Mr. Roman's [Relative 1], fraudulently billed the State for children who did not actually attend her daycare, [Relative 1's Daycare], and was overpaid more than \$200,000 based on the fraudulent billing. As a result of the OEIG's investigation, [Relative 1] and [Relative 1's Daycare] were terminated from the CCAP.

¹² Both Bright Beginnings locations are licensed to operate on Saturdays.

[Bright Beginnings Former Employee 1] stated that during her entire tenure at Bright Beginnings, Jorge Roman falsified documents to say that parents whose children attended Bright Beginnings worked for Bright Beginnings so that the parents would qualify for the CCAP. [Bright Beginnings Former Employee 1] said that Mr. Roman would tell parents who did not actually work for Bright Beginnings that they needed to have their CCAP applications falsified in order to qualify for the program. [Bright Beginnings Former Employee 1] said Mr. Roman would complete the parents' CCAP applications, have them sign, and then would have his secretary bring the completed applications—including the false Wage Verification forms indicating they worked at Bright Beginnings—to the local CCR&R agency. [Bright Beginnings Former Employee 1] stated that if and when a parent obtained actual employment, Mr. Roman would have him or her bring a paystub to Bright Beginnings so they could complete a new Wage Verification form and remove Bright Beginnings as the parent's employer. [Bright Beginnings Former Employee 1] said that Mr. Roman instructed Bright Beginnings employees on how to falsify these documents, and admitted that she and several other Bright Beginnings employees falsified these documents for Mr. Roman while she worked at Bright Beginnings. [Bright Beginnings Former Employee 1] noted that Bright Beginnings' employees use punch cards to document their time at work, and said the parents who did not actually work at Bright Beginnings would not have employee punch cards.

[Bright Beginnings Former Employee 1] stated that Mr. Roman also regularly billed for children that did not attend Bright Beginnings, and signed-in children on days they did not attend in order to reconcile Bright Beginnings' Billing Certificates and attendance records. [Bright Beginnings Former Employee 1] stated that Mr. Roman billed for one parent's children for several years despite the children only actually attending Bright Beginnings for one month; billed for full-time day care for another parent's children despite the children only attending part-time; and billed for other children who never attended Bright Beginnings at all, all while she was employed at Bright Beginnings. [Bright Beginnings Former Employee 1] added that Mr. Roman claimed that Bright Beginnings was open on Saturdays and would tell parents he was going to charge the State for Saturdays, even though Bright Beginnings wasn't actually open on Saturdays.

B. Review Of Documents Relating To Falsification Of Parent Employment

1. CCAP Applications and Illinois Department of Children and Family Services Records

In order to determine whether Mr. Roman falsified CCAP applications regarding parents' employment at Bright Beginnings, investigators first obtained all CCAP applications and redetermination forms for all children who attended Bright Beginnings at any point during 2014 or 2015, and reviewed these documents for the applicants' reported employment.

A review of the applications revealed that 18 different parents listed Bright Beginnings as their employer at the time they submitted one or more CCAP application or redetermination form between June 2013 and at least March 2016. In addition, investigators determined that Jorge Roman's name was signed on each corresponding Wage Verification form, certifying that these

parents were employed by Bright Beginnings at the time of their application or redetermination form submission.¹³

After compiling this list of parents whose CCAP documents indicate they were employed by Bright Beginnings, investigators obtained various documents that Bright Beginnings submitted to the Illinois Department of Children and Family Services (DCFS) between January 2010 and May 2016 for licensing purposes that included the names of its employees throughout this period.¹⁴

A review of these DCFS documents showed that only 10 of the 18 parents who claimed to be employed by Bright Beginnings on their CCAP applications or redetermination forms were reported by Bright Beginnings as employees at any point during this period of time.

2. Subpoena to Bright Beginnings

In addition to obtaining documents from DHS and DCFS, the OEIG issued a subpoena to Bright Beginnings on February 1, 2017 for documentation to verify the employment of these parents. This request included a list of alleged Bright Beginnings employees, the dates of employment of these 18 parents, and timekeeping and payroll records for each.¹⁵

Bright Beginnings did not produce any documents in response to the OEIG's subpoena by the date requested, and further attempts by investigators over the next several months to obtain either the subpoenaed documents or any written response were ignored.¹⁶

C. Review Of Documents Relating To Falsification Of Bright Beginnings' Billing Certificates And Attendance Records

¹³ Investigators note that a Wage Verification form was not attached to one of the applications submitted by a particular parent; however, this application indicated this parent was employed by Bright Beginnings, and subsequent Wage Verification forms for this parent were signed in Mr. Roman's name.

¹⁴ All child care facilities are required to submit a report of individuals they employ to their Licensing Representative as part of the licensing process, and must submit updated reports when staff changes occur. The facilities must also provide DCFS with a copy of a form on each employee that details information such as the employee's previous employment, references, and educational background, and more. *See* DCFS Forms 508 and 508-1.

¹⁵ As part of DCFS' licensing standards for daycare centers, Bright Beginnings is required to maintain personnel records for each staff member employed. These records must include the above-detailed form, as well as proof of the individual's educational achievement, verification of previous experience, written character references, and more. *See* 89 Ill. Admin Code 407.120.

¹⁶ Throughout this time, Bright Beginnings was represented by [Attorney]. During a March 20, 2017 phone call between [Attorney] and investigators, the OEIG asked that Bright Beginnings provide the documents requested in the subpoena, or provide something in writing stating that Bright Beginnings did not have the documents requested or would not be providing the documents requested. During this conversation, [Attorney] informed investigators that he would not put anything in writing to the OEIG about Bright Beginnings' lack of response to the subpoena. On June 23, 2017, investigators again spoke with [Attorney] and renewed their previous request that Bright Beginnings comply with the subpoena or indicate in writing that they would not be producing the requested documents. On June 26, 2017, investigators sent [Attorney] a certified letter confirming the June 23, 2017 discussion and again requested that Bright Beginnings comply with the OEIG's subpoena by July 7, 2017, or confirm in writing the reason for Bright Beginnings' noncompliance. The OEIG subsequently received notice that the certified letter to [Attorney] was received at his office on June 29, 2017. The OEIG, however, never received a response from Bright Beginnings or [Attorney].

1. Review of Bright Beginnings' Billing Certificates

In order to determine whether Bright Beginnings falsified child attendance records and monthly CCAP Billing Certificates, investigators first obtained all of the Billing Certificates submitted by Bright Beginnings for payment between June 2015 and July 2016. A review of these documents revealed that Bright Beginnings consistently billed for between approximately 75 and 100 children on a full-time basis each month, across Bright Beginnings' two locations.¹⁷

2. Subpoena to Bright Beginnings

On each CCAP application, there is a Provider Certification page that requires the childcare provider to certify they "will maintain, for a minimum of five (5) years from the date of payment, daily attendance records to fully document the extent of services provided." Mr. Roman's signature appeared on numerous Provider Certification pages reviewed as part of the investigation. Given this requirement, the OEIG requested Bright Beginnings' child attendance records and parent sign-in sheets from June 2015 to July 2016 as part of its February 2017 subpoena to Bright Beginnings.

As discussed above, Bright Beginnings did not produce any documents in response to the OEIG's subpoena by the date requested, and subsequent attempts by investigators to obtain the subpoenaed documents yielded no result. Accordingly, investigators were unable to compare Bright Beginnings' monthly Billing Certificates with any type of child attendance record.

IV. INVESTIGATION REGARDING SPECIFIC CCAP CLIENTS

As part of the investigation, the OEIG sought to interview CCAP clients whose applications stated that they worked at Bright Beginnings, and that their children were attending Bright Beginnings. While the OEIG attempted to contact several of these parents, only three were responsive to investigators: [Bright Beginnings Parent 1], [Bright Beginnings Parent 2], and [Bright Beginnings Parent 3].

During [Bright Beginnings Former Employee 1]'s March and August 2016 interviews, investigators asked her about these parents. [Bright Beginnings Former Employee 1] stated that she knew [Bright Beginnings Parent 1] and [Bright Beginnings Parent 2], and that each had children who attended Bright Beginnings at some point while [Bright Beginnings Former Employee 1] was employed there. [Bright Beginnings Former Employee 1] stated that [Bright Beginnings Parent 1] and [Bright Beginnings Parent 2] never worked for Bright Beginnings, but that Mr. Roman falsely reported they did so that each could qualify for the CCAP. [Bright Beginnings Former Employee 1] added that she specifically recalled submitting CCAP applications and Wage Verification forms for [Bright Beginnings Parent 1] and [Bright Beginnings Parent 2] so they could qualify for the CCAP. [Bright Beginnings Former Employee 1] stated that she also knew [Bright Beginnings Parent 3], and that [Bright Beginnings Parent 3]'s children

¹⁷ A review of Bright Beginnings' two daycare center licenses obtained from DCFS revealed that each location is licensed to be open six days a week, including Saturday. The licenses further revealed that one Bright Beginnings location is licensed to care for 47 children each day, while the other is licensed to care for 53 children each day, and also at night.

attended Bright Beginnings while [Bright Beginnings Former Employee 1] was employed there. [Bright Beginnings Former Employee 1] stated that [Bright Beginnings Parent 3]’s children stopped attending Bright Beginnings around November 2015. [Bright Beginnings Former Employee 1] added that [Bright Beginnings Parent 3] worked for Jorge Roman’s [Relative 2] at her home daycare.

A. Interviews Of [Bright Beginnings Parent 1] And [Bright Beginnings Parent 2]

On November 9, 2016, and November 15, 2016, respectively, investigators interviewed [Bright Beginnings Parent 1] and [Bright Beginnings Parent 2].¹⁸ During their interviews, both [Bright Beginnings Parent 1] and [Bright Beginnings Parent 2] stated that they were familiar with Bright Beginnings and had worked at Bright Beginnings in the past. [Bright Beginnings Parent 1] and [Bright Beginnings Parent 2] both added that they were paid in cash by Mr. Roman, and did not pay income tax on the money received from Mr. Roman or Bright Beginnings.

[Bright Beginnings Parent 1] and [Bright Beginnings Parent 2] stated that their children attended Bright Beginnings while they were employed there, and said they recalled completing CCAP applications stating that Bright Beginnings was their child care provider. [Bright Beginnings Parent 1] added that she would complete portions of her CCAP applications and sign them, and then Mr. Roman would complete the corresponding Wage Verification form, and [Bright Beginnings Parent 2] added that she recalled completing her CCAP applications with the help of Mr. Roman or his secretary.

B. Interview Of [Bright Beginnings Parent 3]

On November 15, 2016 and November 16, 2016, investigators interviewed [Bright Beginnings Parent 3].¹⁹ [Bright Beginnings Parent 3] stated that she worked for Jorge Roman at Bright Beginnings for approximately two months beginning in August or September 2013, and then began working for Mr. Roman’s [Relative 2] at her home daycare in October 2013. [Bright Beginnings Parent 3] stated that she remained employed by [Relative 2] until June 2015. [Bright Beginnings Parent 3] stated that she did not know anything about the CCAP program before she began working for the Roman family and was informed by Mr. Roman that she would be eligible for CCAP benefits.

[Bright Beginnings Parent 3] stated that her two children attended Bright Beginnings from approximately June 2013 to early June 2015, when they began an afterschool program at John L. Marsh Elementary School.

Investigators showed [Bright Beginnings Parent 3] five CCAP application/redetermination forms²⁰ for her children, dated September 2013, December 2013, June 2014, November 2014, and

¹⁸ The interviews of [Bright Beginnings Parent 1] and [Bright Beginnings Parent 2] were conducted in their primary language of Spanish by an OEIG investigator fluent in Spanish.

¹⁹ [Bright Beginnings Parent 3]’s interviews were also conducted in Spanish by an OEIG investigator fluent in Spanish.

²⁰ After a CCAP applicant is approved for benefits, the applicant must submit periodic redetermination forms. The redetermination forms require the same information as the original application including a parent/guardian

May 2015,²¹ that were signed in her name and submitted to her local CCR&R agency so that [Bright Beginnings Parent 3]’s eligibility for the CCAP could be determined. Each application stated that [Bright Beginnings Parent 3] was employed by Bright Beginnings, and that her children would be attending Bright Beginnings. The following table is a summary of relevant information contained in these applications.

Application Date	Parent’s Employer	Employment Schedule	# of Children	Child Care Provider	Child Care Schedule	Employment Verified By
9/18/13	Bright Beginnings	M-F 4pm-9pm	2	Bright Beginnings	M-F 4pm-9pm	Jorge Roman
12/9/13	Bright Beginnings	M-F 4pm-9pm	2	Bright Beginnings	M-F 4pm-9pm	Jorge Roman
6/1/14	Bright Beginnings	M-F 4pm-9pm	2	Bright Beginnings	M-F 4pm-9pm	Jorge Roman
11/19/14	Bright Beginnings	M-F 4pm-9pm	2	Bright Beginnings	M-F 4pm-9pm	Jorge Roman
5/11/15	Bright Beginnings	M-F 4pm-9pm	2	Bright Beginnings	M-F 4pm-9pm	Jorge Roman

[Bright Beginnings Parent 3] stated that she recalled completing two or three CCAP applications for her children while they attended Bright Beginnings, but did not complete any of the above listed CCAP applications shown to her by OEIG investigators. [Bright Beginnings Parent 3] stated that she did not work at Bright Beginnings at the time of these five applications, except for the September 2013 application. [Bright Beginnings Parent 3] noted that the work and child care schedules listed on the five applications were incorrect. [Bright Beginnings Parent 3] denied it was her signature on the parent/guardian certification for the September 2013, December 2013, and June 2014 applications, and added that the name used for the parent signature was “[Bright Beginnings Parent 3’s Former Name]” which she stated was not her name at the time of those applications.

[Bright Beginnings Parent 3] said she recognized the handwriting on the September 2013, December 2013, and November 2014 applications to be that of Jorge Roman. [Bright Beginnings Parent 3] admitted that her signature appears on the November 2014 application, but said she could not recall if the application was blank when she signed it. [Bright Beginnings Parent 3] added that it was her signature on the May 2015 application and the wage verification form, but said she did not fill in the rest of the application.

[Bright Beginnings Parent 3] stated that she did not authorize Bright Beginnings to file any CCAP applications on her behalf at any time. [Bright Beginnings Parent 3] added that she received a letter from DHS not long before her OEIG interview saying that she had been removed from the CCAP, and found this odd because her children had not attended Bright Beginnings since June 2015.

certification page that must be signed by the parent/guardian. For purposes of this report, both applications and redetermination forms will be referred to as “applications.”

²¹ There was an additional application dated November 30, 2015 containing the same information as the five shown to [Bright Beginnings Parent 3]. Because this application was discovered after her interviews, [Bright Beginnings Parent 3] was not asked about it.

C. Review Of Billing Certificates For [Bright Beginnings Parent 3]’s Children

The OEIG obtained all CCAP applications and monthly billing certificates submitted for [Bright Beginnings Parent 3]’s children for the months of June 2015 to October 2016 to determine whether Bright Beginnings was billing for [Bright Beginnings Parent 3]’s children after they stopped attending Bright Beginnings.

A review of the certificates received showed that Bright Beginnings continued submitting monthly certificates for [Bright Beginnings Parent 3]’s children after they stopped attending in June 2015. Bright Beginnings claimed services for one of [Bright Beginnings Parent 3]’s children through January 2016, and the other through July 2016. Payment vouchers and direct deposit receipts obtained from the Illinois Office of the Comptroller show that Bright Beginnings was paid \$15,192.40 for the alleged services provided to [Bright Beginnings Parent 3]’s children after June 2015 through July 2016.²²

V. ATTEMPTED INTERVIEW OF JORGE ROMAN

On July 13, 2017, investigators attempted to interview Bright Beginnings’ owner Jorge Roman regarding the allegations. While Mr. Roman, and his attorney, appeared for his scheduled interview with OEIG investigators, Mr. Roman stated he would be exercising his 5th Amendment right and would not answer any of the OEIG’s questions.

VI. ANALYSIS

A. Jorge Roman’s Mismanagement Of Bright Beginnings Academy

Jorge Roman, the owner of Bright Beginnings Academy, created a system that improperly allowed individuals to qualify for CCAP benefits through the falsification of employment documents. Former Bright Beginnings Manager [Bright Beginnings Former Employee 1] admitted that throughout her entire employment at Bright Beginnings, Mr. Roman, herself, or others staff, on Mr. Roman’s behalf, falsified documents to say that parents whose children attended Bright Beginnings worked for the daycare center so that they could qualify for the CCAP. In addition, the investigation revealed that Bright Beginnings falsified [Bright Beginnings Parent 3]’s CCAP applications forms claiming that she worked at Bright Beginnings when in fact she was not working there. [Bright Beginnings Parent 3] admitted that she did not work at Bright Beginnings after October 2013, and when shown five applications and redetermination forms that listed Bright Beginnings as her employer, stated that she did not fill out the employment information on any of them. [Bright Beginnings Parent 3] also noted several errors and discrepancies on the forms that undoubtedly would not have been on them had she completed them herself, such as the use of her former last name and incorrect work and child care schedules. Further, [Bright Beginnings Parent 3] stated that she recognized the handwriting on at least some of the applications to be that of Bright Beginnings’ owner, Jorge Roman. The falsification of parents as employees is further supported by the fact that 18 parents listed Bright Beginnings as

²² On April 5, 2017, the OEIG referred this information to the Office of the Illinois Attorney General, pursuant to 5 ILCS 430/20-80, because the loss of public funds was over \$5,000 and could give rise to criminal penalties.

their employer when applying for the CCAP between June 2013 and March 2016, yet documents that Bright Beginnings itself submitted to DCFS during the same time period listed only 10 of these parents as employees.

Mr. Roman had multiple opportunities to explain any misunderstanding regarding who he employed at Bright Beginnings; however, when asked to provide employment records to support the assertion that these 18 parents actually worked at Bright Beginnings, Mr. Roman failed to provide any such documentation and refused to be interviewed. Ultimately, the employment records sought by the OEIG should have been maintained by Bright Beginnings as required by DCFS licensing standards,²³ and should not have been difficult to produce. Bright Beginnings' failure to provide any such documentation indicates that this daycare either does not maintain standard employment records, or willingly failed to cooperate with an OEIG investigation. Whatever the reason, at the very least, Bright Beginnings' failure to maintain or provide employment records to substantiate its operations and its employees amounts to serious mismanagement that should not be taken lightly. Given the forgoing, the OEIG concludes that Mr. Roman has mismanaged Bright Beginnings Academy, and is unfit to operate a child care business that receives significant funding from the State through its participation in the CCAP. Accordingly, the allegation that Bright Beginnings Academy, a vendor receiving State funds pursuant to the CCAP, has been mismanaged by owner Jorge Roman is **FOUNDED**.²⁴

B. Falsification Of CCAP Billing Certificates

[Bright Beginnings Parent 3] told OEIG investigators that her children attended Bright Beginnings from approximately June 2013 until early June 2015 when they began an afterschool program at a local elementary school. However, a review of Bright Beginnings' monthly Billing Certificates revealed that Bright Beginnings continued to bill for one of [Bright Beginnings Parent 3]'s children until January 2016, and another until July 2016. Payment vouchers and direct deposit receipts obtained from the IOC show that Bright Beginnings was paid \$15,192.40 for child care services purportedly provided to [Bright Beginnings Parent 3]'s children after June 2015. This evidence is corroborated by former Bright Beginnings manager [Bright Beginnings Former Employee 1]. According to [Bright Beginnings Former Employee 1], Mr. Roman regularly falsified child attendance records and Billing Certificates for children who did not attend Bright Beginnings. [Bright Beginnings Former Employee 1] also recalled that [Bright Beginnings Parent 3]'s children stopped attending Bright Beginnings in 2015, although she thought it was around November 2015.

Further, Bright Beginnings is required by the CCAP to maintain child attendance records to fully document the extent of services for which it bills the State. When the OEIG attempted to obtain such records from Bright Beginnings in order to substantiate its Billing Certificates for [Bright Beginnings Parent 3]'s children after June 2015, Bright Beginnings failed to produce any such documentation, and Mr. Roman refused to answer the OEIG's questions.

²³ See 89 Ill. Admin Code 407.120.

²⁴ The OEIG concludes that an allegation is "founded" when it has determined that there is reasonable cause to believe that a violation of law or policy has occurred, or that there has been fraud, waste, mismanagement, misconduct, nonfeasance, misfeasance, or malfeasance.

Given the foregoing, the OEIG concludes there is sufficient evidence that Mr. Roman or other Bright Beginnings staff falsified the CCAP Billing Certificates submitted for [Bright Beginnings Parent 3]’s children between June 2015 and July 2016. Accordingly, the allegation that Bright Beginnings falsified CCAP Billing Certificates by stating that the children of [Bright Beginnings Parent 3] attended Bright Beginnings when they did not is **FOUNDED**.

C. Failure To Maintain Records To Support Billings To The State

As previously noted, as a CCAP provider, Bright Beginnings is required to maintain child attendance records to fully document the extent of services provided for a minimum of five years from the date of payment by the State for the services billed for. On February 1, 2017, the OEIG issued a subpoena to Bright Beginnings for numerous documents relevant to the investigation, including child attendance records and parent-sign in sheets from 2015 and 2016 that would support Bright Beginnings’ monthly CCAP Billing Certificates during this period. After failing to receive a response from Bright Beginnings by the subpoena’s due date, investigators made several attempts over the following months to obtain a response from Bright Beginnings through its attorney. Despite the OEIG’s efforts, Bright Beginnings never produced the requested records.

Given that Bright Beginnings failed to produce any child attendance records when requested by the OEIG and failed to provide any explanation as to why the records were not being produced, there is sufficient evidence to conclude that Mr. Roman, as the owner of Bright Beginnings, either did not maintain these records as required, or obstructed the OEIG’s investigation by refusing to provide these records. Accordingly, this allegation is **FOUNDED**.

VII. FINDINGS AND RECOMMENDATIONS

As a result of its investigation, the OEIG concludes that there is **REASONABLE CAUSE TO ISSUE THE FOLLOWING FINDINGS:**

- **FOUNDED** – Jorge Roman mismanaged Bright Beginnings Academy, a licensed daycare center and a vendor receiving State funds pursuant to the CCAP.
- **FOUNDED** – Bright Beginnings Academy falsified CCAP Billing Certificates by stating that [Bright Beginnings Parent 3]’s children attended Bright Beginnings after June 2015.
- **FOUNDED** – Jorge Roman either failed to maintain records that were required to be kept by a CCAP provider, or obstructed the OEIG’s investigation by refusing to provide these records.

Given the fraud and mismanagement committed by Mr. Roman related to the CCAP, the OEIG recommends that Bright Beginnings be terminated as a provider from the CCAP and no longer receive funding from DHS for providing child care services. The OEIG also recommends that any other daycare center owned or operated by Mr. Roman be prohibited from participating in the CCAP.

Based on Bright Beginnings failure to provide employment records, the OEIG recommends that DCFS review Bright Beginnings’ license and ensure that Bright Beginnings is maintaining the proper records as it relates to personnel and staffing.

Further, the investigation revealed that Mr. Roman falsified monthly Billing Certificates for [Bright Beginnings Parent 3]'s family and received more than \$15,000 for services not actually provided to her children. The OEIG recommends DHS undertake efforts to recoup funds paid to Bright Beginnings for the falsified submissions of services provided to [Bright Beginnings Parent 3]'s children from June 2015 to July 2016.

In addition, the OEIG will refer this matter to the Office of the Illinois Attorney General to determine whether any action is appropriate with regard to Mr. Roman's failure to provide child attendance records in response to the OEIG's repeated requests.

No further investigative action is warranted and this case is considered closed.

Date: October 11, 2017

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October 31, 2017

***Via e-mail to Fallon Opperman, Deputy Inspector General and Chief of Chicago Division,
on behalf of:***

Maggie Hickey

Executive Inspector General

Office of the Executive Inspector General for the Agencies of the Illinois Governor

69 West Washington Street, Suite 3400

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RE: Response to the Final Report for Complaint 15-02389

Dear Executive Inspector General Hickey:

This letter responds to the Final Report for Complaint Number 15-02389, attached. The Report essentially makes several findings against a Provider in the Child Care Assistance Program. It also makes several recommendations.

The Department of Human Services will respond to your letter by November 30, 2017. If you have any questions, please feel free to contact Robert J. Grindle, DHS' Ethics Officer.

Regards,


James T. Dimas
Secretary 



Bruce Rauner, Governor

James T. Dimas, Secretary

100 South Grand Avenue, East • Springfield, Illinois 62762
401 South Clinton Street • Chicago, Illinois 60607

November 29, 2017

***Via e-mail to Fallon Opperman, Deputy Inspector General and Chief of Chicago Division,
on behalf of:***

Maggie Hickey

Executive Inspector General

Office of the Executive Inspector General for the Agencies of the Illinois Governor

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Chicago, Illinois 60602

RE: Updated Response to the Final Report for Complaint 15-02389

Dear Executive Inspector General Hickey:

This letter updates a response to the Final Report for Complaint Number 15-02389 previously provided. The Report essentially makes several findings against a Provider in the Child Care Assistance Program (CCAP). It also makes several recommendations. Those recommendations are being followed. The Department of Human Service has initiated steps to follow the recommendations. Currently, staff are reviewing materials provided by your office and other relevant materials.

To complete the steps required to follow the recommendations will take some time. Your office will be updated as the process moves along. If you have any questions, please feel free to contact Robert J. Grindle, DHS' Ethics Officer.

Regards,

James T. Dimas
Secretary

Illinois Department of
DCFS
Children & Family Services

Bruce Rauner
Governor

Beverly J. Walker
Acting Director

February 8, 2018

Via email and U.S. Mail

Colleen Thomas
Deputy Inspector General and
Chief of Chicago Division
Office of Inspector General of the Illinois Governor
69 W. Washington, Ste. 3400
Chicago, Illinois 60602

In re: OEIG case no. 15-02389

Dear Ms. Thomas:

Illinois Department of Children and Family (“DCFS”) has adopted your recommendation in OEIG Case No. 15-02389 that the DCFS review the status of the daycare license and ensure that Bright Beginnings is maintaining proper records as it relates to personal and staffing for Bright Beginning daycare. After review, it has been determined that Bright Beginning daycare has temporarily closed its daycare operations and the owner states that he is attempting to sell the facilities. DCFS has to continually monitor the facility to assure closure with unannounced visits until there is a surrender of the license. The facilities application for renewal is due March 25, 2018. If the facility should reopen, DCFS will review personal and staffing for Bright Beginning daycare. The facilities license is set to expire in June of 2018. Should you have any questions or concerns, please do not hesitate to contact me at the telephone listed below. Thanks for your immediate attention.

Sincerely,

Shawn Eddings,
General Counsel

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