



‘Being Accessible Is a Big Deal’

Municipal liaison connects OIG to local governments



“By going out into the communities we have a great chance to hear firsthand from those who do the public’s work day in and day out . . . We hear a lot of feedback during our ‘municipal days’ and are always working on ways that our team here at the OIG can use that information to help government officials protect public resources.”

-Kristyn Taylor, Municipal Liaison

Local leaders should not be surprised if they soon hear from Kristyn Taylor, the Office of the Inspector General’s new municipal liaison who coordinates the OIG’s local government engagement efforts.

Since joining the OIG in December 2024, Taylor and IG Shapiro have visited with dozens of local officials across the Commonwealth’s cities and towns.

Kristyn Taylor joined the OIG in December 2024 as municipal liaison.

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IG Shapiro Eyes Commuter Rail Fare Collections

“The MBTA must capitalize on every revenue dollar available from transit service, promote transparency, and be accountable to the MBTA budget.”

-IG Jeffrey Shapiro

With budget shortfalls making every transportation dollar more critical than ever, Inspector General Shapiro recently called on Massachusetts Bay Transportation Authority General Manager and CEO Phillip Eng to improve fare collection on the MBTA’s commuter rail lines.



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A Word from Inspector General Jeffrey S. Shapiro

An Independent Force for Good Government



Good day.

In 1980, the Legislature, acting on a recommendation of the Ward Commission, the blue ribbon commission created to address widespread corruption in the awarding of state and county building contracts, passed legislation that created the Massachusetts Office of the Inspector General (OIG). The law established the first statewide inspector general's office in the country, and the Massachusetts OIG remains the only inspector general's office in the nation with both state and municipal oversight.

The Inspector General is appointed to a five-year term by a majority vote of the Governor, Attorney General, and Auditor. The Inspector General can only be removed for cause by a majority vote of the appointers, along with a publicly available, written rationale. In this way, the Inspector General maintains an apolitical, independent office. This structure ensures the objectivity of the office and allows us to pursue investigations of fraud, waste, and abuse without fear or favor.

I share this information because I recently testified before the Delaware State Senate Executive Committee and will testify this month for a second time before the Rhode Island House Finance Committee on those states' respective proposals to create an office of the inspector general. In doing so, I have a keener appreciation for the model of independent government oversight that we have in Massachusetts.

As I travel around the Commonwealth meeting with state, county, and municipal officials, I have the opportunity to interact with public employees truly committed to the people and communities they serve. By listening to the concerns of my fellow government leaders and understanding the challenges they face as public servants, I believe the OIG amplifies its role as a force for good government. I further believe we can equip our governmental partners with the right information and tools to build systems and controls that not only contribute to effective governance, but also protect public resources from fraud, waste, and abuse.

Best,

Jeffrey S. Shapiro, Esq., CIG

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-IG Jeffrey Shapiro



Protect Your Community

If you suspect fraud, waste, or abuse of public funds, you can confidentially report your concerns.



Fill out our
Fraud Reporting Form



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IGO-FightFraud@mass.gov

Have a Question About
Chapter 30B?



Send us an email at
OIGProcurementSupport@mass.gov

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IG Shapiro Eyes Commuter Rail Fare Collections

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IG Shapiro wrote in a March 4, 2025 [public letter](#) to Eng that Keolis Commuter Services, the MBTA's rail operator since 2014, is not honoring its contractual obligation to collect tickets and fares from passengers, especially on trains running to and from South Station.

Because automatic fare gates have not been installed at South Station, Back Bay Station, or suburban stations, the responsibility for checking tickets or collecting cash fares lies with on-board commuter rail conductors. The conductors are not always making their required rounds, IG Shapiro wrote.

"I believe that the scale of the problem of uncollected fares and the resulting lost revenue has been greatly understated over the years," IG Shapiro wrote. "In many ways, the MBTA has not prioritized fare collection, as demonstrated by the lack of infrastructure to achieve that goal and the treatment of fare collection as an element of the passenger experience rather than the necessary revenue driver it should be."

IG Shapiro emphasized that the problem is one of fare collection, not fare evasion. Conductors are not checking fares as the Keolis contract requires.

"Conductors must collect fares whether or not fare gates exist. That does not happen dependably or consistently," IG Shapiro said.

Making fare collection a "real and achievable priority" is even more important given the recent debut of the South Coast rail service, IG Shapiro continued. Furthermore, with the Keolis contract set to expire in mid-2027, the MBTA will soon commence the procurement process for the next commuter rail operator contract. While immediate steps must be taken to boost conductor performance, IG Shapiro encouraged General Manager Eng to contemplate a comprehensive fare collection strategy for the new contract.

"The MBTA's thinking about fare gates and fare collection needs to change. Whether this means that the next operator needs to own the responsibility for installing fare gates and the MBTA needs to hold it accountable through a combination of not only revenue share but clear penalties for not getting there, the MBTA needs to aggressively manage the contract," Shapiro wrote. "The MBTA must capitalize on every revenue dollar available from transit service, promote transparency, and be accountable to the MBTA budget."

General Manager Eng has said that fare gates will be deployed at South Station and Back Bay Station later this year.

"Robust fare collection is a matter of quality, integrity and efficiency in the operation of the MBTA . . . [T]he commuter rail operator's failure to collect fares and the MBTA's failure to enforce the operator's obligation to collect fares is waste and abuse."

-IG Jeffrey Shapiro



Recent Investigations and Case Updates

“While the OIG did not find fraud in its investigation, it is very clear to see how inconsistent procedures and lax oversight create an environment ripe for fraud.”

-IG Jeffrey Shapiro

OIG Asks Town to Toughen Credit Card Policies

The OIG issued a [letter](#) on March 18 outlining its findings arising from a review of the town of Orange’s use of a town credit card.

In the letter to the Orange town administrator and Select Board chair, the OIG explained that a review of the town’s practices during the period from June 2019 through April 2023 showed that it lacked formal procedures regarding credit card use and payments. The OIG found that the town made credit card payments based on handwritten notations from invoices, without reconciling payments with the account statements. This informal process resulted in overpayments that ultimately served as credits against future charges. In addition, the process contributed to the town paying sales tax on purchases in some instances, despite a sales tax exemption provided by state law.

While the OIG’s analysis did not find fraud, Inspector General Shapiro stressed that the lack of established policies for the town credit card created the opportunity for fraud and waste of public dollars.

“[T]he town of Orange is fortunate that its ill-defined accounts payable process and lax oversight of town credit card expenditures did not result in misappropriated funds. Implementing rigorous policies on reconciliations and credit card use will assist the town in being an effective, transparent steward of public resources and protect the public treasury from improper use,” Inspector General Shapiro wrote.

During the review period, the town’s credit card account was in the name of a former town administrator. When the former administrator made a purchase on the card, they gave an invoice to the then-town accountant with handwritten payment instructions, but did not provide copies of the credit card statements.

The OIG found that the town’s accounts payable procedures were susceptible to mistakes, payment delays, late fees, and interest charges. The OIG also found that the town accountant’s inability to independently verify credit card payments with statements resulted in overpayments (including one instance in January 2022 in which the town overpaid the account by approximately \$7,500), as well as payments of sales tax. By cross-referencing the town’s accounts payable records with the town’s credit card statements, the OIG discovered multiple discrepancies, with numerous instances of payments recorded in the town’s accounts payable records not reflected in the credit card statements.

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The OIG's letter concluded with a core recommendation that the town of Orange strengthen its accounts payable procedures and controls related to credit cards. In particular, the OIG asked the town to create formal policies regarding the opening and closing of credit card accounts, employees' use of those cards, and a payment reconciliation process. Accompanying recommendations suggested that the town conduct an audit of all credit card accounts used by the town and stop using active credit card accounts until written policies are in place. The OIG also asked the town to implement appropriate offboarding procedures for departing employees who have account access, including a process to notify banks and credit card companies of the change in authorization.

Former State Employee Sentenced to 10 Months for Defrauding Housing Agency

In March 2025, following a joint federal-state investigation, former Executive Office of Housing and Livable Communities (EOHLC) employee Alihea Jones was sentenced to 10 months in prison to be followed by three years of supervised release. She was also ordered to pay \$222,074 in restitution for defrauding her former employer, as well as the U.S. Small Business Administration.

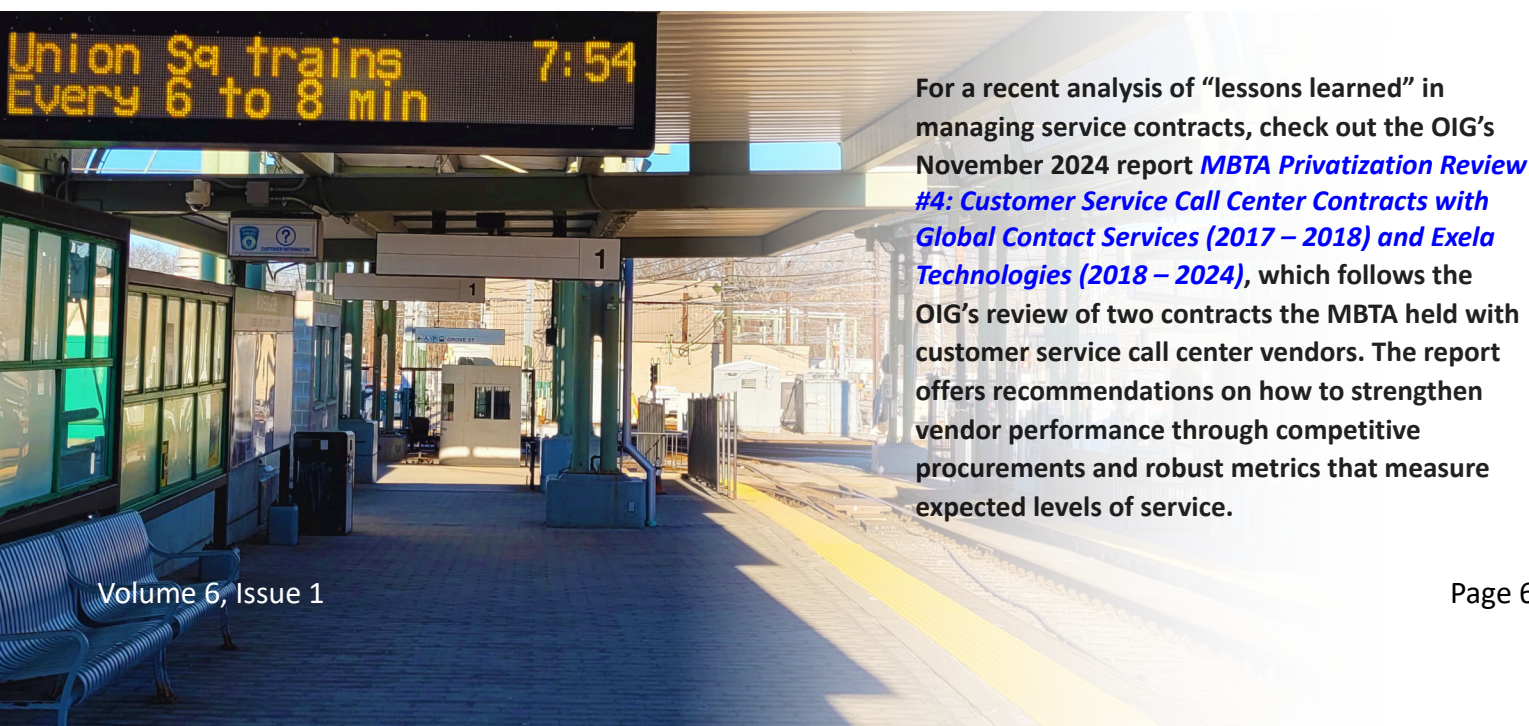
Jones worked for EOHLC for six months in 2022. Following her termination, she logged into EOHLC's system and approved four Residential Assistance for Families in Transition (RAFT) applications for a combined amount of \$33,225. Jones altered the routing and account numbers of the approved applications so that two were paid to accounts she held. The other two were paid to acquaintances, who each paid Jones \$2,000 in kickbacks.

Earlier the same year, Jones fraudulently obtained a \$187,000 Paycheck Protection Program loan for her business, Beauty Concepts, by falsely claiming that her business had employees and payroll expenses.

Jones pleaded guilty to five counts of wire fraud. The Public Corruption Unit of the U.S. Attorney's Office for the District of Massachusetts prosecuted the case.

"I appreciate the work of my law enforcement partners in the U.S. Attorney's Office and the U.S. Postal Inspection Service in holding this defendant to account. Not only did her actions deprive others of much needed assistance during the pandemic, but they also undermined faith in government."

-IG Jeffrey Shapiro



For a recent analysis of "lessons learned" in managing service contracts, check out the OIG's November 2024 report [MBTA Privatization Review #4: Customer Service Call Center Contracts with Global Contact Services \(2017 – 2018\) and Exela Technologies \(2018 – 2024\)](#), which follows the OIG's review of two contracts the MBTA held with customer service call center vendors. The report offers recommendations on how to strengthen vendor performance through competitive procurements and robust metrics that measure expected levels of service.

'Being Accessible Is a Big Deal'

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"We've met with mayors, town managers, finance directors, housing authority directors, school superintendents, and chambers of commerce. Every jurisdiction has different priorities, and it's a learning experience for us to see how these local officials and agencies are conducting their business and how we can be a resource to them to prevent fraud, waste, and abuse in the expenditure of public funds," Taylor says.

Taylor's move to the OIG extends an already robust career in state government. The Medford native brings two decades of public sector experience to her municipal role at the OIG, having previously worked in legislative positions for Reps. Karyn Polito, Brad Hill, and Angelo D'Emilia in the Massachusetts House.

"I began working for the Massachusetts Legislature in 2005, and much of my work there involved generating awareness for various policy agendas and collaborating with legislators, agencies, local officials, and various interest groups in support of legislative and local priorities," Taylor says. "I saw an opportunity in the OIG to see the work of state government through a different lens and directly promote transparency and efficiency in our government."

IG Shapiro created the municipal liaison role as a vehicle to further his objective of making government work better for all.

"By going out into the communities we have a great chance to hear firsthand from those who do the public's work day in and day out. What are the positive things that are going on? What challenges do they face? There may be opportunities for the OIG to better understand procurement-related challenges so that we can provide education, issue informative advisories, or even look for legislative solutions," Taylor says. "We hear a lot of feedback during our 'municipal days' and are always working on ways that our team here at the OIG can use that information to help government officials protect public resources."

Taylor looks forward to meeting more local leaders across the Commonwealth.

"I worked in the Legislature for 19 years on the House side. There was a significant learning curve when I first started there, but the more I listened to our constituents, the more I attended meetings, and the more I was out at community events, the more I realized that being accessible is a big deal," Taylor says.

During her time away from the office, Taylor indulges her passion for music.

With vocal training from the Longy School of Music in Cambridge and the New England Conservatory of Music in Boston, Taylor sings opera.

"I have always had a deep love and appreciation for music and have been very fortunate to be able to actively pursue it. I began training in voice at seven, and while I have trained and sung in various styles, opera was always where my heart was called," the soprano says.

She cites Floria Tosca as her favorite performed role.

"Singing opera is a challenging, humbling, and very fulfilling experience and your work on a role or an aria is never completely finished. Art is a living and breathing thing, and it is always evolving and changing. The artist evolves and changes with it."

Taylor also volunteers as president of The Beethoven Society of Melrose, an organization that features professional and amateur musicians who present free public programming in chamber music, opera, musical theater, and jazz.

DON'T MISS

Inspector General Shapiro will present:
Fraud and Abuse Prevention: Navigating State
Procurement Laws Through Education



MASSBUYS EXPO
Thursday, May 1, 2025
11:15 am – 12:15 pm
Gillette Stadium



On the Road with IG Shapiro

Since the start of his tenure as Inspector General, IG Shapiro has made a point to spend several days each month out of the office and meeting with stakeholders across the Commonwealth.

In January, IG Shapiro and other members of the OIG team attended the Massachusetts Municipal Association's Annual Conference at the Boston Convention Center. It was a terrific opportunity to connect with mayors, town administrators and managers, procurement officials, and others. Members of the OIG's Procurement Support team and the OIG Academy were on hand to answer questions.



The following week, IG Shapiro addressed the Cape Cod Association of Public Procurement Officials (CCAPPO) in Hyannis. OIG Academy instructor Susan Scheiner provided an overview of Chapter 30B with added information on the updated procurement process for electric vehicles. Special Funding Oversight Director Michael Frieber provided an overview of steps which municipalities and agencies can take to prepare for the next public emergency.



IG Shapiro also met with Chatham Town Manager Jill Goldsmith to discuss issues of concern to the municipality.



Academy Brings Back In-Person Classes



In his welcoming remarks in March to the first in-person OIG Academy class since the beginning of the pandemic five years ago, IG Shapiro explained to class participants that the Academy will continue to offer a robust catalog of online courses and will be adding more in-person classes to its course offerings.

“We hope to meet you where you are as an adult learner. This is a time of great exploration, as the OIG Academy seeks to provide those course offerings that best align with our mission and your needs.”

-IG Jeffrey Shapiro

OIG Academy Rolls Out New Learning Management System

In his March 6 testimony to the Joint Committee on Ways and Means on the FY26 budget, IG Shapiro noted that a number of the OIG’s technological systems are at the end of their useful life. In the two years since assuming his role, IG Shapiro has made significant investments in modern systems and upgraded hardware. The OIG Academy’s new learning management system is a result of this investment. It provides a user-friendly online interface that streamlines all processes for Academy learners, making it easier for registrants to interact with the Academy. Learners have access to a dashboard where they can register, make payments, and access an updated learning platform. They also have access to their transcripts, certifications, and course materials, all in one place.

With the OIG Academy’s new learning management system, users can:



More easily access and navigate the Academy’s course catalog



Register and pay for courses more easily



Communicate with Academy instructors

Spotlight:

Health Safety Net

As part of its statutorily required review of MassHealth and the Health Safety Net (HSN), the Office of the Inspector General's Healthcare Division (HCD) issued a report in March presenting a statistical overview of the Commonwealth's HSN program. The report, *An Analysis of Health Safety Net Patients, Providers, and Services*, offers insights into the Commonwealth's delivery of healthcare services to residents who rely on the HSN.

The HSN reimburses community health centers and acute hospitals – defined as hospitals licensed under Section 51 of Chapter 111 of the Massachusetts General Laws that contain a majority of medical-surgical, pediatric, obstetric, and maternity beds – for medically necessary services provided to low-income, uninsured, and underinsured Massachusetts residents whose modified adjusted gross income meets certain thresholds. The HCD's report examines the demographic composition of HSN patients during the five-year period from 2019 through 2023. The report also presents statistical information on the healthcare providers who delivered medical, dental, and pharmaceutical services under the HSN during that period. Additionally, the HCD analyzed claims volumes, the most common medical conditions diagnosed, and the most prevalent medical and dental services provided under the HSN.

“Beyond demonstrating how the money is spent, the numbers presented [in the report] also inform foundational elements of the HSN program. The data speaks to questions that stakeholders, including sponsors and funders, should be asking, such as: (1) Is the HSN program serving the right individuals? (2) Are HSN patients receiving the right services? (3) Does the HSN program deliver those services at a reasonable cost? (4) Is the HSN program achieving expected outcomes?”

-IG Jeffrey Shapiro

Volume 6, Issue 1

The HCD's program review gives policymakers valuable information on how the Commonwealth spends hundreds of millions of dollars it dedicates to the healthcare needs of its most vulnerable residents. Inspector General Shapiro is confident that the report's data can also shed light on many aspects of the HSN program.

Several themes emerged from the years reviewed. For example:

- 1. The demographic characteristics of age and gender for HSN recipients remained stable.**
- 2. The number of Massachusetts residents whose care is paid for by the HSN program and who have fallen into the lowest federal income level increased by 20%.**
- 3. Community health centers are the primary providers of dental care for low-income residents.**
- 4. While the majority of pharmaceutical HSN claims were for cardiovascular medications, the bulk of claim payments were for antihyperglycemic medications.**

The report identifies regions in Massachusetts that had the highest concentration of HSN recipients during the review period. Policymakers can cross-reference that data with the number of HSN providers by region, service location, and service type to determine where resources are needed to optimize healthcare access. The report also explains that some areas in Massachusetts may not have enough HSN dental providers to meet residents' needs.

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The HCD pinpointed 279 “super-utilizers” of HSN services. Those individuals had high volumes of medical claims and chronic conditions from 2019 through 2023. The report’s information on super-utilizers can help policymakers understand the medical needs of this subgroup of HSN recipients and develop cost-effective methods of delivering care through alternative services and programs.

“This data can serve as a valuable tool as the Commonwealth works to allocate limited resources in ways that provide impact and effectively deliver intended results.”

-IG Jeffrey Shapiro

Strategies for Managing Unexpected Changes in Grant Funding

The OIG previously issued guidance for jurisdictions on best practices to prepare for an influx of emergency funding. In this issue of the *OIG Bulletin*, we will address the flip side: how to prepare for an earlier-than-expected end of funding with a focus on grant funding. This can happen for many reasons related to either budgetary or policy reasons. This article will give you some practical ways to build resiliency into your programs in case this happens to you.



1. Review all funding sources.

Make sure to understand your jurisdiction’s funding sources and the extent to which it relies on grant funding. Most jurisdictions run programs as subrecipients, so you will need to think beyond your immediate funding source. Consider convening a meeting with key personnel in your jurisdiction, such as program managers, grant managers, chief financial officers, legal counsel, and executive leadership, to identify programs and projects that are dependent on grant funding. Document the risks that could result from a loss of those funds, as well as your plans to address those risks. Also understand the nature of the grants at issue. Is the grant for one year? For multiple years? Have the funds already been drawn down? Check with your legal counsel to understand the contractual obligations of your grantors, including the terms relevant to contract termination.



2. Plan proactively.

Simulate scenarios in which grant funding is reduced or suspended. Consider how your jurisdiction will respond if funding is withdrawn in a week, a month, or later. Also give thought to whether your jurisdiction can preserve the value of ongoing projects supported by grants. For example, can a portion of the project be covered by alternative funding to minimize losses? This is a worthy analysis and a constructive conversation to have, but in many instances it may not be possible to find other funding. Reduced budgets will require you to prioritize programs and projects, so consider their impact, urgency, and alignment with your jurisdiction’s mission. Also think about available resources and whether the program or project has demonstrated progress on key performance indicators.



3. Document everything.

Keep a comprehensive document file, in either electronic or hard copy form, for each grant-funded program and project. Document relevant contracts, program administration plans, monitoring and oversight activities, performance measurements, and decisions to create a narrative of your program. For instance, under 2 C.F.R. 200.337, federal awarding agencies, inspectors general, and their representatives have the right to access “any records of the recipient or subrecipients pertinent to the

Continued on next page

Federal award to perform audits, execute site visits, or for any other official use.” A well-documented, organized file will help demonstrate to awarding agencies, oversight entities, and the public that your jurisdiction is in compliance with relevant rules. It will also show the reasoning behind project decisions.



4. Communicate clearly and quickly.

Stay in contact with your awarding agencies, and keep beneficiaries and program partners, such as vendors and subrecipients, informed about grant-funded programs. If there is a need to limit or end programs, provide timely notice to beneficiaries and subrecipients to the best of your ability. If you identify programs at risk of being terminated, consider advising beneficiaries to prepare for that possibility. Contact jurisdictions with similar programs to understand their strategies to minimize the harmful impact of funding freezes.

Chapter 30B Hot Topics

The OIG provides technical assistance on public procurement-related questions to local officials and the general public on Chapter 30B, otherwise known as the Uniform Procurement Act. Chapter 30B is intended to foster fair competition in public contracting. The law governs the processes that the Commonwealth’s cities, towns, and other local jurisdictions must follow in awarding government contracts for supplies, services, and real property. Chapter 30B also establishes procedures for a municipality’s disposition of surplus supplies and real property.

The topics below illustrate the subjects the OIG’s Public Procurement Technical Support Team recently entertained from localities with questions on navigating Chapter 30B requirements.

Public Procurement Technical Support Team

Telephone: 617-722-8838

Email: OIGProcurementSupport@mass.gov

[Online Form](#)

Emergency procurements

Emergencies happen. You need cleaning supplies during an outbreak of norovirus. A pipe breaks and you have water damage that will cause mold. Your vendor for time-sensitive services unexpectedly stops performing.

Section 8 of Chapter 30B permits local jurisdictions to procure supplies or services without fully complying with the statute’s procedural requirements when “the time required to comply ... would endanger the health or safety of the people or their property.” The benchmark is whether the supplies or services in question are quickly needed to ensure the public health or safety.

When faced with an emergency procurement, remember:

- **Procure only those supplies or services necessary to meet the emergency**
- **Follow Chapter 30B requirements to the extent that you can**
- **Maintain a record of the emergency procurement, including the basis of the emergency, the name of the vendor, and the supplies or services purchased**

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**Electric Vehicles/Electric Vehicle Charging
Infrastructure: Purchasing Strategies Under 30B and
Statewide Contracts**

with presenters from the Operational Services Division

The webinar will explain changes that took effect in February relative to EV procurements, including a change that allows municipalities to procure EVs and charging infrastructure in a single procurement.

Course Catalog - OIG Academy

May 15 - 10-11:30 a.m.
June 17 - 10-11:30 a.m.



Chapter 30B Hot Topics, continued from previous page

- **Submit a record of emergency procurements to the Secretary of the Commonwealth for publication in the *Goods and Services Bulletin***

Keep in mind that being unprepared, *i.e.*, failing to properly anticipate an event, circumstance, or need, is not likely to be justification on its own for proceeding with a procurement on an emergency basis.

When in doubt, consult your procurement team. If anyone on your team has earned the OIG's Massachusetts Certified Public Purchasing Official Designation, they have learned about when and how to conduct emergency procurements.

As best practice, include a memo in your procurement file with a narrative to support your action for the emergency procurement for future internal reference as well as review by oversight or audit officials. It will be helpful to have a record of the rationale for the emergency procurement at the moment in time it was made.

Price indexes and price adjustment clauses

You wish to enter a multi-year contract and are thinking ahead about price changes. You can include price indexes and price adjustment clauses in your contract. You will need to disclose the clauses in your solicitation. They cannot be added after you award the contract.

If you have decided to include price index and price adjustment clauses, the OIG recommends that you use established industry or government price indexes and adjustment clauses that are based on an objective standard. Vendors are more likely to respond to a solicitation with established or government price indexes than one you come up with for your jurisdiction.

For more information about multi-year contracts, see M.G.L. c. 30B, § 12 or [The Chapter 30B Manual](#).

On March 19, the OIG hosted a group of first-year state representatives to acquaint them with the office's mission and work.



Contact the Massachusetts Office of the Inspector General



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Public Procurement Technical Support
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OIG Academy
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(617) 722-8894

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MassDOT Fraud Hotline
MassDOTFraudHotline@mass.gov

Public Procurement Technical Support
OIGProcurementSupport@mass.gov

Training/OIG Academy Inquiries
MA-IGO-Training@mass.gov

Employment Inquiries
IGO-Employment@mass.gov



Class Information

To view the current class schedule and to register for a class electronically, please use the link below. If you have any questions, please contact us at (617) 722-8884.

[Course Catalog](#)

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