

‘Real Rules, Real Practices, Real Impact’

How the MCPPO Program Benefits Municipalities

“The MCPPO program provided the foundation to navigate public procurement confidently, ethically, and effectively.”

-Sonia Castro, Category Manager, Operational Services Division

A city’s bus vendor is consistently off schedule and receives frequent complaints about its drivers’ safety. A school district wants to hire school security guards for the first time and doesn’t know where to start. A town’s water treatment facility needs a part replaced, and only the vendor that supplied the original machinery appears able to provide a compatible part, but at a price that seems excessive.

Choosing the goods or services that best serve the public’s needs can be tricky. Public servants are aware that their constituents expect goods and services that work, but, as the examples above and countless others like them show, spending the public’s money isn’t always simple. It takes smart decision-making and subject expertise, all while staying within the parameters set by Massachusetts law to protect open and fair bidding processes.

Continued on page 9



OIG Academy instructor Christine Hezze teaches an in-person class at 1 Ashburton Place.

Sound Budget Practices Prevent Surprise Shortfalls

A recent OIG investigation examining the Brockton Public Schools’ (BPS) \$18 million budget deficit in Fiscal Year 2023 offers several takeaways for all Commonwealth municipalities and school districts.

In a [December 3 letter to Brockton city and school officials](#), the OIG laid out how Brockton’s mayor, the BPS superintendent, and the school committee did not respond to early warning signs of problems in the school district’s \$218 million budget. In the ensuing months, the same officials were slow to react to a rapidly deteriorating

financial situation that ultimately ballooned into an unprecedented budget crisis. The deficit spiraled out of control notwithstanding that available reports and other information, including concerns raised by finance department personnel, pointed to a need for action.

The OIG’s findings and recommendations to Brockton spell out financial practices and budgetary controls that school leaders should follow to exercise meaningful oversight and avoid illegal deficit spending in their districts.

Continued on page 8

An OIG investigation into a series of construction projects by the Upper Cape Cod Regional Technical School suggests bid-splitting.

Page 7

Learn how appointing a chief procurement officer can help your municipality.

Page 14

A Word from Inspector General Jeffrey S. Shapiro

A Resource for Procuring Goods and Services



Good day.

It has been 45 years since the Special Commission Concerning State and County Buildings, more commonly known as the Ward Commission, issued its 12-volume final report on public corruption in state and county building projects in Massachusetts and recommended the creation of what is now the Office of the Inspector General (OIG). The Ward Commission envisioned that the OIG would occupy a place in the “vast middle ground” between the roles of the State Auditor and the Attorney General. My predecessors and I have shaped the direction of this office in that vein, always with an eye toward our oversight responsibilities.

Because the OIG was created in response to a scandal that wasted billions of public dollars on poorly constructed buildings and sent two officials to jail, public procurement will always lie at the heart of our mission.

The public has a recognized interest in how a governmental entity goes about using the public’s money to purchase anything – a good, service, or land – or to construct or renovate a public building. Consequently, Massachusetts has detailed laws governing those processes. At their core, procurement laws seek to ensure that when the public’s money is spent, it is done fairly, openly, and competitively. The process must be fair – all vendors who are able to provide the good or service should be able to bid. The process must be open – the public should be able to “see” what is happening. And the process must be competitive – the public should expect the best value for each dollar, although neither the OIG nor the procurement law can create a competitive vendor pool where none exists.

That said, I am the first to admit that these laws – Chapters 7C, 30B, and 149 of the Massachusetts General Laws – can be confusing, cumbersome, frustrating, and in some cases outdated. Many of you agree, providing me with feedback on those points when I have met with city and town leaders across the Commonwealth.

That is the reason I continue to advocate for common sense changes to Chapter 30B, the Uniform Procurement Act. I have also separated the OIG’s investigations and procurement support functions to encourage people to contact us for help. Over the past two years, I offered MCPPO training at no cost to every municipality in the Commonwealth and recently launched a similar program for school districts.

Why? Because most public officials are trying to do it right. They are *not* giving the paving contract to a family member. They are *not* splitting a project into smaller parts to avoid competitive procurement requirements. Meanwhile, they *are* frustrated that they can’t get sufficient responses when putting a good or service out to bid or when a general contractor cannot find sub-bidders to complete projects.

To be sure, the OIG doesn’t have a magic fix for these types of frustrations. But we can understand them and do our best to work with legislators and procurement officials to find solutions, where possible, such

as providing flexibility around the type of procurement process that can be used for certain purchases.

In these pages, you can read more information on conducting procurements, with helpful articles on the OIG's MCPPO Designation, the value of a municipal Chief Procurement Officer, and what "bid splitting" looks like.

I welcome your feedback and the opportunity to discuss how the OIG can serve you as a resource on procurement questions. Thank you for all you do on behalf of your agencies, communities, and organizations to make government work better tomorrow than it did today.

Best,

A handwritten signature in blue ink, appearing to read "J S Shapiro".

Jeffrey S. Shapiro, Esq., CIG



In This Issue

- 1** 'Real Rules, Real Practices, Real Impact': How the MCPPO Program Benefits Municipalities
- 1** Sound Budget Practices Prevent Surprise Shortfalls
- 5** Recent Investigations and Case Updates
 - 5** Nonprofit Founder Pleads Guilty to Stealing Thousands
 - 5** Guilty Plea to Pandemic-Related Fraud Charges
 - 6** Former Parks and Rec Director Evaded Law in Handshake Deal
 - 7** School's Actions Suggest Bid-Splitting, Says IG
 - 7** IG: Marina Operations Weak on Controls, Recordkeeping
- 11** On the Road with IG Shapiro
- 13** Legislation Eyes 'Procurement Thresholds'
- 14** Should Your Municipality Appoint a CPO? Yes!
- 15** Chapter 30B Hot Topics



IG Shapiro, Communications Officer Carrie Kimball, Data Analytics Division

Director Alyssa Tasha, and Division of State Police Oversight Director Dave

Andrews attended the Association of Inspectors General Annual Training Conference from November 11 to 13 in San Diego.

Among the OIG's contributions, Kimball (left photo, center) co-hosted a Q&A session, Tasha (right photo) delivered a presentation on data analytics, and IG Shapiro participated on a panel of five inspectors general who discussed IG independence.

Protect Your Community

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



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Have a Question About
Chapter 30B?



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OIGProcurementSupport@mass.gov

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Recent Investigations and Case Updates

Nonprofit Founder Pleads Guilty to Stealing Thousands

In September, Monica Cannon-Grant, the founder and former CEO of nonprofit Violence in Boston, pleaded guilty in Boston federal court to charges that she fraudulently collected thousands of dollars from donors that she diverted for personal use. Additionally, Cannon-Grant admitted to making false statements to fraudulently collect thousands of dollars in pandemic relief aid and rental assistance.

Cannon-Grant founded Violence in Boston in 2017 with the stated purpose of reducing violence, raising social awareness, and aiding community causes in Greater Boston. From 2017 through 2021, Cannon-Grant, along with her late husband, applied for grants and solicited donations that they represented would be used for charitable purposes. The pair proceeded to use some of that money to pay for personal expenses, including the costs of hotels, car rentals, groceries, gas, and personal travel.

Cannon-Grant also concealed thousands of dollars in household income so that she would qualify for \$12,600 in rental assistance from Boston's Office of Housing Stability. Cannon-Grant and her co-conspirators further concealed earnings in applying for and receiving pandemic unemployment assistance from the Commonwealth.

U.S. District Court Judge Angel Kelley scheduled sentencing for January 29, 2026.

The guilty plea follows a joint-federal investigation involving the OIG, the U.S. Attorney's Office, the U.S. Postal Inspection Service, the U.S. Department of Labor's Office of the Inspector General, the Internal Revenue Service, and the U.S. Housing and Urban Development's Office of the Inspector General.

Guilty Plea to Pandemic-Related Fraud Charges

In October, a landlord with properties in Boston, Chelsea, and Revere pleaded guilty in Suffolk Superior Court to filing fraudulent applications for pandemic-era housing relief.

Steven Stoico filed seven rental assistance applications in 2021 in which he falsely claimed that tenants were living in certain units during specified periods of time. He backed up these claims with fabricated documents. Three of these fraudulent applications were approved, granting Stoico \$95,400 in pandemic relief. The remaining four, which would have totaled \$136,200 in pandemic relief funds, were denied.

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Stoico's co-defendant, Maria Grasso, also pleaded guilty to collaborating with Stoico to file two fraudulent rental assistance applications.

Stoico was sentenced to two and a half years in prison, suspended for five years. He was ordered to complete 250 hours of community service and pay \$95,400 in restitution. Grasso was sentenced to three years of probation and 150 hours of community service.



Former Parks and Rec Director Evaded Law in Handshake Deal

An OIG investigation found that a former director of the Hopkinton Parks and Recreation Department intentionally evaded procurement law in an unwritten handshake deal with a local food truck vendor to operate a town-owned concession stand. Parks and Recreation Director Jay Guelfi then violated state cash handling laws when he failed to turn over the cash generated from the concession stand to the town treasurer.

In a public letter to the Hopkinton town manager, the chair of the town's select board, and the chair of the Hopkinton Parks and Recreation Department, the OIG detailed how Guelfi made an agreement with the vendor in 2019 that allowed the vendor to operate the concession stand at a town athletic field.

The town ran afoul of the Commonwealth's public procurement law in not soliciting bids or issuing an RFP for the concession stand services. The OIG discovered evidence that the noncompliance was intentional, finding that both Guelfi and the vendor were aware of applicable law but sought to avoid the requirements.

Once vending operations began, Guelfi acted inconsistently with state law and the town's policies on cash handling. Between 2019 and 2021, Guelfi kept cash the vendor paid in the top drawer of his desk, without delivering it to the town treasurer as required by statute. Guelfi further violated the town's policies by using the cash to reimburse employees who made purchases for the department.

The OIG found that the department failed to implement basic internal controls to manage its relationship with the vendor, such as executing a formal written contract and requiring concession stand records to verify how much the vendor owed the town based on a percentage of sales.

The OIG recommended that the town take several actions to ensure that town departments adhere to procurement law and cash handling policies, such as memorializing all vendor agreements in writing and instituting multiple layers of review for managing cash proceeds. The OIG also recommended that the town adopt a formal policy reinforcing that state procurement law and municipal policies relating to procurements, written contracts, and cash handling apply to Hopkinton's commissions and boards.



"These defendants exploited a public benefit intended to help people remain in their homes during a global pandemic. Their actions are unconscionable and will not be tolerated. The pandemic may be over, but the Office of the Inspector General continues its efforts to hold accountable those who defraud or attempt to defraud public benefits."

-IG Jeffrey Shapiro

"Handshake deals and desk drawers full of cash are not only clear violations of state law and local policies, but are also an abuse of public resources. Those conducting the public's business must proceed fairly, openly, and in accordance with the law. Failure to do so erodes the public's confidence and significantly increases the likelihood of fraud, waste, and abuse."

-IG Jeffrey Shapiro

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"UCT knew or should have known that these construction projects were substantially related in time, location, and character. Accordingly, they should have been bid collectively."

-IG Jeffrey Shapiro

School's Actions Suggest Bid-Splitting, Says IG

An OIG investigation into a series of construction projects undertaken by Upper Cape Cod Regional Technical School (UCT) in Bourne found that the school likely split bids to evade procurement law and engage a preferred contractor. UCT further failed to document its procurement practices and execute written contracts with its vendors, the OIG found.

In a public letter to the chair of the Upper Cape Cod Regional Vocational-Technical School District Committee and the commissioner of the Massachusetts Department of Elementary and Secondary Education, Inspector General Shapiro described how UCT engaged Architectural Masonry Services, LLC (AMS) from 2020 to 2022 to construct retaining walls. UCT issued five separate invoices over five months to AMS, which individually were under \$10,000. Procuring the projects collectively would have required additional formalities, including soliciting quotes, meeting prevailing wage requirements, obtaining Occupational Safety and Health Administration (OSHA) training certification, and restricting the award to the lowest bidder.

Considering that the five invoices were issued within a five-month span and covered similar work to the same building, the OIG found that UCT likely engaged in "bid-splitting" to circumvent the more stringent procurement requirements.

The OIG also found that during the period examined UCT did not execute a written contract with AMS or other construction vendors.

The letter included recommendations directing the School Committee and UCT to (1) create a "culture of accountability" to adhere to applicable procurement laws and practices; (2) draft written policies for the procurement of supplies, services, and construction that are consistent with state and federal laws; and (3) draft enforceable contracts defining the scope of services to be provided by external vendors. 

IG: Marina Operations Weak on Controls, Recordkeeping

The OIG recently released findings resulting from its investigation of the operation and maintenance of the Pope's Island Marina in New Bedford.

In a [November 18 letter](#), the OIG presented its findings that the marina's lessor (the Massachusetts Department of Conservation and Recreation (DCR)) and the marina's lessee (the New Bedford Port Authority (NBPA)) mismanaged various aspects of marina operations over the course of 30 years.

Legislation passed in 1992 directed the NBPA to construct, develop, operate, and maintain Pope's Island Marina in downtown New Bedford and to pay an annual rent to

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DCR based on marina revenues. The OIG's investigation, covering the parties' performance under that directive from 1994 to 2024, found that DCR and the NBPA could provide only limited evidence of the annual rents the NBPA paid between 1994 and 2015. DCR could not produce records of slip fees that should have been used to calculate annual rents due. The OIG also found that DCR did not have controls in place to ensure that the NBPA paid the correct amounts in annual rents. Nor did DCR have a reconciliation process to account for missing or inaccurate payments.

Evidence revealed that the NBPA made numerous unauthorized deductions from rent payments for miscellaneous expenses, such as payments for natural gas and telephones. The OIG further found that the NBPA did not make marina repairs as required under the parties' agreements. Neither the NBPA nor DCR could account for \$190,000 that the NBPA deposited into an account earmarked for repairs. 

"The Pope's Island Marina and the revenue it generates are public resources, and the maintenance of the marina is critical to maintaining this important public resource. As such, it must be operated in a clear, transparent, and responsible manner."

-IG Jeffrey Shapiro

Sound Budget Practices, continued from front page

Establish a 'tone from the top.' Leaders should lead. Adopt best practices for budget management and clarify how staff members should adhere to policies already in place. Require a commitment up and down the chain of command to operate within the budget. Establish a culture that encourages individual and collective action to timely bring budgetary concerns to the attention of city and school leaders in a position to act.

Strengthen financial controls. Fiscal policies and practices should delineate the roles of individuals involved in preparing and administering the budget. Clear job descriptions hold personnel accountable for their responsibilities. Create fiscal policies or confirm that existing policies define reporting structures and circumstances under which financial staff members are required to elevate information impacting the budget. Include an alternative method of reporting should a concern go unaddressed. Find temporary ways to provide critical finance department resources in the event of vacancies.

Establish budgets based on realistic projections. Don't create a budget that is flawed from the start, with unreasonably optimistic projections related to matters such as student retention and tuition reimbursement. Monitor projections throughout the year to gauge whether they are holding true and to determine whether budgetary adjustments are necessary. Give heightened scrutiny to unpredictable expense lines such as out-of-district tuition and transportation costs.

Leverage available information. Use reports and other available information to monitor expenditures throughout the budgetary cycle.

Take timely action to address budgetary shortfalls. Ensure that the superintendent, school committee, and others in a position to act are aware of any anticipated budget challenges. Implement and strictly enforce measures proportionate to the problem. Don't miss the opportunity for early intervention. Take appropriate action, such as reducing staffing levels or placing a freeze on hiring, overtime, and discretionary spending.

Provide appropriate training. Ensure that those holding financial responsibilities – including school committee members – have the financial acumen to understand how to read and analyze budgetary documents. Encourage school committee members to complete the OIG Academy's training on the responsibilities of boards and commissions.

Establishing comprehensive policies, implementing internal controls, and ensuring adequate training will build transparency, foster public confidence, and provide a strong foundation to meet budget challenges head-on. 

One of the OIG's top priorities is to prepare Massachusetts municipalities to navigate the complex world of "public procurement" – using public funds to buy goods, engage services, and deliver them to city and town residents.

In 1997, the OIG founded the Massachusetts Certified Public Purchasing Official (MCPPO) program, which offers training and certification for professionals in the public procurement and contracting space. The MCPPO program is designed so that students who earn their certification leave the classroom with a well-rounded knowledge of how to make procurement decisions that are consistent with the law, considerate of public funds, and beneficial to users of public goods and services.

"As the maintenance superintendent for the Foxborough Fire Department, I handle most of our department's purchasing – from everyday supplies to larger facility and equipment projects. The MCPPO program has been one of the most valuable professional development experiences I've had in recent years. Before taking the courses, I knew the basics of procurement, but the program gave me a much deeper understanding of the legal framework,

ethics, and accountability that guide every purchasing decision."

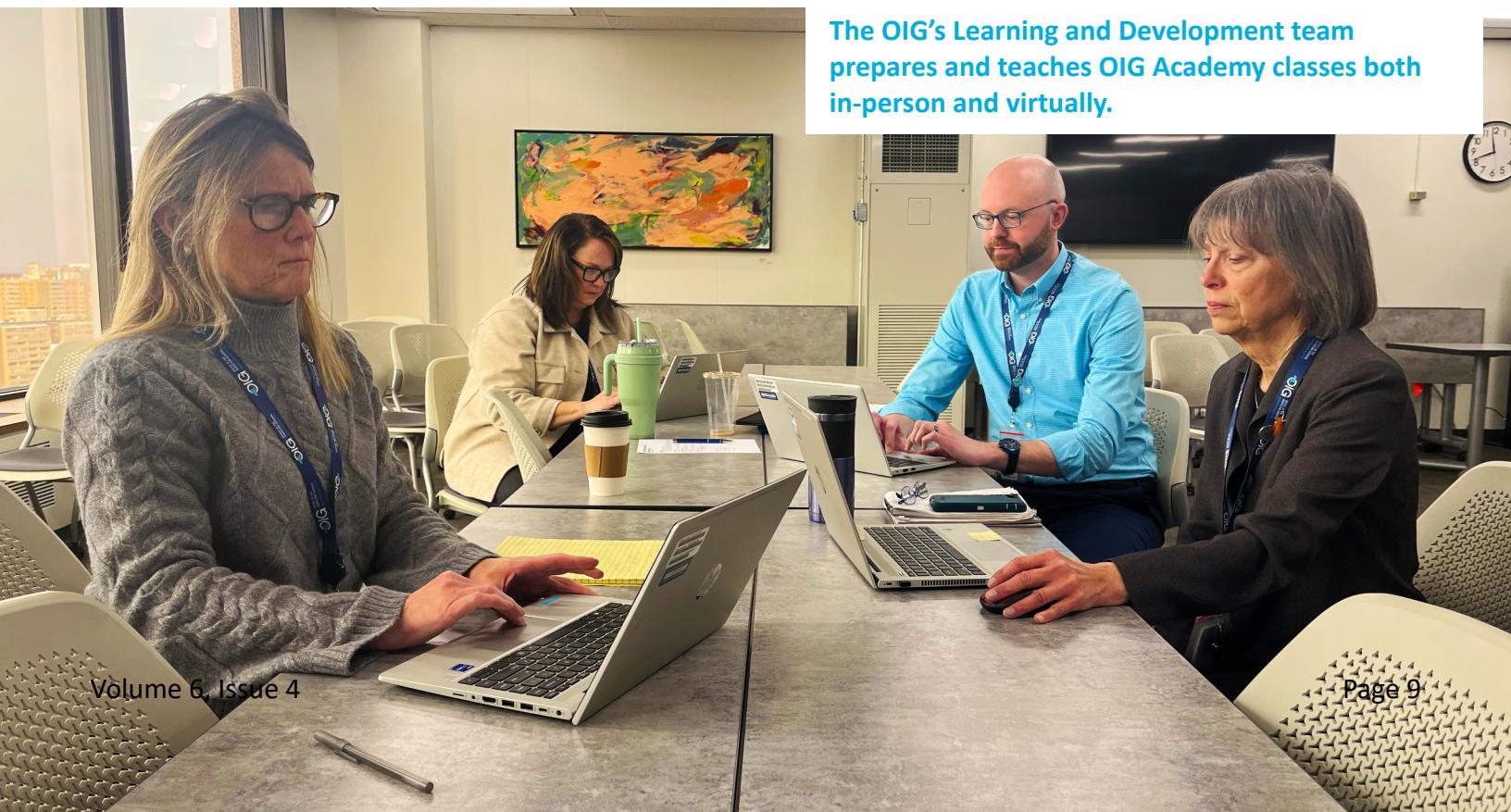
-Eion Bohnert, Superintendent, Foxborough Fire and Rescue Motor Squad Division

At the end of the program, a student can apply for the MCPPO Designation, which is widely recognized in Massachusetts as an indicator of expertise in public procurement law and best practices.

A student enrolled in the OIG Academy – the OIG's educational arm – must complete three courses before applying for their MCPPO Designation. *Public Contracting Overview* is a recommended prerequisite to the other courses and introduces students to the basics of Massachusetts procurement law, including a comprehensive overview of Chapter 30B of the Massachusetts General Laws (the Uniform Procurement Act) and key topics related to construction procurement. *Supplies and Services Contracting* delves more deeply into Chapter 30B and takes a close look at topics such as writing bid specifications, evaluating proposals, and administering contracts. *Design and Construction Contracting* covers practical strategies for procuring and administering design and construction contracts, exploring topics such as construction bidding and sub-bidding, legal issues in construction contracting, and prevailing wage laws. Each of these three courses includes

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The OIG's Learning and Development team prepares and teaches OIG Academy classes both in-person and virtually.



an exam which an enrollee must pass with a minimum score of 70% before being eligible for their designation.

“Completing the MCPPO certification has not only strengthened my professional skillset but also reaffirmed my commitment to continuous learning and professional growth. I highly recommend this program to anyone seeking to deepen their knowledge of Commonwealth laws, refine their approach to public projects, and make a meaningful impact on their organization and community.”

-Abdullah Khaliqi, Academic Principal, Fitzemeyer & Tocci Associates, Inc.

Since the program's founding, the OIG has trained and certified thousands of MCPPO designees, with 489 OIG Academy students earning or renewing their MCPPO Designations in 2025 alone. Among them have been municipal administrators and procurement officers in charge of making purchases for their cities and towns. Participants have also included other members of the public, such as employees of nonprofits and vendors who do business with the government.

Through its MCPPO Designation, the OIG continues to give procurement officials from the Commonwealth's largest cities and smallest towns the expertise to effectively navigate procurement laws that protect fair bidding processes and benefit the public.

To read more about the requirements for the MCPPO program and to access its application materials, visit the [OIG's website](#).

“It wasn't just theory. Everything I learned connected straight back to my current work: real rules, real practices, real impact. Now, when I make decisions, I know they're ethical, effective, and benefit the students and community I care so much about.”

-Randy Weiss, Operations Support, Taunton Public Schools 

The OIG Academy's Spring 2026 Schedule is now available in the *OIG Academy Course Catalog*.

It's not too late to register for the final offering of the Academy's Fall 2025 semester, the self-paced MCPPO Designation Renewal Course which opens on December 29.

To register for an upcoming class, visit the [OIG Academy Course Catalog](#) and make your selections. We look forward to seeing you in class!

What's New?

Changes to payment process

- Upon registration checkout, clicking the “Make Payment” button will redirect you to a payment portal. You will no longer receive a separate link to an outside payment vendor.
- You will only need to enter payment information. Other registration information will be automatically captured.
- You will receive a payment receipt by email.
- You will receive a separate email confirming enrollment.

Coming Soon!

Changes to MCPPO application and renewal process

The Academy is streamlining the MCPPO application and renewal process. When the new process is implemented, you will use the Academy's Learning Management System to submit your information. The system will verify your identification via DocuSign, with no need for a notary to certify forms.

Stay tuned!

On the Road with IG Shapiro

IG Shapiro's listening tour took him to 59 municipalities in 2025, from Pittsfield in the far west to Tisbury on Martha's Vineyard. These meetings have broadened IG Shapiro's perspective of challenges that face public officials throughout the state, and have opened lines of communication between the OIG and those on the ground who are working to effectively deliver goods and services to their cities and towns.

IG Shapiro's discourse with local leaders has resulted in initiatives such as the One Free Designee -- Schools Program. The program invites each of the Commonwealth's public school districts to designate one employee to take the core classes needed to earn the OIG's Massachusetts Certified Public Purchasing Official (MCPPO) Designation, all at no cost to the district.

Feedback from municipal leaders has also prompted IG Shapiro to recommend needed changes in the procurement law. For example, IG Shapiro championed legislation enacted in 2024 that streamlined the process for procuring electric vehicles and their charging infrastructure. Informed by his meetings with local officials, IG Shapiro has recently testified on bills that would make other commonsense changes to procurement law.

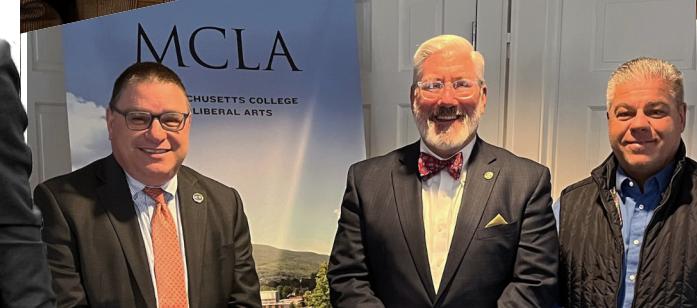
IG Shapiro with Williamstown Town Administrator Robert Menicocci and Fire Chief Jeffrey Dias.



IG Shapiro and Municipal Liaison Kristyn Taylor with Conway Town Administrator Veronique Blanchard.

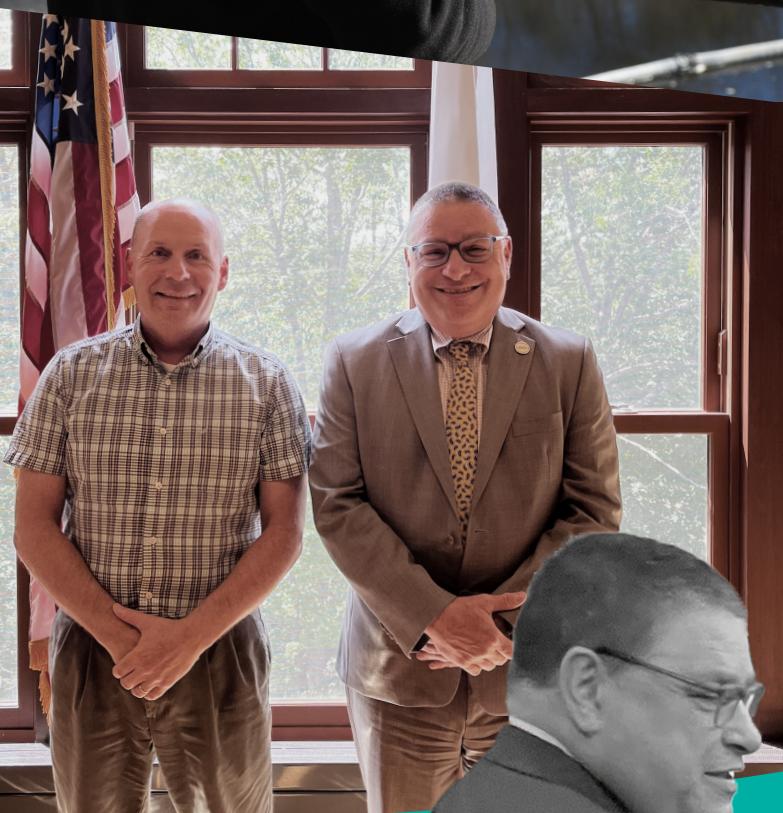
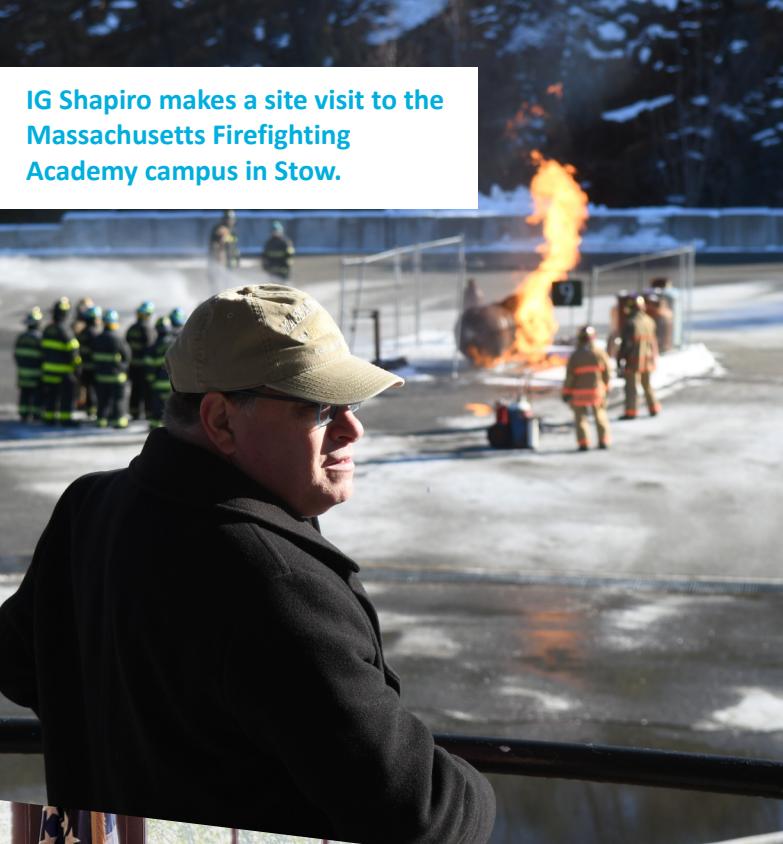


IG Shapiro with Tisbury Town Administrator Joseph LaCivita.



IG Shapiro with Massachusetts College of Liberal Arts President James Birge and Vice President of Administration & Finance Joseph DaSilva.

IG Shapiro makes a site visit to the Massachusetts Firefighting Academy campus in Stow.



In 2024, to remedy possible misconceptions that reaching out to the OIG for procurement support could trigger OIG audits or investigations, IG Shapiro restructured the OIG to more clearly distinguish its investigative and procurement support functions. IG Shapiro is working to eliminate any barriers that stand in the way of cities and towns getting the help they need in procuring goods and services.

In addition to assisting localities in procurement-related challenges, IG Shapiro and his municipal outreach team will continue to examine an array of issues facing localities, such as employee recruitment, employee retention, and the problems posed by “procurement deserts.” As IG Shapiro continues his listening tour in 2026, he is committed to learning more from the Commonwealth’s municipal leaders and using this insight to position the OIG as an even stronger force for good government.

Essex Eyes Fuel Management

As part of his statewide listening tour, IG Shapiro met on August 28 with **Essex Town Administrator Brendhan Zubricki** (pictured left), who reported that the town recently procured a fuel depot to manage municipal fuel inventories. When complete, the new facility will house a 4,000-gallon tank partitioned to hold both gasoline and diesel fuel. The depot will feature radio frequency identification (RFID) tags, with computer chips in the pumping station and vehicles allowing the town to better track the fuel usage of its fleet.

IG Shapiro at the Berkshire Municipal Leader Networking Event.

Legislation Eyes 'Procurement Thresholds'

On October 28, Inspector General Shapiro testified before the Joint Committee on Municipalities and Regional Government in support of House 56, *An Act Empowering Municipalities and Local Governments*. IG Shapiro spoke on House 56's "common sense" proposals to update the Commonwealth's Uniform Procurement Act, codified as Chapter 30B of the Massachusetts General Laws.

House 56, filed by Gov. Maura Healey, addresses three areas that IG Shapiro says would give municipal governments more flexibility in managing their day-to-day operations.

First, the bill would increase the maximum price threshold at which a municipal government can conduct procurements using "sound business practices." While House 56 by its terms would increase the current \$10,000 threshold to \$15,000, IG Shapiro recommended a further increase to \$25,000 to reflect current economic conditions.

Second, House 56 proposes raising the maximum threshold at which municipalities can procure supplies or services through written quotations from \$50,000 to \$100,000. In conjunction with the threshold described above for sound business practices, the passage of House 56 would mean that procurements for supplies and services with estimated values between \$25,000 and \$100,000 could be conducted through written quotations. This change to the threshold for written quotes would bring it in line with the threshold

already applicable to school districts. The bill would also allow, but not require, jurisdictions to use a sealed bids process for purchases under \$100,000.

Lastly, House 56 would add snow hauling and removal to Chapter 30B's current procurement exemption for snow plowing, making it easier for municipalities to procure snow plowing and snow removal services together.

"During my local statewide engagement meetings with municipal leaders I regularly ask where the pain points are, what is challenging, and what we can do to make their jobs a little easier while adhering to the principles of transparency, fairness, and good government. The provisions in this bill represent issues that have been consistently discussed with me at these meetings," said IG Shapiro.

The changes to the procurement law addressed in Chapter 56 are identical to the changes that IG Shapiro proposed in House 12 and House 13, which are also moving through the legislative process.

IG Shapiro reminded legislators that, while not necessarily flashy, these bills are supported by municipal leaders in the communities they represent. These changes would eliminate several procurement pain points which do make a difference in these communities. 



IG Shapiro looks over the city of Boston's snow removal machinery.



In December 2025, IG Shapiro made a site visit to get an inside glimpse of the city of Boston's snow removal operations. Pictured, from left, Deputy Superintendent of Basic City Services Stefanie Costa Leabo, Heavy Maintenance Lead Technician Sam Long, Director of Fleet Management Rob Pardo, IG Shapiro, Superintendent of Street Operations Daniel Nee, Budget Director and Interim Director of Code Enforcement Mohammed Uddin, Superintendent of Basic City Services Mike Brohel, Interim Chief of Streets Nick Gove, and Director of Administration & Finance of the Streets Cabinet Omar Khoshafa.

Should Your Municipality Appoint a CPO? Yes!

What keeps you up at night? Procurements? Appoint and support a qualified Chief Procurement Officer (CPO) to oversee procurements for your municipality.

A CPO brings knowledge and expertise to your procurement processes. They ensure that your jurisdiction complies with procurement laws and best practices and has the policies and procedures in place necessary for effective, accurate procurements. A CPO helps you avoid costly errors, omissions, or worse.

If you have a purchasing department – and most Massachusetts cities and larger towns do – your Purchasing Agent is your CPO. Otherwise, your appointing authority (your mayor, town manager, select board chair, etc.) may appoint someone to the position. In many jurisdictions, the CPO holds other titles, such as director of finance or business manager, and has the related responsibilities.

Your CPO oversees solicitations, reviews bids and proposals, evaluates quotes, appoints evaluation committee members, and awards contracts. This can be a lot of work depending on the size of your jurisdiction, so your CPO may delegate purchasing authority to one or more other municipal positions. The delegation may be specific or general and may be limited to a particular procurement or class of procurements.

A delegation may be conditional upon compliance with specified procedures. The CPO has the right to amend or revoke a delegation if they determine it is in the best interests of the governmental body. The CPO must file the delegation with the Office of the Inspector General for it to take effect. Use the [OIG's online CPO Registration Form](#) to file the delegation.

The OIG is currently updating its list of CPOs and CPO delegations for the Commonwealth's 351 municipalities and for its regional school districts, fire districts, water districts, and related public entities. From time to time, the OIG will communicate with the local officials who hold this important appointment about learning opportunities, changes in the law, and best practices. And it will help you sleep at night! 

CPOs: Register with the OIG

Use the OIG's convenient [online CPO Registration Form](#) to complete your municipality's CPO registration and CPO delegation. Please complete your registration by January 31, 2026.

2. Definitions.
3. Procurement contracts; files.
4. Submission of quotations.
5. Competitive sealed bidding procedures.
6. Competitive sealed proposals; requests for proposals; additional evaluation criteria.
- 6A. Utilization of reverse auctions for the acquisition of supplies and services.
7. Sole source procurements.
8. Emergency procurements.
9. Cancellation of invitation for bids; rejection of bids or proposals.

Chapter 30B

Hot Topics

Reminder: Bid-Splitting is Illegal

Bid-splitting isn't about splitting hairs. It is about intentional conduct to avoid procurement laws.

What is bid-splitting, and how can you make sure your jurisdiction doesn't do it?

Simply put, bid-splitting consists of illegal actions to divide a procurement – whether an invitation for bids, request for proposals, or solicitation for quotes – to avoid the threshold requirements of the Commonwealth's procurement laws.

What does bid-splitting look like? Consider a jurisdiction that needs to purchase 50 tables at \$300 each, for a total estimated cost of \$15,000. An illegal "split" would separate the order into two or more contracts, each valued at less than the \$10,000 threshold that triggers the requirement for a jurisdiction to solicit three written quotes from qualified vendors. In splitting the purchase into smaller amounts, the jurisdiction would theoretically procure the tables under the law's less rigorous "sound business practices" standard.

Making multiple smaller purchases of similar goods or services in a short period of time can be an indication that a jurisdiction is splitting its procurement to avoid a higher threshold and the stricter statutory requirements that come with it. For example, a recent OIG investigation involving a school's procurement of construction-related services found that the school likely engaged in bid splitting. The school completed multiple retaining wall construction projects from May to September 2022. Although the costs totaled \$37,200, the school issued five separate invoices to the vendor, each for less than \$10,000. The invoices covered similar work to the same building, strongly suggesting that the school deliberately split the construction project into smaller procurements to fall under the \$10,000 threshold. The OIG concluded that school knew or should have known that the construction projects were substantially related in time, location, and character, and accordingly should have been procured collectively.

Similarly, any attempt to stay below the \$50,000 threshold for a competitive sealed bidding process (\$100,000 for local school or regional school districts) to save time or to solicit quotes from a favored vendor is also clearly prohibited.

Public Procurement Technical Support Team

Telephone: 617-722-8838

Email: OIGProcurementSupport@mass.gov

[Online Form](#)

Contact the Massachusetts Office of the Inspector General



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(617) 727-9140

Fraud Hotline
(800) 322-1323

MassDOT Fraud Hotline
(855) 963-2580

Public Procurement Technical Support
(617) 722-8838

OIG Academy
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Media Inquiries
(617) 722-8894

By Email

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