



OIG BULLETIN

Official Newsletter of the Office of the Inspector General



Photograph by Anna Lockett, 2023

Good day:

October 3 marked my second anniversary as Inspector General. I hope that my proactive and collaborative approach to the work of this office is apparent by now. Perhaps the event that best illustrates how I view my role is the open house that the Leyden Fire Department held on a Saturday in August to celebrate the town's purchase of two fire vehicles, one new and another used.

This event is not typical of those I have attended. But after the town received no responses to its request for bids for a fire truck, Senator Jo Comerford reached out to the Office of the Inspector General (OIG) for guidance on how to proceed. I was committed to (1) helping the

community comply with the procurement law; (2) finding the equipment they needed at a price they could pay; and (3) addressing an immediate emergency situation due to an inadequate number of operating emergency response vehicles. I have spent my entire career working in public service. I know firsthand that all too often bureaucracy or inertia can get in the way of common sense. The August open house marked our collaborative success in procuring the needed vehicles.

People might assume that the OIG's work focuses exclusively on allegations of government fraud. But while fraud investigations are a critical part of our mission, they comprise only a part of what we do.

Just as important to me, but less understood, is our role in education, training, prevention, and assistance. I am committed to making the OIG an instigator, partner, adviser, and leader in making government work better today than it did yesterday.

Significantly, I restructured the OIG to place greater emphasis on prevention, education, and training. I feel strongly that promoting best practices in the use and protection of public assets is critical to our mission of preventing and detecting fraud, waste, and abuse of public resources. In that vein, I have challenged our OIG Academy to offer more education and training opportunities that incorporate an understanding of real world complications or headwinds. While it is critical to understand the rules of the road, so to speak, we need to listen to you about the challenges you face when implementing these practices. Our new Learning & Development Director, Karla Koza, is making important changes to our courses and curriculum. Read more about her efforts in the article on [page 9](#).

Another cornerstone of my administration is my ongoing "listening tour" that gets me out of the office and into city and town halls, county commissioner offices, regional planning

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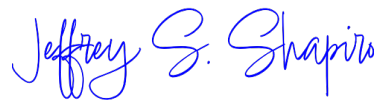
Letter from the Inspector General, continued

agencies, airports, water treatment plants, veterans' housing, and other places where public servants are making government run.

My most recent visits included tours of Logan International Airport, Martha's Vineyard Airport, and the MWRA Deer Island Water Treatment Facility in Winthrop. I also recently met with the six Martha's Vineyard town administrators and with Worcester's city manager. These meetings leave me energized and optimistic, and give me many of my best ideas on how to make government work better for all of us.

As always, I am honored to serve as your Inspector General.

Best,



Jeffrey S. Shapiro, Esq., CIG
Inspector General



Perhaps the event that best illustrates how I view my role is the open house that the Leyden Fire Department held in August to celebrate the town's purchase of two fire vehicles, one new and another used.

Pictured from left to right: Inspector General Jeffrey Shapiro, Leyden Select Board Chair Katherine DiMatteo, Senator Jo Comerford, and Leyden Fire Chief Carey Barton

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Protect Your Community

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Recent OIG Investigations and Case Updates

Former Early Education and Care Commissioner Steers \$2.1 Million Consulting Contract to a Favored Firm



In an August 14, 2024 letter to Education Secretary Patrick Tutwiler, Inspector General Jeffrey S. Shapiro shared findings of an OIG investigation into the Department of Early Education and Care's (EEC) procurement of consulting services. The investigation found that a former EEC commissioner conducted an unfair and noncompetitive procurement when hiring an educational consulting firm that was ultimately paid over \$2.1 million for "strategic planning services."

The investigation was initiated in response to a hotline complaint which alleged that former EEC commissioner Samantha Aigner-Treworgy steered the procurement for consulting services in favor of a consulting firm with whom Aigner-Treworgy worked in her previous role as chief of early learning for the city of Chicago.

The OIG determined that EEC's procurement of the strategic planning services contract with the consulting firm violated 801 CMR 21.06, a Massachusetts regulation on competitive procurement standards, in

multiple capacities. The OIG concluded that Aigner-Treworgy conducted the procurement process with the clear preconceived intent of selecting the consulting firm as the vendor. Witnesses involved in the procurement process stated that the commissioner had a "clear vision" as to which vendor she planned to award the contract. The OIG's findings support the allegations that the selection was predetermined.

The OIG found that EEC:

- Did not advertise its RFP for strategic planning services for a commercially reasonable period;
- Engaged in exclusive communications with the favored firm outside of the formal RFP process; and
- Did not ensure that EEC employees involved in procuring the services had training or experience in conducting procurements.

"Procurement rules exist to ensure that state contracts are awarded fairly and that all qualified vendors have a fair chance to bid. In this instance, EEC's process for procuring strategic planning services through a request for proposals (RFP) was not competitive and there was clear favoritism."

-Inspector General Shapiro

The OIG recommended that the Executive Office of Education (EOE) comply with Executive Order 533, which directs its executive branch departments and agencies to appoint a chief procurement officer and see that those officers receive appropriate training. The OIG further recommended

Continued on next page

Recent OIG Investigations and Case Updates, continued

that EOE establish department procurement policies that establish minimum response times for RFPs to allow for thoughtful and competitive responses from vendors.

"We are pleased to learn that the Secretary and his leadership team have since implemented changes to the procurement policies and procedures at EOE. We look forward to working with them to understand these changes and to ensure that proper procurement procedures are in place and that a procurement officer has been designated and properly trained," IG Shapiro said.

Former Blackstone Council on Aging Director Had Improper Fiscal Relationship with Related Nonprofit

The OIG has concluded its investigation into a former Blackstone town employee's use of funds from a nonprofit organization affiliated with the town. In an August 19, 2024 letter to the Blackstone town administrator, the OIG shared the findings of the investigation and urged the town of Blackstone to adopt policies to increase oversight and strengthen internal control measures to prevent misspending.

The investigation stemmed from a call to the OIG's Fraud Hotline alleging that the former director of the Blackstone Council on Aging (COA) made suspicious use of funds raised by the Friends of the Blackstone Council on Aging (FBCoA), a 501(c)(3) organization that supports the COA.

The OIG found poor fiscal recordkeeping at the FBCoA, with no invoices or bank statements, during the former COA director's tenure from 2012 to 2021. Without supporting documentation, the OIG had difficulty verifying that purchases and withdrawals made from the FBCoA account were for an express FBCoA purpose, or even for a COA purpose. ATM withdrawals at the Twin River Casino and multiple purchases from Amazon and CVS were among the suspicious transactions.

The OIG's review of bank account statements showed \$12,501.40 in the FBCoA account on August 31, 2016. On December 31, 2018, the account's remaining balance was \$787.16.

The OIG recommended that the town:

- Maintain a list of all town-affiliated nonprofits and their officers;
- Prohibit town employees from serving as fiscal officers for nonprofits associated with their department or agency; and
- Require town departments to keep detailed records of their financial transactions by retaining invoices, receipts, and other financial records.

Similarly, the OIG recommended that town-affiliated nonprofits:

- Designate more than one officer to have access to bank accounts;
- Disclose the identities of their officers and board members to the town; and
- Keep detailed records of their financial transactions by retaining invoices, receipts, and other financial records.

"These controls will promote fiscal accountability for both municipalities and nonprofits, helping to ensure that their respective funds are managed in a financially sound manner consistent with their intended use. These basic internal controls and recordkeeping requirements are the foundation of good government, provide a mechanism by which town officials can be held accountable, and give a level of assurance to nonprofit donors that their donations are being used for their intended purpose and not for improper personal gain."

-Inspector General Shapiro

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Recent OIG Investigations and Case Updates, continued

OIG Reaches Agreement with Office Supply Retailer W.B. Mason to Refund Agency Overpayments



In August, the OIG announced an agreement with office supply retailer W.B. Mason to refund nearly \$300,000 to state and local agencies that purchased office supplies through a state contract at incorrect prices.

The OIG initiated an investigation after receiving a complaint that W.B. Mason customers, using a pre-negotiated state contract, were charged more than the agreed-upon prices or applicable discounts. The OIG found that customers were inadvertently overcharged \$284,157.29 over a five-year period.

"It is important to note that this agreement was reached voluntarily and represents less than one percent of the total sales for the duration of the contract. That said, public dollars are precious, and it is critical that companies who do business with the state comply with contractual terms and conditions."

-Inspector General Shapiro

Per the agreement, W.B. Mason refunded a portion of the total directly to the Commonwealth's General Fund to cover the overages paid by state agencies and paid a

portion to the OIG to offset its investigative costs. Municipalities and other entities that were overcharged by \$50 or more have or will receive credits toward future purchases. Unused credits may revert to cash refunds.

International Fraud Awareness Week



November 17–23, 2024

The Office of the Inspector General is supporting International Fraud Awareness Week, an annual global effort to minimize the impact of fraud by promoting anti-fraud awareness and education.

According to the Association of Certified Fraud Examiners, organizations that provided fraud training for employees saw a 38% reduction in the median loss per instance of fraud. As the agency mandated to prevent and detect fraud, waste, and abuse of public resources in the Commonwealth, the OIG invites you to participate in this educational effort.

The OIG has created a toolkit of resources that you can use to help raise awareness of what fraud is, how to prevent it, and how to report it if you suspect someone in your organization is committing fraud.

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International Fraud Awareness Week, continued

You can download our new flyer – [“Recognize and Report Workplace Fraud”](#) – and post it in employee break rooms, near the copy machine, or anywhere employees gather.

The OIG also has several videos available

that explain what fraud is, how our Fraud Hotline works, and protections for whistleblowers who report fraud.

We encourage you to review and share these resources within your organization, with your vendors, and with the public that you serve.

The Star Store Report: State-Funded Lease Wasted Public Funds



In September, the OIG issued [The Star Store 20-Year Lease – A Lack of Shared Vision and Collective Accountability Wastes Millions in Public Dollars](#), an investigative report that details how the Commonwealth came to procure a 20-year lease of an iconic building in downtown New Bedford and walked away 22 years and \$60 million later without exercising a \$1.00 purchase option.

“From its inception, it was a sham procurement,” Inspector General Jeffrey S. Shapiro said. “The request for proposals contained detailed requirements that effectively narrowed down potential respondents to one – the Star Store.”

“Former Inspector General Robert Cerasoli urged then-Governor Weld to veto the legislation authorizing the procurement because it unnecessarily exempted it from existing statutory safeguards and was written so narrowly that there was no competition,” IG Shapiro continued. “He correctly observed that the lack of competition would subject the Commonwealth to excess costs and reduce any incentive for the landlord to operate efficiently.”

“Indeed, the resulting lease was flawed and unusually advantageous to the owner. In addition to the base rent, the Commonwealth paid for all operating expenses and property taxes. In short, the owner had virtually no out-of-pocket expenses and made millions in profit over the 22 years of occupancy,” IG Shapiro said.

In February 2000, the Legislature directed the Division of Capital Asset Management and Maintenance (DCAMM) to procure and execute a 20-year lease agreement to rent the Star Store to benefit the University of Massachusetts at Dartmouth (UMD). The lease included an option to purchase the building for \$1.00 at the end of the 20 years. When the lease expired in 2021, rather than exercising the option to purchase or vacating the building, the parties entered a one-year lease followed by a year-long month-to-month tenancy. That ended when the Legislature stopped funding the rent payments and the Commonwealth failed to timely exercise the \$1.00 purchase option. This forced UMD’s College of Visual and Performing Arts to hastily vacate the Star Store after operating for over two decades in the building.

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The Star Store Report, continued

The OIG found that there was no shared understanding among the involved parties – the Legislature, UMD, DCAMM, and the property owner – as to who was responsible for various aspects of the lease. As a result, funds designated for capital improvements and maintenance were never used and the building was not properly maintained, making the Commonwealth’s option to purchase less attractive. The parties also collectively failed to communicate and plan for the end of the lease. Consequently, UMD continued its tenancy for an additional two years, wasting nearly \$4 million in public funds through the short-term and month-to-month tenancies.

“The collective failure to make a decision either to purchase the building or plan to vacate the building as the end of the lease was approaching was fiscally irresponsible and wasteful,” IG Shapiro said.

The report offers specific recommendations to each party in hopes of preventing a similar waste of public funds and assets in the future. “While this was a very unusual project, it is my hope that the recommendations provide useful guidance to all parties going forward,” IG Shapiro said.

The report was prepared pursuant to Section 79 of Chapter 28 of the Acts of 2023, which required the OIG to review the costs associated with UMD’s use of the Star Store to house its Center for Visual and Performing Arts during the short-term and month-to-month tenancies from September 7, 2021, to August 31, 2023. In light of former IG Cerasoli’s concerns, the OIG expanded its review to include the original 20-year lease and the entire period of UMD’s occupancy.



Meet Karla Koza

Director of Learning & Development



In the two years since Jeff Shapiro was sworn in as Inspector General, the OIG's education and training programs have undergone significant changes. The renaming of the OIG's educational arm from the MCPPO program to the OIG Academy signified IG Shapiro's commitment to broaden educational and training opportunities and to make them more accessible.

Enter Karla Koza, a former public school administrator with extensive experience with aligning curriculum and designing professional development programs with specific goals around creating inclusive and dynamic learning opportunities.

"My background as a public school administrator showed me the importance of meaningful professional development. It has to be interesting, relevant, engaging, and immediately useful."

-Karla Koza, Director of Learning & Development

At IG Shapiro's direction, Koza is reimagining how the OIG delivers education and training. Koza and her team are reviewing the OIG Academy curriculum to ensure that courses are relevant and offer the most up-to-date information possible. Given that the subject matter of most OIG Academy courses can be dense and complex, Koza is moving to a more student-centered approach that leans on best practices for instructional design (see sidebar on next page).

To provide Academy students with more personalized learning opportunities, live classes will be capped at 50 students. The Learning & Development team will focus on strategies that increase student engagement and connection, like having cameras on, forming breakout groups that are strategically designed to maximize the experience level of students, and using "live knowledge check polls" to keep tabs on learning effectiveness.

By creating these more authentic connection points, Koza hopes to support job-alike networking among OIG Academy students.

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Meet Karla Koza, continued

A Revamped 'Public Contracting Overview' Course

The OIG Academy team is using a curriculum review cycle to continuously examine the content of courses to maintain their relevancy. The "Public Contracting Overview" course was the first to undergo an evaluation. Koza's team reviewed the learning objectives while contemplating the knowledge and skills that students need. The course content, learning activities, and assessments were analyzed, and any aspect of the course not related to a course objective was eliminated. One outcome of the review was that the course was shortened from three days to two.

"Reviewing curriculum on an ongoing basis ensures that the content is targeted to students' needs," said Karla Koza, Director of Learning & Development. "Removing content from a course curriculum doesn't necessarily mean it was not valuable. It may not have been relevant to course goals and may belong in another Academy offering."

"Connecting with others in your field is a key benefit of professional development. If our learners can build their resource toolbox through networking, we are ultimately building a more informed constituency," Koza said. "We must be more intentional about creating that space with our classes."

In-person and regional training opportunities are on the horizon. For now, look for smaller and more engaging courses.



One Free Designee Update

The pilot "One Free Designee" program has been a great success, with 180 municipalities participating to date. Thirty-four of those municipalities never had an employee with an MCPPO Designation or had employees whose Designation had lapsed.

When announcing the program, IG Shapiro said, "The MCPPO Designation signifies an understanding of Massachusetts procurement laws, and that alone can help reduce fraud, waste, and abuse. I have heard from municipal officials that the cost of the required classes for the MCPPO Designation, at nearly \$2,000, is a barrier to some communities."

"I am very thankful for the opportunity to participate in the training offered by the OIG. Coming from a smaller town that is quite remote, it was a gift to be able to take advantage of the One Free Designee program without the burden of off-island travel or added expenses to the taxpayers."

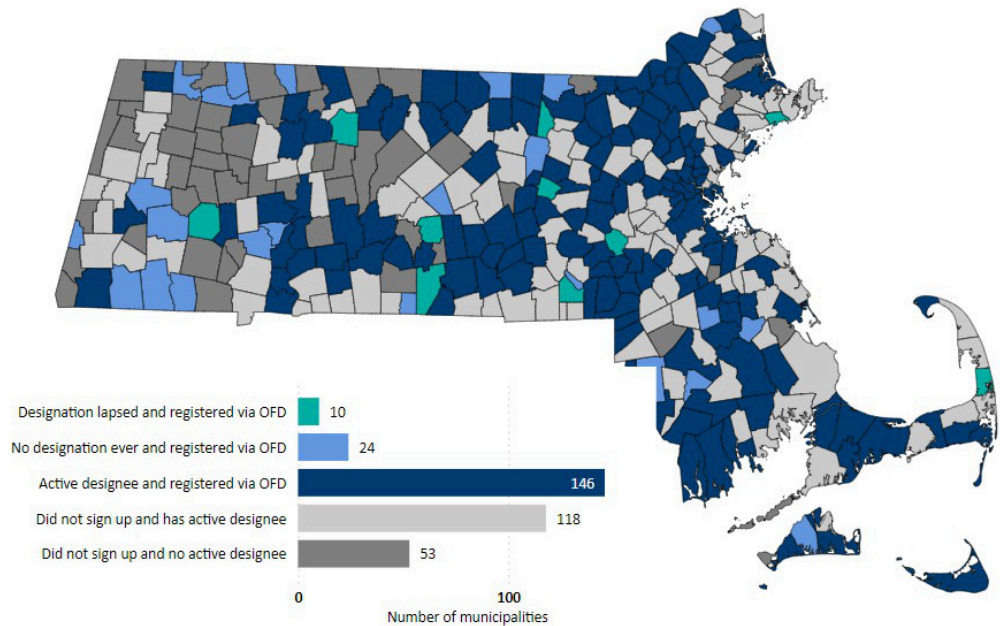
**-Jennifer Rand,
West Tisbury Town Administrator**

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One Free Designee Update, continued

The program remains open to municipalities that have not yet signed up. All course-work must be completed by the end of the fiscal year (June 30, 2025).

To apply for the program, please fill out and submit the [One Free Designee Application Form](#).



"I took the first class many years ago but was never able to complete the program due to the expense as well as the time out of the office. This program was offered online, which made it much more accessible to small towns where everyone wears many hats and can't find the time to be out of the office.

Now that I have completed the program and earned the MCPPO Designation, I feel confident that the town will be able to adhere to the state procurement requirements."

**-Carol A. McLeod, CMMT, MCPPO,
Merrimac Town Administrator,
Finance Director, Treasurer**

We Want Your Feedback!

Which *OIG Bulletin* features do you find most valuable? Are there additional topics we should cover? Some regular features include:

- Letter from the Inspector General
- Recent OIG Investigations and Case Updates
- Frequently Asked Questions
- Informational Articles on Recent OIG Reports
- Timely Procurement Topics (for example, purchasing agricultural products or snow-related equipment)
- Federal Pandemic Relief Grant Information
- OIG Academy Class Updates

Please email carrie.c.kimball@mass.gov with comments OR complete [this short survey](#).



OIG Academy Registration Processes Are Changing!

For the Spring 2025 semester, OIG Academy learners will be using an improved automated system to register and pay for courses. Here's what you can expect:

Registration Process Changes

- The OIG Academy website will look different. Our course catalog will be more appealing and easier to navigate.
- Users can review course descriptions and register directly from a course description.
- Once registered for a course, learners will be directed to a new version of the **Blackboard Learn** learning management system. All login information will be provided to students automatically upon registration.
- Students will be able to better understand OIG Academy learning pathways to the MCPPO Designation and renewal and the MSBA certification and recertification.

Payment Changes

- Student payment processes will be completed online via the new learning management system.
- All **online** payment options **will be available**: Credit/Debit/P-Card/E-Check/ACH.
- The OIG Academy **will no longer accept paper checks** or **registration via IE/ITA**.
- Payments for more than one student from an organization or entity may no longer be completed together. Each student must be registered and paid for separately.

Thank you for your patience while we transition to this new system. Please contact us with any questions you may have at ma-igo-training@mass.gov.

OIG Office Reorganization Complete

IG Shapiro Rounds Out Leadership Team

Over the summer, IG Shapiro filled two key staff positions, tapping **Eugenia M. “Genie” Carris** as the OIG’s general counsel and naming **James J. McNeill Jr.** as director of the Veterans’ Services Oversight Division.

Carris served in various positions in the U.S. Attorney’s Office for 22 years, most recently as the deputy chief of the Public Corruption and Special Prosecutions Unit. A graduate of Harvard College, Carris earned her J.D. from Boston College Law School, where she is an adjunct professor.

As general counsel, Carris leads the OIG’s Legal & Compliance Bureau, made up of the Office of the General Counsel; the Audit, Oversight and Investigations Division; and the Government Outreach and Public Policy Division.



McNeill, a retired Chief Master Sergeant (USAF) with 33 years of military service, oversees services that the Commonwealth and its municipalities provide to veterans.

McNeill is a Distinguished Graduate of the Noncommissioned Officer Academy at McGhee Tyson Air National Guard Base in Tennessee. He is also a graduate of Lesley University and earned a master’s degree in business administration from Grantham University.

With Carris and McNeill on board, IG Shapiro’s reorganization of the OIG is complete. Earlier this year, IG Shapiro restructured the office into [three bureaus](#) – Operations, Publications & Training; Specialty & General Government; and Legal & Compliance. The bureaus are led by Chief Operating Officer Katie Verma, Deputy Inspector General Susanne O’Neil, and General Counsel Genie Carris, respectively.

“I am grateful to have these talented and committed professionals on the OIG leadership team. Together we are fortunate to lead a group of people who are devoted to detecting and preventing waste, fraud, and abuse of public resources, thereby making government work better today than it did yesterday,” Shapiro said.



Contact and Subscription Information



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Chapter 30B Assistance Hotline
30BHotline@mass.gov

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

Attorney General's Office

For questions related to public construction, public works, or designer selection, please contact the AGO at (617) 963-2371.

Class Information

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

- [Class schedule](#)
- [Class registration](#)

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