



OFFICE OF THE  
INSPECTOR GENERAL  
MASSACHUSETTS

2024

# Annual Report



April 30, 2025

Jeffrey S. Shapiro, Esq., CIG  
Inspector General  
Office of the Inspector General  
Commonwealth of Massachusetts

April 30, 2025

Via Electronic MailHer Excellency Maura Healey  
Governor of MassachusettsThe Hon. Andrea Joy Campbell  
Attorney GeneralThe Hon. Diana DiZoglio  
State AuditorThe Hon. Karen E. Spilka  
President of the SenateThe Hon. Ronald Mariano  
Speaker of the HouseThe Hon. Kimberley Driscoll  
Lt. Governor of MassachusettsMatthew Gorzkowicz, Secretary  
Exec. Office of Admin. and FinanceThe Hon. Michael J. Rodrigues, Chair  
Senate Committee on Ways and MeansThe Hon. Aaron M. Michlewitz, Chair  
House Committee on Ways and MeansThe Hon. Mark C. Montigny, Chair  
Senate Post Audit and OversightThe Hon. John J. Mahoney, Chair  
House Post Audit and OversightThe Hon. Bruce E. Tarr  
Senate Minority LeaderThe Hon. Bradley H. Jones Jr.  
House Minority LeaderThe Hon. Patrick M. O'Connor  
Ranking Member  
Senate Committee on Ways and MeansThe Hon. Todd Smola  
Ranking Member  
House Committee on Ways and MeansThe Hon. Ryan C. Fattman  
Ranking Member  
Senate Post Audit and OversightThe Hon. Marcus Vaughn  
Ranking Member  
House Post Audit and Oversight**Re: Office of the Inspector General's 2024 Annual Report**

Dear Governor Healey and Commonwealth Leaders:

As the Commonwealth's Inspector General, I take great pride in presenting the Office of the Inspector General's (OIG) 2024 Annual Report.

The accompanying report, prepared pursuant to the statutory requirement of Section 12 of Chapter 12A of the Massachusetts General Laws, highlights the work completed in Calendar Year 2024 by the nearly 90 professional staff members of the OIG. I am humbled to lead this group of dedicated public servants who embody the ideals that the Ward Commission envisioned when it recommended, several decades ago, that the Massachusetts Legislature create such an independent government oversight entity. The OIG has grown and evolved significantly since its establishment in 1980 and remains a leader and example for the rest of the country.

This year, my second full year as Inspector General, I had the opportunity to lend support for the concept of an office of the inspector general in other jurisdictions. In May 2024, I testified separately before the Rhode Island House Committee on Finance and the Boston City Council's

Committee on Government Operations in support of the creation of an OIG. While I did not speak to their respective specific proposals, I was emphatic that a true inspector general's office must have a clear mandate, independence, the ability to conduct confidential investigations without fear or favor, and whistleblower protection.

We are fortunate in Massachusetts to have a strong foundation on which the Office of the Inspector General rests. The Legislature, following the recommendation of the Ward Commission, wisely crafted the OIG's enabling statute. It outlines clear qualifications, authority and powers for the office and ensures its independence with nonconcurrent terms between the appointers and the appointee. The statute also requires an appointer to show cause to remove an inspector general.

We are also fortunate that the Commonwealth's leadership continues to support the importance of the OIG through appropriate funding to carry out its mission. Sufficient funding is simply necessary to be impactful. I have been privileged to have received budgetary support from the Administration and the Legislature to modernize and revolutionize the Massachusetts OIG, which are key tools to enable the OIG to execute its statutory mission.

This funding has made it possible to produce meaningful results. When my tenure began, I prioritized technology upgrades to ensure the OIG had the tools to perform its best work. To that end, over the past two and a half years, we have made significant investments in IT to ensure our work is housed in the most appropriate environments to meet our data security obligations and that our systems can support the advanced data work that we do. Additionally, we upgraded our Learning Management System to transform and streamline the overall student experience for our adult learners, who are often managing full-time workloads along with attending OIG trainings and earning OIG certificates. Our new LMS provides a time savings for the over 2,000 municipal and state employees, business partners, and members of the public who take OIG Academy courses. Perhaps just as important, the LMS provides an engaging, user-friendly experience that enhances learning.

Finally, I am proud that after much collaboration the OIG has updated its organizational mission and vision statements to better encompass the full breadth of the OIG's statutory responsibilities. The objectives and aspirations inherent in our new mission and vision statements are reflected throughout the pages of this report and are built upon the principles of engagement, education, and investigation. Notably, building cases is not the only way for the OIG to approach its work considering that in the Commonwealth there are around 300,000 public employees who spend approximately \$120 billion annually. It therefore makes sense that some of our work involves assisting public stakeholders through educational and outreach efforts.

I have assembled an exceptional team of attorneys, directors, managers, investigators, analysts, communicators, instructors, data scientists, IT professionals, operations, and administrative specialists who do this work because of their commitment and dedication to our mission. Together, they answer the call every day to strive to make government work better tomorrow than it did today on behalf of the people of the Commonwealth.

As you review this report, you will come to understand the positive return on investment that a statewide inspector general's office provides through its work.

Sincerely,



Jeffrey S. Shapiro, Esq., CIG  
Inspector General

cc (via email):

Michael D. Hurley, Senate Clerk  
Timothy Carroll, House Clerk  
Stacy DeBole, State Librarian, State Library of Massachusetts  
Susanne M. O'Neil, Deputy Inspector General, OIG  
Eugenia M. Carris, General Counsel, OIG  
Nataliya Urciuoli, Senior Executive Assistant, OIG

# Inspector General Council

**Susan Terrey, Chair (elected) – By designation of Secretary of Public Safety and Security**

**Michael Leung-Tat, Vice Chair (elected) – By designation of State Auditor**

**Jennifer Cotter – By designation of Attorney General**

**Comptroller William McNamara – By statute**

**Michael Caira – By Governor's appointment**

**Dale Hamel, Ph.D. – By State Auditor's appointment**

**James Morris – By Attorney General's appointment**

**Christopher Walsh – By Governor's appointment**

# Office of the Inspector General's Leadership

**Jeffrey S. Shapiro, Inspector General**

**Susanne M. O'Neil, Deputy Inspector General**

**Eugenia M. Carris, General Counsel**

**Katie Verma, Chief Operating Officer**

**Sarah Hoover, Human Resources Director**

**Marcelle Payen, Chief Fiscal Officer**

**David Andrews, Director of Division of State Police Oversight**

**Neil Cohen, Public Procurement and General Government Oversight Director**

**Julie Flaherty, Bureau of Program Integrity Director**

**Josh Giles, Director of Government Outreach and Public Policy Division**

**Karla Koza, Learning and Development Director**

**Gregory Matthews, Healthcare Division Director**

**James McNeill, Veterans' Services Oversight Division Director**

**Emily Pedersen, Internal Special Audit Unit Director**

**Alyssa Tasha, Director of Data Analytics Division**

**George Xenakis, Audit, Oversight and Investigations Division Director**

# TABLE OF CONTENTS

<b>8</b>	<b>2024 in Review</b>
<b>13</b>	<b>Section I: About the OIG</b>
<b>14</b>	<b>The OIG’s Mission, Vision, and Strategies</b>
<b>16</b>	<b>The OIG: From Inception to Present</b>
<b>20</b>	<b>Office Reorganization</b>
<b>22</b>	<b>Investing in OIG Staff</b>
<b>23</b>	<b>Leveraging Technologies</b>
<b>24</b>	<b>OIG Budget</b>
<b>25</b>	<b>Inspector General Council</b>
<b>26</b>	<b>Talk to Us</b>
<b>27</b>	<b>Section II: Investigations and Reviews</b>
<b>36</b>	<b>Section III: Legislative Recommendations</b>
<b>41</b>	<b>Section IV: Other Statutory Work</b>
<b>45</b>	<b>Section V: Health and Human Services Program Reviews</b>
<b>55</b>	<b>Section VI: State Police Oversight</b>
<b>63</b>	<b>Section VII: Transportation Oversight</b>
<b>73</b>	<b>Section VIII: Education and Outreach</b>
<b>82</b>	<b>Further Reading</b>
<b>86</b>	<b>Acknowledgments</b>
<b>87</b>	<b>Endnotes</b>
<b>90</b>	<b>Index</b>

## 2024 in Review

# Identifying Opportunities to Make Government Work Better

In many ways, 2024 was a watershed year for the Massachusetts Office of the Inspector General (OIG). The second full year of Inspector General Jeffrey Shapiro's term encompassed several initiatives to better position the OIG to carry out its mandate to prevent and detect fraud, waste, and abuse in the use of public funds and assets. The OIG optimized its operational capacities through an organizational restructuring that has allowed the office to more effectively deploy its resources. The OIG continued to expand the offerings of the OIG Academy and implemented new technologies to enhance the Academy's educational and outreach capabilities. The Inspector General continued to travel around the Commonwealth, meeting with municipal leaders, agency heads, and other stakeholders to identify opportunities to make government work better. The OIG continued to conduct meaningful investigatory and compliance work, and issued impactful reports and letters.

The OIG's 2024 initiatives involved a wide range of investigations, program reviews, and outreach, including:



**Inspector General Shapiro views traffic monitors at MassDOT's Highway Operations Center.**

## Star Store lease review

The OIG took an in-depth look at a 20-year agreement that the Division of Capital Asset Management and Maintenance (DCAMM) signed with a private developer to lease the historic Star Store building in downtown New Bedford for use by UMass Dartmouth's College of Visual and Performing Arts. DCAMM executed the lease pursuant to a legislative authorization. The Commonwealth spent \$60 million in rent, operating expenses, and other outlays during the term of the lease. At the end of the contract, the Commonwealth chose not to exercise a \$1.00 purchase option, citing the building's poor condition and capital needs.

The OIG identified various problems in the way the government agencies involved managed the lease, which led to high costs and low returns to the Commonwealth. The OIG cited flaws such as a noncompetitive procurement, lease terms which gave the developer no incentives to operate efficiently, and a lack of planning and agreement among the parties involved in the project. The Commonwealth wasted significant public funds by continuing to occupy the Star Store through short-term and month-by-month tenancies upon the expiration of the 20-year lease.



Following the Commonwealth's 20-year, \$60 million lease agreement with the owner of the Star Store, the building now sits vacant in downtown New Bedford.

## Clean energy initiatives

Since the start of his term, Inspector General Shapiro has devoted attention to the Commonwealth's clean energy initiatives and to safeguarding the large amounts of public funds pouring into this sector. In 2024, this advocacy resulted in the passage of Section 34 of Chapter 239 of the Acts of 2024, a law which streamlines procurement processes surrounding electric vehicles and compatible charging infrastructure. In the past, municipalities were required to procure electric vehicles like school buses as supplies and charging infrastructure as construction projects, resulting in more time-consuming, costlier processes. The new legislation allows jurisdictions to procure both vehicles and the compatible charging stations with a single procurement.

## Cannabis Control Commission

In June 2024, Inspector General Shapiro wrote to Senate President Karen Spilka and House Speaker Ron Mariano calling on legislative leadership to appoint a receiver to better manage the Cannabis Control Commission's (CCC) day-to-day functions. The Inspector General also urged legislators to amend the CCC's enabling statute, Chapter 94G of the Massachusetts General Laws, to put the agency in a better position to effectively regulate the



Inspector General Shapiro discusses the problems facing the Cannabis Control Commission on NBC Boston.

The OIG offered guidance to the town of Leyden for its procurement of two fire vehicles.



since it requires a complicated calculation to determine each individual's post-retirement maximum earnings. The Legislature created the task force in response to the OIG's recommendations that lawmakers simplify the formula for calculating these limits and increase its oversight of post-retiree earnings.

### OIG Academy Learning Management System

Hand-in-hand with its rigorous oversight of the Commonwealth and its municipalities, the Inspector General undertook several initiatives in 2024 to enhance the office's operations. The OIG implemented a new Learning Management System (LMS) for the OIG Academy, which presents a user-friendly online interface where Academy learners can easily access their live and self-paced courses and all associated materials. The LMS also simplifies course catalog navigation, registration, payments, and course history.

### Municipal impact

The Massachusetts OIG's mandate spans state and local government. It is the only statewide OIG in the nation with responsibility across both levels of government. To best carry out the OIG's mission of preventing and detecting fraud, waste, and abuse on the local level, the OIG has engaged in a year-long effort to meet with

Commonwealth's cannabis industry. That recommendation was based on the OIG's conclusion that the CCC's enabling statute is unclear, contradictory, and provides little guidance on the authority and respective responsibilities of the CCC's chair, commissioners, and executive director. Since 2022, the commission has spent over \$160,000 in public funds on mediation services to clarify its governance structure, which to date has failed to bring about improvements in the commission's operations.

### Post-retirement earnings cap

The OIG's advocacy resulted in the Legislature's creation of a 13-member task force to investigate post-retirement earnings caps for public employees returning to work for the Commonwealth or one of its subdivisions. The current law surrounding the amount of publicly funded earnings a post-retiree can make in addition to their pension states that earnings limits are dependent on the "salary that is being paid" for their former position. That number is specific to each retiree and is almost impossible for the Commonwealth to track and enforce



Inspector General Shapiro and the director of the OIG's Veterans' Services Oversight Division attended the topping off ceremony for the new Holyoke Veterans Home in November.



municipal leaders to understand the challenges they face that impact how they do their work. By connecting with municipalities, the OIG can learn where the pressure points for municipalities are, particularly in public procurements, understand the effect of those pressure points, and identify possible solutions to help government work better. The OIG also engages municipal leaders in discussions on education, best practices for public procurements, knowledge transfer, and business continuity. Each of these areas directly relates to how municipal governments operate most effectively.

### Stakeholder meetings

One goal of the OIG is to strengthen the lines of communication between the OIG, other public officials, state and municipal employees, and members of the public to improve how government operates. During the past year, the OIG has met with stakeholders at all levels of government to learn, share best practices, and promote innovative thinking about how we approach problem solving to make government work better.

### Proactive approach to mandate

Over the past year, the OIG has dedicated greater resources than ever to a proactive approach to better ensure that oversight and best practices reach further and deeper across the state. The OIG is known for the work it has historically done to investigate allegations of fraud, waste, and abuse. The OIG depends upon dedicated public employees and conscientious members of the public to report concerns to the OIG. A proactive approach enhances the OIG's ability to combat waste and abuse – risks that are not reported as frequently as fraud. The OIG uses this approach to find and address problems earlier so that education and prevention are the story, not criminal prosecution or a scathing report.



David Ishihara, Director of Aviation Operations, Safety and Security at Massachusetts Port Authority, gives Inspector General Shapiro and OIG staff an airside tour during an October site visit to Logan International Airport.

# The OIG in Action

## A Representative Sample of Results



### Dollars and Cents

- Led investigations that resulted in over \$1 million in restitution orders and civil recoveries
- Examined how the Commonwealth spent \$60 million on rent and other payments to lease the Star Store building in New Bedford, and made recommendations for future long-term leases
- Identified \$17 million in provider claims from a MassHealth autism program for MassHealth to review
- Reviewed two MBTA contracts for privatized customer services with a combined value of \$12 million and made recommendations to improve contract administration and vendor management
- Collaborated with MassDOT on a review of past due commercial lease payments and identified approximately \$1 million in outstanding rents and fees



### Quality, Integrity, Efficiency

- Drove EHS to implement a compliance program for improved vendor oversight
- Recommended best practices for the Department of Transitional Assistance to implement in managing a new multi-million-dollar contract for Electronic Benefits Transfer services
- Reviewed the Massachusetts State Police's internal controls designed to mitigate the risk of time fraud in overtime shifts
- Provided guidance to the Executive Office of Veterans Services in implementing its \$6.3 million electronic medical records system
- Approved 21 construction management at-risk projects with combined projected costs of \$2.5 billion



### Education and Outreach

- Engaged over 2,000 professionals from across the Commonwealth through the OIG Academy to increase their knowledge of procurements, public building projects, and good government practices
- Published three issues of the *OIG Bulletin* and launched an *OIG Advisory* series for local leaders
- Met with state and local officials from across the Commonwealth's 351 communities

ENGAGE • EDUCATE • INVESTIGATE

# About the OIG

## Year At A Glance

- Restructured the OIG into three bureaus: the Specialty and General Government Bureau; the Legal and Compliance Bureau; and the Operations, Training, and Publications Bureau
- Responded to 1,940 complaints over the OIG's Fraud Hotline; 332 complaints over the OIG's MassDOT Fraud Hotline; and 1,270 inquiries through Public Procurement Technical Support
- Enhanced the office's technological capacities by investing in tools such as a new Learning Management System for the OIG Academy and cloud environments for the Data Analytics Division and Office of the General Counsel

# The OIG's Mission, Vision, and Strategies

## Mission

The Office of the Inspector General (OIG) is an independent, non-partisan oversight agency mandated to prevent and detect fraud, waste, and abuse of public resources at the state and municipal levels across the Commonwealth of Massachusetts.

The OIG accomplishes this mission in three broad ways.

- Engages government leaders and employees on best governance and business practices to promote quality, integrity, and efficiency in public spending and programs
- Educates public employees on public procurement, fraud prevention, and program integrity
- Investigates complaints of fraud, waste, and abuse from public employees, vendors, and private individuals



Inspector General Shapiro speaks with Fitchburg Mayor Samantha Squailia as part of his listening tour through the state.

## Vision

The OIG makes government work better tomorrow than it does today through engagement, education, and oversight.

# Strategies and Principles

- Engage with stakeholders to understand the challenges at each level of government

*Meet regularly with government leaders at every level to better understand their challenges, identify risks, and develop and promote best practices*

- Deliver relevant, quality educational content

*Innovate to educate through leading edge educational programming and audience-specific publications and embrace multimedia opportunities*

The OIG's Transportation Unit and Inspector General Shapiro tour Boston's Central Artery tunnels with MassDOT's Highway Division.



OIG team speaks with members of the public at the Massachusetts Municipal Trade Show at the Hynes Convention Center in Boston.

- Promote accountability through oversight

*Investigate complaints of fraud, waste, and abuse, issue public reports with findings and recommendations, and, where appropriate, refer matters for further action by prosecutors, state ethics, or another agency*

- Use the right tool

*Employ the most effective methods for promoting good governance, best practices, and accountability*

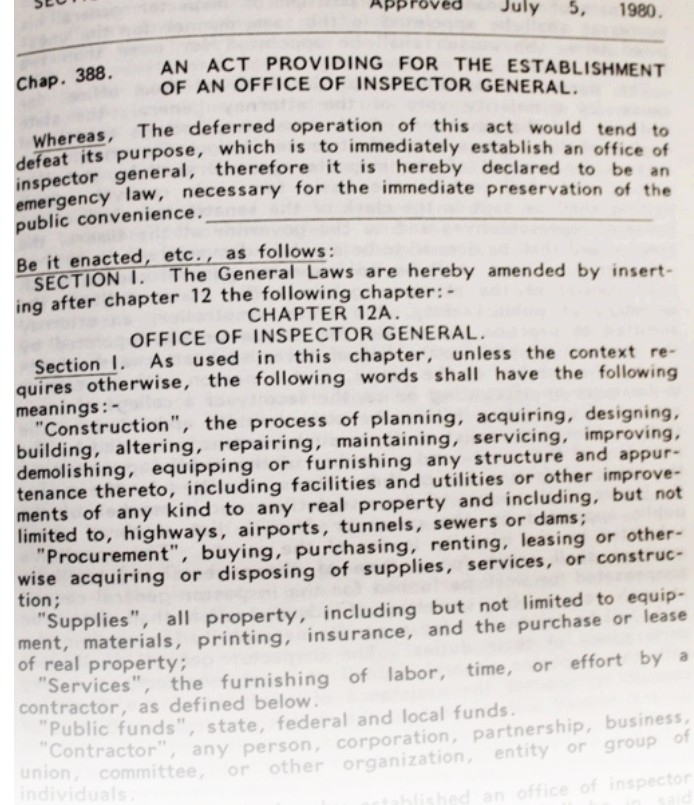
# The OIG: From Inception to Present

## Inspector Generals Across the Country

The Massachusetts OIG was the first statewide inspector general's office in the country. It continues to be the only office of the inspector general with jurisdictional authority over all state agencies and all municipal jurisdictions.

The concept of independent, nonpartisan offices with the purpose of overseeing government agencies to detect waste and abuse and to offer recommendations for improvement had already been in practice by the federal government by the time of the Massachusetts OIG's establishment. The first inspector general's office in the United States harks back to the country's founding. In 1777, the Continental Army created the position of inspector general to conduct trainings, inspections, and investigations to ensure that the army's meager resources were used wisely. The first non-military inspector general's office was formed in 1976 for the U.S. Department of Health and Human Services (HHS), with the mission of ensuring efficiency and detecting and preventing fraud, waste, and abuse in Medicare, Medicaid, and 100 other HHS programs. This was followed by the Inspector General Act of 1978, which created 12 more offices of inspectors general for federal agencies. Today, there are over 70 statutory offices of inspectors general for federal agencies, and well over 100 state-level or municipal-level offices.

In 1996, the Association of Inspectors General (AIG) was established. The AIG is an umbrella organization of state, local, and federal inspectors general and other professional staff members from around the country. Its purpose is to promote quality standards, professional development, networking, and a shared mission to inspire government entities to embrace the inspector general model.



**“The office of inspector general shall act to prevent and detect fraud, waste and abuse in the expenditure of public funds, whether state, federal, or local, or relating to programs and operations involving the procurement of any supplies, services, or construction, by agencies, bureaus, divisions, sections, departments, offices, commissions, institutions and activities of the commonwealth, including those districts, authorities, instrumentalities or political subdivisions created by the general court and including the cities and towns.”**

**-Massachusetts General Laws,  
Chapter 12A, Section 7**

**“I think it’s accurate to say that the American people are fed up with the treatment of American tax money in a way that involves fraud and mismanagement and embarrassment to the Government . . . I’m very grateful that we have this chance to protect the taxpayer’s dollar, to root out corruption, fraud, waste, [and] mismanagement in the most effective and enthusiastic fashion.”**

**-President Jimmy Carter’s remarks at the Bill Signing Ceremony for the Inspector General Act of 1978**

## **The Ward Commission**

The Office of the Inspector General for the Commonwealth of Massachusetts (OIG) was established by the Legislature in 1980 as the first state-level inspector general’s office in the country at the recommendation of the Special Commission Concerning State and County Buildings, otherwise known as the Ward Commission.

**A deteriorating parking garage at UMass Boston was one of the many substandard projects that led the Ward Commission to recommend the creation of the Office of the Inspector General.**

The Ward Commission, headed by former President of Amherst College John William Ward, was created with the purpose of investigating corruption in state building and construction contracts following an extortion scandal surrounding a project management contract for the University of Massachusetts’s new Boston campus.

The Ward Commission spent two and a half years investigating allegations of corruption in the awarding of state and county building contracts in Massachusetts. Its 1981 report, comprising 12 volumes and thousands of pages, followed from the review of over 1,400 public building contracts. The report found that the UMass building scandal was just one in a pattern of government building contracts involving bribery and extortion. The report made the following general findings:

- Corruption was a “way of life” in the Commonwealth;
- Political influence, not professional performance, was the prime criterion in doing business with the state;
- Shoddy work and debased standards were the norm; and
- The “system” of administration was inchoate and inferior.





Joseph Barresi, appointed the first Massachusetts Inspector General in 1981, said that he began his term with “good wishes, an empty floor, a desk, and a statute.”

**“The particular facts of the Commission’s long investigation comprise a general pattern: In the award of contracts for the construction of state and county buildings, corruption has been a way of life. For a decade at least, across Republican and Democratic administrations alike, the way to get architectural contracts was to buy them.”**

**-Final Report to the General Court of the Special Commission Concerning State and County Buildings, Volume 1**

The report determined that this pattern of corruption in Massachusetts resulted in billions of wasted dollars and government buildings that were unsafe.

In addition to recommending reforms to the process of awarding public contracts, the Ward Commission also recommended and drafted legislation to establish the creation of an independent statewide office of the inspector general that would cooperate with existing agencies to “conduct wide-ranging, systematic investigations to determine whether there has been fraud or abuse in a particular project or program.” The Ward Commission envisioned the office as an “institutional mechanism which would review regularly government contracts awarded within Massachusetts.” The office would perform prevention and program reviews standing outside of the traditional roles of prosecutors at the state and local levels and requiring more holistic investigations than those that fell within the role of the State Auditor. Following an investigation uncovering fraudulent activity, the office would “produce recommendations for reform within the system which would make a recurrence of similar criminal activities less likely in the future.”

**“The basic concept behind the Office of the Inspector General is that any institution, a corporation, a university, let alone the institution of government, must build into itself a mechanism for self-criticism and self-correction.”**

**-Final Report to the General Court of the Special Commission Concerning State and County Buildings, Volume 1**

Pursuant to the commission’s recommendations, in July 1980 the Legislature passed Chapter 388 of the Acts of 1980, which enacted Chapter 12A of the Massachusetts General Laws and established the OIG. Joseph Barresi was appointed as the first Inspector General in 1981.

## **Evolution of the Massachusetts OIG**

Throughout his tenure as the first Inspector General of the Commonwealth, Joseph Barresi worked with the Legislature to draft and pass Chapter 30B of the Massachusetts General Laws, the Uniform Procurement Act. That statute was enacted in 1990 and established statewide law governing municipal contracts and enforcing open and competitive procurements.

Since its inception, the OIG has conducted hundreds of investigations into allegations of waste and abuse of public funds at the state and municipal levels. Major investigations have included those related to waste and corruption surrounding Boston’s Central Artery/Tunnel Project, also known as the “Big Dig”; fraud involving a major software procurement that resulted in the convictions of a former Massachusetts Speaker of the House and other officials; and the theft of school funds by a former president of Westfield State University. Among the wide-ranging reforms prompted by OIG investigations over the years are those related to municipal banking practices, the Commonwealth’s



**The OIG identified millions of dollars of waste in contracts related to Boston’s Central Artery/Tunnel Project.**

healthcare reimbursement program, and training requirements for public college trustees.

The OIG has also served as a mechanism for the prevention of fraud, waste, and abuse of public funds through education and outreach efforts. In 1997, the OIG established its Massachusetts Certified Public Purchasing Official (MCPPO) program. This program began as one general procurement class with the purpose of educating public purchasing officials and individuals in the private sector who conduct business with public entities on the laws and best practices surrounding government contracts. The OIG awarded the first 200 MCPPO Designations in 1999. Today, the OIG’s educational arm is known as the OIG Academy, reflecting a broader offering of classes which now includes courses on fraud prevention, contract administration, design and construction planning, cybersecurity, and many related topics.

Forty-four years and five inspector generals after its founding, the OIG operates with approximately 90 professionals, organized among three bureaus which together make up 12 divisions. Collectively, these divisions cover the breadth of state and municipal oversight that is the office’s statutory responsibility. The Commonwealth has much to be proud of with its first-in-the-nation OIG.

# Office Reorganization

Since his appointment in October 2022, Inspector General Shapiro has focused on optimizing the OIG’s operations. In furtherance of that goal, he completed an officewide reorganization in 2024 that streamlined the OIG’s divisions and personnel into three bureaus, each headed by a bureau chief directly reporting to the Inspector General.

Under the new structure, the three bureau chiefs are empowered to make timely, business-oriented decisions on matters ranging from internal operations to program reviews and investigations.

**Deputy Inspector General Susanne M. O’Neil leads the [Specialty and General Government Bureau](#), which includes the OIG’s three statutorily-created units and four other divisions that focus on government oversight.**

## Statutory units

### Bureau of Program Integrity

Oversees agencies and programs administered by the Executive Office of Health and Human Services.

### Division of State Police Oversight

Monitors the quality, efficiency, and integrity of Massachusetts State Police operations.

### Internal Special Audit Unit

Oversees Massachusetts transportation funds, monitoring operating and capital programs of MassDOT and the MBTA.

### Healthcare Division

Focuses on oversight of healthcare delivery and access under the Massachusetts Medicaid program (MassHealth) and the Health Safety Net.

### Veterans’ Services Oversight Division

Focuses on oversight of the services that the Commonwealth and its municipalities provide to veterans, including services of the state veterans homes.

### Special Funding Oversight Unit

Conducts program reviews related to federal and state funds, such as COVID-19 relief funds, used for special purposes.

## Public Procurement and General Government Oversight

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Reviews spending and programs by municipal and state government that do not fall within another OIG division.

General Counsel Eugenia M. Carris leads the [Legal and Compliance Bureau](#).

## Audit, Oversight and Investigations Division

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Investigates allegations of criminal and civil misconduct in the use of public assets across all sectors of state and local government.

## Office of the General Counsel

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Provides the OIG with legal advice on litigation, investigations, compliance, procurement of services, human resources, and other legal matters.

## Government Outreach and Public Policy Division

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Oversees the OIG's policy and legislative initiatives and conducts state and municipal engagement work.

Chief Operating Officer Katie Verma leads the [Operations, Training and Publications Bureau](#), which manages the OIG's administrative, fiscal, human resources, and information technology functions. The bureau also oversees the work of the OIG's communications and publications teams.

## Data Analytics Division

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Supports OIG divisions by building data-driven analyses and investigations.

## Learning and Development Division

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Provides training and certification programs through the OIG Academy and Public Procurement Technical Support on public purchasing laws, fraud prevention, and other topics integral to good government.

## Executive Administration

Human Resources

Finance

# Investing in OIG Staff

The OIG has a dedicated and exceptional team. OIG staff members bring a wealth of knowledge and experience from backgrounds in the military, federal law enforcement, state and federal government, prosecutors' offices, accounting, compliance, auditing, data analytics, journalism, and private sector business. Over 35% of the office's employees have post-graduate degrees in fields related to the OIG's work: law, public policy, public administration, business, data science, and criminal justice.

Annually, the OIG selects employees for certification programs and helps them complete continuing education requirements. Over the past year, the OIG continued to invest in the education and credentialing of its staff through internal and external programs, like the [Association of Certified Fraud Examiners \(ACFE\)](#) and the [Association of Inspectors General \(AIG\)](#).

**12** employees hold the **Certified Fraud Examiner Certification** from the ACFE.

**25** employees hold certifications from the AIG as **Certified Inspectors General, Certified Inspector General Auditors, Certified Inspector General Inspectors/Evaluators, and Certified Inspector General Investigators.**

The OIG encourages all staff to attend trainings and programs related to their area of expertise. Over the past year, this has included trainings and programs related to IT and cybersecurity, human resources, publications and communications, and investigations.

**“While I am honored to serve as Inspector General and to have the opportunity to set the strategic path for the agency, I am humbled to serve with a dedicated team of professionals committed to the finest ideals of public service.”**

**-IG Jeffrey Shapiro**

To support and develop leaders within the office, the OIG supervisors and leadership team members completed a four-day supervisor training program conducted by the UMass Collins Center.

In 2024, the OIG also reimagined the annual employee evaluation process in a way that brings professional development to the forefront. Combining performance reviews with a skills and experience matrix and a program for coaching and leadership training, the OIG aims to provide its employees with a path for professional growth.



# Leveraging Technologies

Since the start of his term, Inspector General Shapiro has made significant investments to upgrade the OIG's systems and hardware to improve operational efficiency while reducing the office's environmental footprint. In 2024, the OIG completed several technological initiatives.



## OIG Academy Learning Management System

The OIG Academy introduced a new Learning Management System (LMS) that streamlines processes for Academy learners. The LMS provides an online dashboard where learners can register for courses, view their transcripts, and access an updated learning platform. The new system also simplifies payments.



## DocuSign

The OIG adopted the eSignature solution DocuSign, with the goals of increasing efficiency and creating true digital signatures.




## OIG Cloud Architecture in AWS

As part of its initiative to manage its IT infrastructure, the OIG engineered and deployed the OIG Cloud in Amazon Web Services (AWS), with environments for the Data Division and the Office of the General Counsel. This effort enhances the office's ability to perform comprehensive data analysis and lays the groundwork for incorporating advanced capabilities into office functions.



## Electronic Filing System

With the goals of protecting data security, enhancing accessibility to documents, improving efficiency, and building on a commitment to knowledge transfer and business continuity, the OIG transitioned the retention of its personnel records from a manual to an electronic filing system.



**“As a seasoned public administrator, I believe that IT systems are key to effective operations. I have made IT upgrades a priority.”**

**- IG Jeffrey Shapiro**



### Employee Reimbursements

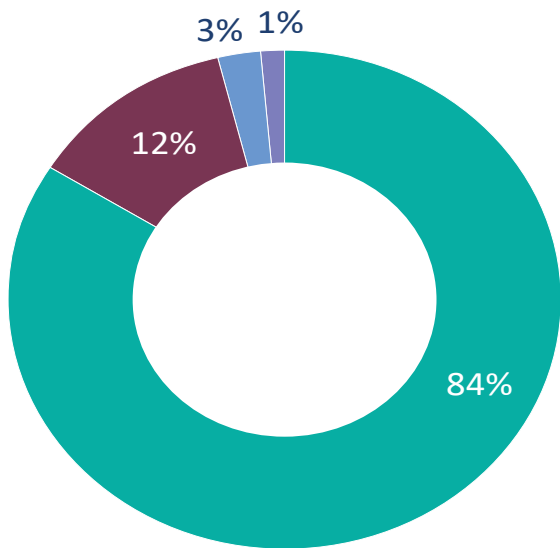
In line with the OIG’s overall transition to a digital environment and the goal of more centralized recordkeeping, employees now enter their reimbursement submissions in the Massachusetts Human Resources Compensation Management System’s Self-Service Time and Attendance. This change streamlines the process, shortens turnaround time, and retains digital files of reimbursement submissions.



### Cybersecurity and Enhanced Vulnerability Management

Partnering with the Executive Office of Technology Services and Security, the OIG launched a vulnerability management program for cyber-related activity, which features active scanning and vulnerability reports to combat cybersecurity threats. The office also introduced tools for employees to report potential cybersecurity risks.

# OIG Budget



## FY24 Funding

Direct Appropriations	\$8,000,728
OIG Academy Revenue	\$1,175,000
Health Safety Net Trust Fund	\$235,955
Pandemic Reserve	\$114,873
<b>Total</b>	<b>\$9,526,556</b>

## FY24 Spending

### Staffing



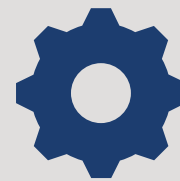
83%

### Information Technology



12%

### Operations



5%

# Inspector General Council

**The Inspector General Council (IG Council), established by Section 3 of Chapter 12A of the Massachusetts General Laws, is composed of the Attorney General, State Auditor, State Comptroller, and Secretary of Public Safety and Security or their designees, along with two members appointed by the Governor, one member appointed by the Attorney General, and one member appointed by the State Auditor.**

The Inspector General meets with the council at least quarterly. Agendas are posted on the OIG's website and sent to the Secretary of the Commonwealth at least 48 hours prior to the meeting, consistent with the Commonwealth's open meeting law. In 2024, the IG Council held four public meetings on February 29, May 9, August 8, and November 7.

The Inspector General may consult with council members or request their assistance on OIG matters. Among other functions, the council approves summonses for witness testimony and sets the Inspector General's salary.

Current members of the IG Council are:

**Susan Terrey, Chair** – By designation of the Secretary of Public Safety and Security

**Michael Leung-Tat, Vice Chair** – By designation of the State Auditor

**Jennifer Cotter** – By designation of the Attorney General

**Comptroller William McNamara** – By statute

**Michael Caira** – By the Governor's appointment

**Dale Hamel, Ph.D.** – By the State Auditor's appointment

**James Morris** – By the Attorney General's appointment

**Christopher Walsh** – By the Governor's appointment

# Talk to Us

The OIG relies on the public in carrying out its tasks of preventing and detecting abuse of public resources and driving good government. Much of the OIG’s work stems from public input.

## The OIG’s Fraud Hotline receives reports of fraud and concerns related to state and local government spending.

While most people choose to reach the OIG by telephone, email, or online form, the OIG has an open-door policy. Anyone can visit our offices in **Room 1311, Floor 13, One Ashburton Place, Boston, MA 02108** or send us a letter by mail.

In 2024, the OIG’s  
**Fraud Hotline** received

**1,940**

reports and complaints.

## The OIG’s MassDOT Fraud Hotline, meanwhile, is available for reports of transportation-related fraud.

This transportation hotline is also available by phone, email, or online form.

In 2024, the OIG’s  
**MassDOT Fraud  
Hotline** received

**332**

complaints.

## The OIG also offers technical assistance on questions related to the Commonwealth’s Uniform Procurement Act, Chapter 30B of the Massachusetts General Laws, through its Public Procurement Technical Support.

The public and government employees can access the OIG’s Public Procurement Technical Support through phone or email.

In 2024, the OIG’s  
**Public Procurement  
Technical Support**  
received

**1,270**

inquiries.



### Fraud Hotline

Tel: (800) 322-1323

Email: IGO-FightFraud@mass.gov



### MassDOT Fraud Hotline

Tel: (855) 963-2580

Email: MassDOTFraudHotline@mass.gov



### Public Procurement Technical Support

Tel: (617) 722-8838

Email: OIGProcurementSupport@mass.gov

# Investigations and Reviews

## | Year At A Glance

- Concluded that a 20-year commercial property lease which the Division of Capital Asset Management and Maintenance entered on behalf of UMass Dartmouth with a New Bedford developer wasted public funds
- Made investigative findings and recommendations on a number of matters across state and local government, including issues related to a marijuana business host community agreement; timekeeping controls; and the disposal of surplus inventory
- Reviewed the Commonwealth's veterans homes' adherence to OIG recommendations from prior reviews, including the implementation of an electronic medical records management system
- Published a report reviewing MassHealth's Applied Behavioral Analysis (ABA) Program for children with autism, identifying up to \$17.3 million in claims for MassHealth to review

OIG investigations and reviews may result in various outcomes, including agreements to resolve a matter, public letters, investigatory reports, program review reports, or prosecutions.

The OIG has concluded its work on the matters described below. Other work not described in this report is ongoing and remains confidential.

## Agreements – State Contract Overcharges

In August 2024, the OIG reached an agreement with office supply retailer W.B. Mason to refund nearly \$300,000 to state and local agencies that purchased supplies at incorrect prices through a state contract.

**An OIG investigation found that customers were inadvertently overcharged \$284,157.29 over a five-year period, despite prices specified in a pre-negotiated state contract.**

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 a portion to the OIG to offset its investigative costs.

## Public Letters

### Marijuana Business Host Community Agreement

In May 2024, the OIG issued a letter following a review of the **town of Uxbridge's** approval process of a marijuana business host community agreement (HCA) issued to **Barry Desruisseaux**. Desruisseaux was the owner of a marijuana retail business, **Ironstone Express, Inc.** The OIG found that Desruisseaux modified the HCA before signing and returning it to the town. The changed HCA included terms more favorable to Desruisseaux's business, and no town official reviewed the returned agreement before the acting town manager signed it.

**The OIG recommended the town implement controls to prevent unnegotiated changes to contracts and further recommended a review of Desruisseaux's HCA to determine whether legal remedies are available.**

### Town-Affiliated Nonprofits

In August 2024, the OIG published a letter to the **town of Blackstone** following an investigation into possible misuse of **Council on Aging** funds. The tenure of the **former director of the Council on Aging (CoA)** partly overlapped with the period when she served as president of the **Friends of Blackstone Council on Aging (FBCoA)**, a 501(c)(3) nonprofit organization affiliated with the CoA.

**The OIG concluded that funds of the CoA and the FBCoA were too closely intertwined and accordingly recommended that the town enact policies to keep the finances of town-affiliated 501(c)(3) organizations separated. The OIG further recommended that such organizations disclose the identities of their officers and maintain detailed financial records.**

## Timekeeping Controls

In November 2024, the OIG issued a letter to the **town of Georgetown** and the **town's conservation commission** following an investigation into alleged time fraud of a former employee. OIG investigators were unable to determine the validity of those allegations due to insufficient recordkeeping. The OIG did find that the town reimbursed the former employee for vehicle mileage without supporting documentation.

**The OIG recommended that the town and the commission work together to establish clear supervisory responsibility and timekeeping controls. The OIG also recommended that town officials expand existing policies regarding vehicle mileage reimbursement.**

The OIG published a letter in August 2024 after reviewing the **Massachusetts Department of Conservation and Recreation's (DCR)** and the **Massachusetts Environmental Police's (MEP)** Interdepartmental Service Agreement (ISA) for MEP police details worked at DCR's state parks and pools. The OIG found that MEP did not comply with the reporting provisions of the ISA by failing to submit monthly shift reports to DCR, which DCR should have used to verify the accuracy of MEP's charges for its shifts.

**The OIG recommended that DCR and MEP implement policies to ensure there is sufficient data to verify hours worked on DCR details by MEP and other law enforcement agencies.**

## Surplus Inventory

In October 2024, the OIG issued a letter to the **town of Orange** regarding its disposal of surplus inventory related to the demolition and renovation of school buildings. An OIG review found that the Orange Elementary School Committee declared unspecified items as surplus without determining their value. The town also donated kitchen equipment to a local restaurant and a local nonprofit

without an official vote. The OIG found that the town violated Section 15 of Chapter 30B by not ascertaining the value of items before declaring them as surplus and by transferring items to various entities without a formal vote.

**The OIG recommended that the school department and the town of Orange adopt transparent and competitive procedures for the disposal of surplus items valued at less than \$10,000.**

## Procurements

In August 2024, the OIG issued a letter to the **Executive Office of Education (EOE)** after a former **Department of Early Education and Care (EEC)** commissioner entered a contract for strategic planning services with a consulting firm. The investigation concluded that the procurement was not fair and competitive, that EEC failed to advertise the request for proposals (RFP) for a commercially reasonable period of time, and that the contracting parties communicated outside of the formal procurement process.

**The OIG recommended that EOE establish and monitor compliance with departmental policies and procedures, allow a minimum response time for RFPs, and ensure that employees are adequately trained on procurement processes.**

**The town of Orange's disposal of school supplies accompanied the demolition of Dexter Park Elementary School and the renovation of Fisher Hill School.**



# Investigatory Reports

## Star Store Lease

In September 2024, 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 reviewing how the Commonwealth procured 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.

**Among other things, the report attributes the waste of public funds associated with the 20-year lease to a procurement that had no competition, lease terms which included no incentives for landlord efficiency, and a general lack of shared vision and accountability over this economic development project.**

In 2000, the **Division of Capital Asset Management and Maintenance (DCAMM)** entered a 20-year agreement with a private corporation, **Star Holdings, Limited Partnership** (Star Holdings), to lease the historic **Star Store** building in New Bedford for use by the **University of Massachusetts Dartmouth (UMD)**. UMD's College of Visual and Performing Arts moved into the building in 2001 and conducted classes there until 2023. In addition to regular rent payments, the lease required the Commonwealth to cover the building's operating costs and to make small monthly payments into an account designated for replacing capital items. The lease also included an option for the Commonwealth to purchase the property from Star Holdings at the end of the agreement for \$1.00.

The Commonwealth invested significant resources in the form of rent and other payments over the life of the lease – totaling more than \$60 million. At the end of the contract in 2021, the Commonwealth executed expensive short-term tenancies through 2023. The Commonwealth

ultimately did not exercise its option to purchase the building for \$1.00, citing the building's substandard condition and the cost of needed renovations.

The OIG found that the original legislation in 1997 authorizing DCAMM to procure a property in New Bedford for use by UMD resulted in a procurement process that was not open and competitive. The Star Store was the only building meeting the legislation's specific criteria. At that time, then-Inspector General Robert Cerasoli rightly pointed out that this lack of competition would not give the landlord any incentive to propose terms favorable to the Commonwealth. The OIG further found that, throughout the life of the contract, none of the governmental entities involved – DCAMM, UMD, or the Legislature – agreed on a long-term plan for the Star Store by which the necessary repairs and improvements would have been made to make the \$1.00 purchase option beneficial to the Commonwealth.

The OIG concluded that the Commonwealth wasted millions of dollars during the course of the 20-year lease. Additionally, the OIG found that the Commonwealth wasted at least \$4 million during its subsequent short-term tenancies at the Star Store.



## Update on Holyoke Soldiers' Home, May 2016 to February 2020

The OIG has been tracking the implementation of its recommendations detailed in its April 2022 report, *Holyoke Soldiers' Home, May 2016 to February 2020* and in a May 9, 2023 letter related to the certifications of the homes, fiscal practices, an ombudsperson program, and electronic medical records.

**In a December 2024 letter, Executive Office of Veterans Services (EOVS) Secretary Jon Santiago shared that after many months of work, both veterans homes had been granted licenses from DPH as long-term care providers.**

Both homes have also been certified by the federal Centers for Medicare and Medicaid Services to participate in the Medicare and Medicaid programs, in compliance with Section 16 of Chapter 115A of the Massachusetts General Laws.

**As of the end of 2024, EOVS had ensured that most of the OIG's recommendations had been implemented for internal processes and fiscal controls. These steps will increase transparency and accountability at both homes.**

The OIG continues to closely monitor the open recommendations.

The OIG also had made recommendations for an ombudsperson program. In 2024, the OIG reviewed the program and provided EOVS with feedback on the program policies and processes.

Lastly, the OIG had found that the Commonwealth's veterans homes needed to prioritize adopting an electronic medical records

(EMR) management system to address longstanding vulnerabilities. In 2022, EOVS awarded a contract for the development of an EMR management system after several years of unsuccessful procurement efforts. The new system for both of the homes went live in 2024. Given the significant expenditure of time and public funds EOVS has invested in the system, in 2024 the OIG reviewed findings from reports released by the U.S. Department of Veterans Affairs Inspector General on that office's investigations of the electronic health records modernization project in VA health facilities across the nation. The OIG shared the most relevant of these findings with EOVS to further inform its ongoing implementation and operation of the EMR management system and to mitigate the risk of additional costs and delays.



**IG Jeffrey Shapiro signs the final beam at the topping off ceremony for the new Holyoke Veterans Home facility.**

# Program Reviews

## Pandemic Funding Recipients

### Local Food Purchase Assistance Cooperative Agreement Program

In January 2024, the OIG issued a letter to the **Massachusetts Department of Agricultural Resources (MDAR)** following a review of its internal administrative plan for the **Local Food Purchase Assistance Cooperative Agreement Program (LFPA)**. The program was supported by \$8,400,000 in ARPA funding. Through LFPA, MDAR awards funds to entities that buy food from socially disadvantaged farmers and producers to provide to underserved communities. The OIG found that MDAR's administrative plan described measures to prevent fraud, waste, and abuse, such as quarterly check-in calls, site visits, and reviews of itemized expenses prior to payment. The OIG recommended that MDAR implement written guidance regarding its site visits, outline methods that staff should use to determine program eligibility, and contact beneficiaries to ensure that food was donated as reported.

### Rental Housing Production Program

In May 2024, the OIG issued a letter to the **Executive Office of Housing and Livable Communities (EOHLC)** following a review of its internal administrative plan for the **Rental Housing Production Program**, which was supported by \$105,000,000 in ARPA funding. This program supported the production and preservation of affordable rental housing for residents of communities disproportionately impacted by the COVID-19 pandemic. The OIG found that EOHLC's administrative plan described performance measurement and monitoring processes. The OIG recommended that EOHLC's plan describe specific tasks for which vendors were responsible, schedules for oversight processes such as site visits, and schedules for collection of data related to key performance indicators.

### Elementary and Secondary School Emergency Relief Fund

In May 2024, the OIG issued a letter to the **Massachusetts Department of Elementary and Secondary Education (DESE)** following a review of its administrative plan for the **Elementary and Secondary School Emergency Relief Fund (ESSER)**, which was supported by \$1,831,416,990 in ARPA funding. ESSER was intended to provide COVID-19 emergency relief to local educational agencies. The OIG found that DESE's administrative plan required recipient school districts to provide regular reporting, undergo periodic audits, and complete detailed applications for funds. The OIG recommended that DESE ensure that recipient school districts thoroughly complete implementation plans, describe additional review processes for high-risk school applicants, and ensure that recipient school districts are aware of spending deadlines for ESSER funds.

### Commonwealth Cares for Children (C3) Program

In December 2024, the OIG issued a letter to the **Department of Early Education and Care (EEC)** following a review of its administrative plan for the **Commonwealth Cares for Children (C3) Program**. The program was supported by \$510,544,054 in ARPA funding. Through the C3 Program, EEC provides grants to child care providers for day-to-day operations and workforce costs. The OIG found that EEC has a written process for its staff to review applications for potential fraud or misrepresentations, as well as written policies for conducting provider risk assessments and conducting on-site monitoring. The OIG recommended that EEC ensure that its internal policies document all tasks required of third-party monitoring vendors, include guidance on measuring the performance of third-party vendors, and identify contractually designated project managers. The OIG also recommended that EEC leaders be clear on contract terms, options, amendments, and end dates.

## Career Technical Initiative

In December 2024, the OIG issued a letter to the **Commonwealth Corporation (CommCorp)** following a review of its administrative plan for the **Career Technical Initiative (CTI)**, which was supported by \$25,000,000 in ARPA funding. Through CTI, CommCorp, a quasi-public entity, provides financial support to vocational schools that run programs for unemployed and underemployed individuals to develop needed skills for jobs in fields such as welding, carpentry, and electrical work. The OIG found that CommCorp has written policies to verify participant eligibility, monitor key performance indicators, and track program benchmarks. The OIG recommended that CommCorp ensure that updated policies are incorporated into program guidance in a timely manner. The OIG also recommended that CommCorp clarify rules for the disposition of CTI-produced goods, collect and review grantee disposition policies, and solicit participant feedback through surveys as a program monitoring tool.

**As with the HCD's analysis of MassHealth's ABA Program, many of the OIG's program reviews and investigations rely on sophisticated data gathering and analysis completed by the OIG's Data Analytics Division.**

**In 2024, the Data Division supported the OIG's mission in four broad ways:**



**Acquired data for OIG division investigations and reviews;**



**Analyzed data and prepared reports, dashboards, and visualizations;**



**Developed and implemented the OIG's enterprise data management strategy; and**



**Led data education efforts.**

## MassHealth and Health Safety Net

In March 2024, the OIG's Healthcare Division (HCD) published a report detailing its review of MassHealth's Applied Behavioral Analysis (ABA) Program, which provides treatment to MassHealth-eligible children diagnosed with autism spectrum disorder.

MassHealth ABA performance specifications require service providers within MassHealth-managed care entity networks to ensure that licensed applied behavior analyst (LABA) staff provide supervision to paraprofessional staff at a ratio of one hour of supervision for every ten hours of direct ABA services. The HCD conducted an analysis of ABA providers to identify billing outliers related to these ABA services.

### The HCD determined:

- **MassHealth paid \$16,761,445 for ABA service claims that exceeded the 10:1 supervision ratio.**
- **MassHealth paid \$439,632 in claims submitted by providers of ABA services who billed more than 24 hours of service for a single member on a given date.**
- **MassHealth paid \$162,535 for ABA claims for services provided on major holidays.**

**The OIG recommended that MassHealth review the outlier billing, institute controls to screen for improper billing, look for opportunities to recover overpayments, and ensure that ABA services for children with autism receive the supervision critical to early intervention and their development of adaptive skills.**

# Criminal Prosecutions

Prosecutions in the following matters that were investigated by the OIG progressed in 2024. Charges are allegations. A defendant is presumed innocent unless the defendant enters into an agreement, admits to sufficient facts, or is proven guilty in court.

## Matters with the U.S. Attorney's Office

In June 2024, the former chair of the **town of Grafton Board of Selectmen, Bruce Spinney**, was indicted on charges related to defrauding investors of his cannabis company, **Noble Manna**. The indictment alleges that after resigning from his town position, Spinney solicited hundreds of thousands of dollars from investors for constructing and licensing his new marijuana dispensary venture. Instead, he used the money to pay down previously existing debts for his other businesses. Spinney faces three counts of wire fraud and one count of conducting an unlawful monetary transaction. As of this report's publication, a trial is scheduled for October 6, 2025.

In August 2024, **Katherine Reynolds** was indicted by a federal grand jury and arraigned on wire fraud and money laundering charges related to fraudulent Paycheck Protection Program loan applications. An investigation showed that Reynolds allegedly filed two false applications claiming she and her then-86-year-old father had earned over \$100,000 per year providing massage services in their home. The applications also included fraudulent tax forms not filed with the Internal Revenue Service. As of this report's publication, the matter is scheduled for a final pretrial conference on June 18, 2025 and a jury trial is scheduled for July 7, 2025.

In September 2024, **Alihea Jones** pleaded guilty to defrauding her former employer, the Executive Office of Housing and Livable Communities (EOHLC), as well as the

U.S. Small Business Administration.<sup>1</sup> Following her termination from EOHLC, Jones logged into the housing agency's system and altered the routing and account numbers for four Residential Assistance for Families in Transition (RAFT) applications for her own benefit.<sup>2</sup> Earlier the same year, Jones fraudulently obtained a \$187,000 Paycheck Protection Program loan. Jones pleaded guilty to five counts of wire fraud and was sentenced to 10 months in prison, followed by three years of supervised release, and was ordered to pay \$222,074 in restitution.

## Matters with the Attorney General's Office

In February 2024, a Suffolk Superior Court judge ordered **Manuel Duran**, former CEO of **Casa Nueva Vida, Inc.** (CNV), to pay \$382,843.67 in restitution for embezzling nearly \$1.5 million from CNV between 2012 and 2021. He had agreed to pay \$6 million in a related civil action. Duran's embezzlement schemes consisted of using a shell company to lease property he owned to CNV at an inflated cost, cashing checks paid to fabricated vendors for projects that were never undertaken, and depositing paychecks issued to an employee who never performed any work into his own bank account. Duran pleaded guilty in 2022 to several counts of perjury, larceny, and making false entries in corporate books. Duran was also sentenced to one year in the Suffolk House of Correction.

Casa Nueva Vida's headquarters in Jamaica Plain at the time of the OIG's investigation.



In December 2024, **Robert Dombek** pleaded guilty to charges related to filing a false affidavit with the Hampden County Retirement Board stating that a deceased retired public employee was still alive. In doing so, Dombek stole \$27,111 in benefits. Dombek was sentenced to four and a half years in a house of correction, with one year to serve. Dombek was also ordered to pay \$27,111 in restitution and abstain from working with the elderly during his probation.

Also in December 2024, **Jeffrey Nazarian** pleaded guilty to charges related to collecting the pension of a deceased public retiree. Nazarian failed to notify the Massachusetts State Retirement Board of the retiree's death and used the retiree's pension benefits to pay credit card bills. Nazarian also forged checks to himself from the retiree's bank account. Nazarian pleaded guilty to five counts of forgery, larceny, perjury, and uttering. Nazarian was sentenced to three years' probation. As of this report's publication, a restitution hearing is scheduled for May 28, 2025.

In October 2024, **Steven Stoico** was arraigned in Suffolk Superior Court on indictments related to fraudulent pandemic-era rental assistance applications. Stoico is accused of filing seven false applications in 2021 as the landlord of a property he owned in East Boston. Three of those were granted, resulting in \$95,400 in payments to Stoico. The remaining four applications seeking \$136,200 in rental assistance were denied. An investigation revealed that the purported tenants listed in those applications did not live in the reported units during the times claimed and that the rental assistance applications contained fabricated supporting documents. The investigation also revealed that co-defendant **Maria Grasso** collaborated with Stoico to file duplicative applications. As of this report's publication, a pretrial hearing for Stoico is scheduled for May 28, 2025.

In June 2024, **Katherine Quigley** pleaded guilty in Suffolk Superior Court to 12 charges for her involvement in a scheme to collect \$97,000 through fraudulent unemployment claims. The judge sentenced Quigley to a

two-year suspended sentence, with two years of probation, and ordered that she pay \$61,941 in restitution. A co-defendant, **Aaron Fernandes**, pleaded guilty in April 2024 to seven charges, was sentenced to six months imprisonment, and was ordered to pay \$44,823 in restitution. **Rebecca Holmes**, a third co-defendant who was arraigned in March 2023, is currently the subject of an arrest warrant.

## Matter with District Attorney's Office

In April 2024, **Daniel Galvis**, former police chief for the town of Leyden, was arraigned on charges of having illegally taken possession of equipment owned by the police department, including a truck, a skid steer loader, a motor, and a trailer. Galvis pleaded not guilty to counts of larceny and violating the standards of conduct for public employees. As of this report's publication, a trial is scheduled for May 19, 2025. The Northwestern District Attorney's Office is prosecuting the case.

# Legislative Recommendations

## Year At A Glance

- Published a report calling for legislative changes to increase enforcement of post-retirement earnings limits for Commonwealth state and municipal employees returning to public service, resulting in the Legislature's creation of a task force to evaluate the process, limits, and controls for post-retirement employment
- Testified before the Legislature on the lack of clarity in the Cannabis Control Commission's enabling statute, specifically related to the roles of the board chair and the executive director
- Filed bills for consideration during the 2025 – 2026 legislative session relating to issues such as procurement and retail electricity suppliers

# Post-Retirement Earnings Cap

**In March 2024, the OIG issued a report calling for legislative changes to increase oversight and enforcement of the statutory cap on hours and earnings for public retirees who return to public service.**

The current version of Section 91 of Chapter 32 of the Massachusetts General Laws, the “return-to-work statute,” establishes hours and earnings limitations for a public retiree who returns to post-retirement employment for the Commonwealth or its subdivisions, including its 351 cities and towns.

Abiding by and enforcing these limits is a challenge. Under Section 91, the formula for an employee’s earnings cap is based on the “salary that is being paid” for the pre-retirement position. Even though that statutory directive seems plain on its face, determining that salary is complicated. For example, salaries change over time, and positions can be eliminated or renamed. That can make it difficult to determine the “salary that is being paid” for the retiree’s former position. As a result of the “salary that is being paid” determinant, each of the Commonwealth’s approximately 238,000 public retirees has a unique post-retirement salary cap that likely changes over time, further complicating the calculation.

Massachusetts has 104 public retirement systems. Yet, the state has no mechanism in place to track retirees from each of these systems who return to public service, nor their hours or earnings limitations. Instead, the system puts the onus on retirees to determine their salary cap and to track their hours.

**The Inspector General has consistently opposed legislative proposals to create exceptions to the Commonwealth’s post-retirement earnings cap.**

In 2023, the Inspector General opposed two bills which would allow holders of specific positions to simultaneously collect a full salary and a full public pension from the Commonwealth.

**To address this complexity, the OIG’s report laid out several recommendations for the Legislature, including:**

- 1. Strengthening the Public Employee Retirement Administration Commission’s (PERAC) role in overseeing and enforcing the earnings cap (or creating a new entity with oversight and enforcement authority);**
- 2. Simplifying the formula used to calculate the earnings cap; and**
- 3. Establishing reporting requirements for public retirees and their employers.**

**In the Fiscal Year 2025 budget, the Legislature established a 13-member task force to examine these issues.**

Section 198 of Chapter 140 of the Acts of 2024 charges the task force with evaluating the process, limits, and controls for post-retirement employment of public employees subject to Section 91. The task force is required to submit a report to the Legislature by June 30, 2025.

# Cannabis Control Commission

In June 2024, Inspector General Shapiro wrote to Senate President Karen Spilka and House Speaker Ron Mariano calling on legislative leadership to appoint a receiver to manage the Cannabis Control Commission’s (CCC) day-to-day functions. The Inspector General also urged legislators to amend the CCC’s enabling statute, Chapter 94G of the Massachusetts General Laws, to put the agency in a better position to effectively regulate the Commonwealth’s cannabis industry.

The Inspector General’s recommendation was based on the OIG’s conclusion that the CCC’s enabling statute is unclear, contradictory, and provides little guidance on the authority and respective responsibilities of the CCC’s chair, commissioners, and executive director. Since May 2022, the CCC has spent more than \$160,000 on mediation services related to a draft governance charter. By the end of 2024, the commissioners had yet to approve the new charter. In the OIG’s view, the CCC’s large revenue stream – \$322 million in tax and non-tax revenue in Fiscal Year 2023 – bolsters the need for action to protect the Commonwealth’s interests in this emerging industry.

The Inspector General later reiterated his call for a receiver in his testimony before the Joint Committee on Cannabis Policy. Following his testimony, the Joint Committee announced that it would revisit the CCC’s enabling statute. The committee held two public hearings in the fall of 2024, taking testimony from industry stakeholders, researchers, and policymakers.

**“As I have said publicly and repeatedly, this is not about specific individuals. It is about a statute that is inconsistent because it assigns the same authority to two positions – the Chair and the Executive Director. Thus, without any change to the statute, I believe the next leaders – Chairs, Commissioners, Executive Directors – may not have any greater success.”**

**-IG Jeffrey Shapiro**



# Legislative Bill Reviews

The **OIG's Government Outreach and Public Policy Division** regularly reviews proposed legislation and provides input to bill sponsors or committee members on issues relevant to the **OIG's oversight responsibilities**.

In 2024 the Inspector General testified before the Legislature on bills related to procurement at the municipal level.

## Municipal Empowerment Act

Inspector General Shapiro testified before the Joint Committee on Municipalities and Regional Government on Senate 2571, *An Act Empowering Municipalities and Regional Governments*. The bill included language the Inspector General recommended to simplify the process for municipalities for procuring electric school buses and charging infrastructure. Moreover, the Inspector General supported raising the municipal procurement pricing thresholds to \$100,000 for consistency with the thresholds for school districts in Chapter 30B of the Massachusetts General Laws.

The Inspector General cautioned against a section in the bill that expanded exceptions to the post-retirement employment options for municipalities.

Senate 2571 was reported out favorably by the Joint Committee on Municipalities and Regional Governments. The committee's version of the bill removed the proposal for post-retirement exceptions. The bill did not advance in the remainder of the legislative session.

## Electric Vehicle Procurement

Although *An Act Empowering Municipalities and Regional Governments* did not advance, the Inspector General's recommendation that the state simplify the process for procuring electric buses and their charging infrastructure was adopted in Section 34 of Chapter 239 of the Acts of 2024. Codified at Section 23 of Chapter 30B of the Massachusetts General Laws, the Legislature created a new streamlined option for procuring electric vehicles and installing the charging infrastructure. Prior to this important change, municipalities would need to procure an electric vehicle as a supply and the necessary charging infrastructure as a construction project, utilizing two different processes having different objectives, rules, and deadlines to acquire interrelated products. The legislation maintains open and competitive procurements for goods and services while ensuring compliance with procurement regulations and laws.



# Proposed Legislation

In November 2024, the OIG filed several bills for consideration during the 2025 – 2026 legislative session.



**House 12, *An Act Updating Chapter 30B***, would equalize the price thresholds in the Uniform Procurement Act. Currently,

based on a recent change in the law, school districts are permitted to seek three written quotations for procurements under \$100,000. This bill would allow the same threshold and practice to occur for municipal government. House 12 also would increase the sound business practice threshold to \$15,000 and allow the use of a request for proposals for procurements of \$100,000 or less. As of the date of this report, House 12 is before the Joint Committee on State Administration and Regulatory Oversight.



**House 13, *An Act Relative to Snow Hauling and Removal***, would add snow hauling and snow removal services to Chapter 30B's current exemption for snow plowing. As of the date of this report, House 13 is

before the Joint Committee on State Administration and Regulatory Oversight.



**House 15, *An Act Relative to Retail Electricity Suppliers***, would strengthen the enforcement mechanisms and bolster surety requirements for retail electricity

suppliers (RES). The OIG reviewed RES programs and found that enforcement gaps in the programs prevented the Commonwealth from recouping millions of dollars that suppliers owed to the state. As of the date of this report, House 15 is before the Joint Committee on Telecommunications, Utilities and Energy.



**House 16, *An Act Relative to County Land Disposition***, would clarify the process that county governments must take when disposing of real property.

House 16 would require county governments to offer, in writing, surplus property to the Division of Capital Asset

Management and Maintenance, which would then inquire whether other state agencies have use for the property. As of the date of this report, House 16 is before the Joint Committee on Municipalities and Regional Government.



**House 17, *An Act Creating the Office of the Inspector General Recovery Fund***, would create a non-budgeted special revenue fund under Chapter 29 and

would replace the OIG's current expendable trust fund. The OIG's expendable trust was created in 2014 and can only be used for temporary purposes. A permanent trust, administered by the OIG, would receive funds from civil recoveries or investigatory costs in the same manner as the expendable trust. The OIG would have the discretion to expend funds for operational, administrative, and investigatory purposes. As of the date of this report, House 17 is before the Joint Committee on State Administration and Regulatory Oversight.

**Inspector General Shapiro testifying before lawmakers on proposed legislation.**



# Other Statutory Work

## | Year At A Glance

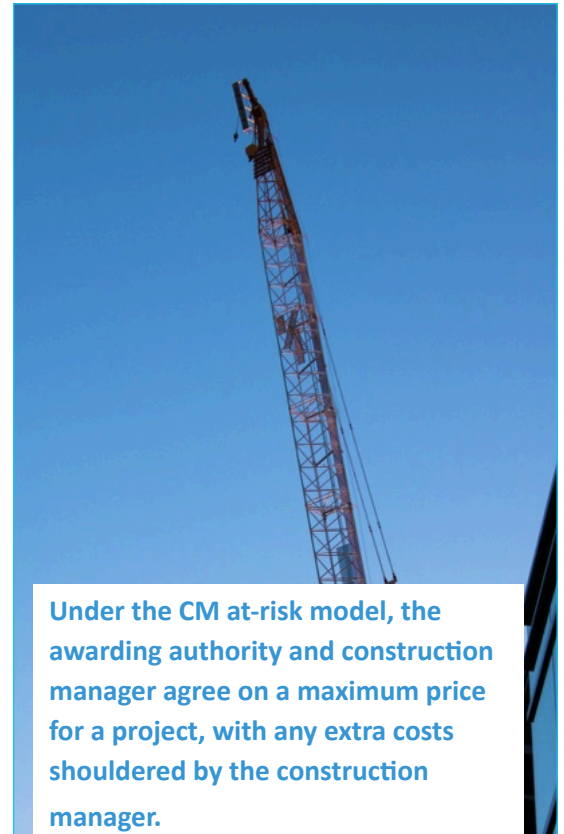
- Issued approvals for public entities to use the public construction management at-risk delivery method in projects with estimated costs of over \$2.5 billion

# Public Construction

Under the authority of Chapter 149A of the Massachusetts General Laws, the Office of the Inspector General (OIG) approves the use of the construction management (CM) at-risk delivery method for public projects. Under the CM at-risk model, the awarding authority for a construction project hires a construction manager and agrees on a maximum price for the project, with any costs exceeding that price shouldered by the construction manager.<sup>3</sup>

**In 2024, the OIG received and approved 21 CM at-risk applications, representing over \$2.5 billion in estimated project costs.**

The projects and their applicants are described in the chart below.



Applicant	Project Description	Project Type	Location
Pioneer Charter School of Science	Pioneer Charter School of Science II (K – 8)	School	Peabody
South Shore Vocational Technical School District	South Shore Regional Vocational Technical High School	School	Hanover
Town of Nantucket	Nantucket Skilled Nursing Facility	Municipal Nursing Facility	Nantucket
Town of Belchertown <sup>4</sup>	Jabish Brook Middle School	School	Belchertown
Lowell Community Charter Public School	Lowell Community Charter Public School Athletic and Arts Facility	School	Lowell
Williamstown Fire District	Williamstown Fire Station	Fire Station	Williamstown
Town of Canton	William H. Galvin Middle School	School	Canton
Town of Billerica	Billerica Recreation Center	Recreation Center	Billerica
City of Gloucester	Water Pollution Control Facility	Water and Sewer Facility	Gloucester

Applicant	Project Description	Project Type	Location
City of Quincy	Squantum Elementary School	School	Quincy
Massachusetts Convention Center Authority	Hynes Convention Center Deferred Maintenance and Code Compliance	Convention Center	Boston
Town of Edgartown	Edgartown Fire Station	Fire Station	Edgartown
Barnstable Fire District	Barnstable Fire Station	Fire Station	Barnstable
Town of Lexington	Lexington High School	School	Lexington
Town of North Attleborough	North Attleborough High School	School	North Attleborough
City of Boston	North End Community Center	Municipal Building	Boston
Town of Shrewsbury	Department of Public Works Facility	Municipal Building	Shrewsbury
Hamilton-Wenham Regional School District	Hamilton-Wenham Elementary School	School	Hamilton
Town of Wilmington	Wildwood Elementary School	School	Wilmington
City of Beverly	Beverly City Hall	Municipal Building	Beverly
City of Medford	Medford Public Schools HVAC Updates	School	Medford

In 2024, the OIG created and implemented a new electronic report form for approved CM at-risk projects. The OIG now requests that jurisdictions submit project milestone information in real time. Additionally, jurisdictions must submit a final report upon the project’s completion. This information will keep the OIG apprised of a project through completion and will assist the OIG in its evaluation of the CM at-risk delivery method.



The town of Nantucket was one of 21 applicants for a CM at-risk project in 2024.

# Real Property

The OIG reviews a variety of real property transactions involving public property, including dispositions, acquisitions, and long-term leases to ensure the public’s interests are protected. The Legislature often requires the OIG to review and approve of appraisal methodologies as a condition of special legislation for the sale or lease of public land.

**In 2024, the OIG reviewed and approved three appraisals related to the disposition or lease of public properties.**

Recipient	Disposition Type	Size of Parcel	Location
Private Party (Maritimes & Northeast Pipeline, LLC)	Utility easement	5,266 square feet of easement on 6.4 acres of open space	Peabody
Private Party (Kennedy’s Irish Pub, Inc.)	Conveyance for beautification and parking purposes	5,484 square feet of land	Marlborough
Nonprofit Organization (The Esplanade Association)	Lease for construction and operation of a visitor center and pavilion	1.9 acres of land	Boston

## Asset Management Board

One of the mandated responsibilities of the Inspector General is to serve as a member of the Asset Management Board (AMB), a five-member board tasked with reviewing and approving the procurement or disposition of real property on behalf of the Commonwealth via alternative methods. The AMB is authorized by statute to waive certain statutory requirements to allow for such procurements or dispositions. The AMB is made up of the Inspector General and Secretary of Administration and Finance, who serve as *ex officio* members, along with three additional members of the public who are appointed by the governor.

Near the close of 2024, the AMB began the review process for three major project proposals: (1) the redevelopment of the Hurley-Lindemann buildings in Government Center; (2) the construction of a new courthouse in Springfield; and (3) the construction of a new courthouse in South Boston. The courthouse construction projects were carefully scrutinized, as both proposals were structured as long-term leases. Inspector General Shapiro has had growing concerns regarding the Commonwealth’s use of long-term leases for several reasons, many of which arose during the OIG’s review of the Commonwealth’s 20-year lease of the Star Store in New Bedford. Drawing on the OIG’s 2024 Star Store report, Inspector General Shapiro ultimately voted against the Springfield project at an AMB meeting in January 2025, citing his concern that the lease could not be competitively procured.

# Health and Human Services Program Reviews

## | Year At A Glance

The Bureau of Program Integrity (BPI), a statutory unit within the OIG, has a legislative mandate specific to programs administered by the Executive Office of Health and Human Services (EHS) and its eleven agencies. BPI makes recommendations based on reviews and investigations and then assists agencies with implementing those recommendations. BPI also has an ongoing statutory obligation to coordinate with the Program Integrity Division of EHS's Department of Transitional Assistance and to consult with DTA regarding eligibility processes and fraud detection. In 2024, BPI:

- Advocated for EHS's development of a secretariat-wide compliance program
- Worked with the Department of Transitional Assistance, the Department of Developmental Services, the Department of Mental Health, and the Department of Public Health to improve program integrity and vendor management

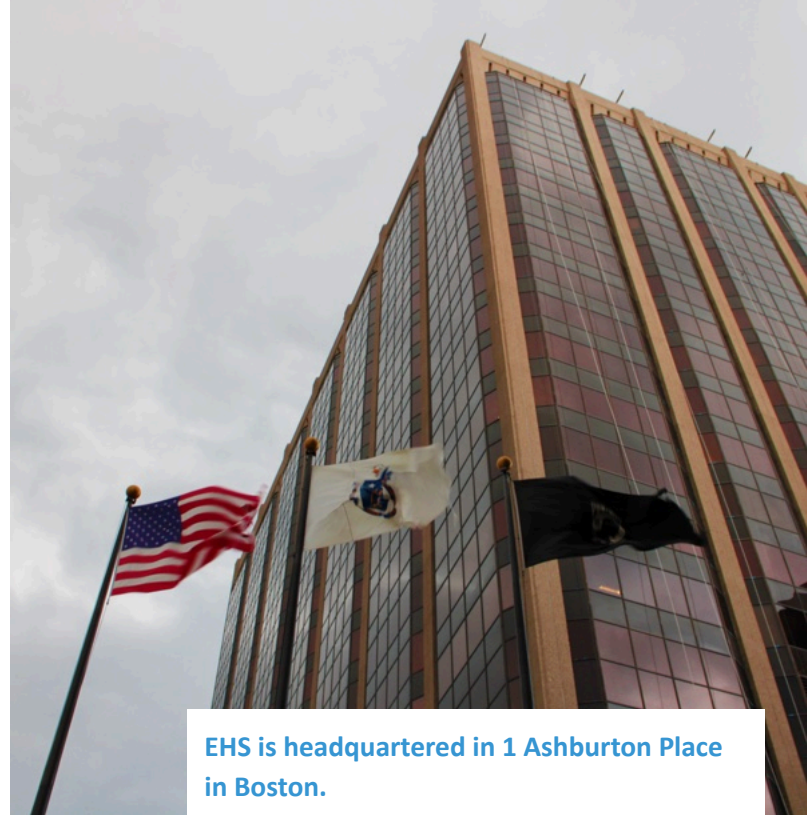
# Executive Office of Health and Human Services

Throughout the year, Inspector General Shapiro and BPI communicated regularly with the EHS secretary and the EHS leadership team and provided recommendations to support EHS’s development of its compliance program. Based on the OIG’s recommendations, in January 2024, EHS hired its first Chief Compliance Officer and Deputy Chief Compliance Officer.

**With the strong support of Secretary Walsh, the EHS compliance team created a secretariat-wide program to conduct compliance-related activities and monitor and support the individual agencies’ compliance work.**

In August 2024, BPI evaluated EHS’s response to recommendations about EHS’s pandemic relief oversight and laid out additional vendor oversight and risk-assessment work for the secretariat. BPI summarized the steps EHS took to monitor pandemic relief spending for home and community based services (HCBS) programs and outlined how EHS could build on lessons learned from this work in other areas of vendor management.

This work stemmed from BPI’s review of EHS’s administration of pandemic relief funds, with a particular focus on HCBS programs. EHS distributed over \$1 billion in pandemic dollars to HCBS vendors in Fiscal Year 2022 through a 10% rate increase to existing contracts to recruit and retain direct care staff. In 2023, the OIG had recommended that EHS take immediate steps to improve its program oversight. At that time, the OIG found – and conveyed to EHS – that EHS needed to track this spending to ensure that vendors used these funds for their intended purpose.



EHS is headquartered in 1 Ashburton Place in Boston.

**The OIG observed that, initially, EHS failed to implement strong controls to monitor vendors’ spending or mitigate the risks involved in spending the large infusion of pandemic relief funds.**

In early 2024, the EHS compliance team took responsibility for leading this oversight work on behalf of EHS and created an EHS interagency workgroup to address the OIG’s 2023 recommendations. This interagency workgroup developed processes to review HCBS spending, shared information about best practices for workforce hiring and retention, and identified unique vendor spending that met programmatic needs. BPI worked with the EHS compliance team and EHS agencies to identify potential vulnerabilities and assist with prevention and mitigation efforts. In August 2024, BPI recognized the steps EHS had taken to improve oversight of pandemic relief funds for the HCBS program.

**Maintaining stable and high-quality direct care staffing is an ongoing challenge that has a significant impact on HCBS programs and many other programs across EHS. As a result, BPI recommended that EHS:**

- 1. Continue to focus on building, stabilizing, and improving the workforce for the long-term quality, integrity, and efficiency of EHS programs; and**
- 2. Identify best practices that emerged from the enhanced recruitment and retention spending on the HCBS program during the pandemic era and apply them more broadly.**

The EHS compliance team also continued to develop and implement a secretariat-wide compliance plan, which identified priority areas of action for EHS agencies: (1) take a systemic approach to vendor management and contract oversight, focusing on program sustainability, cost efficiency, and high-quality services; (2) conduct risk assessments, particularly in the areas of vendor oversight and contract management; and (3) use data-driven approaches to monitor performance management and mitigate noncompliance.

**BPI observed that during 2024 EHS effectively responded to several OIG recommendations related to vendors that provide services to multiple agencies, managing health and safety risks across agencies and coordinating efforts to avoid unnecessary duplication between agencies.**

Throughout 2024, BPI also worked with the EHS compliance team to improve EHS's communication with the Disabled Persons Protection Commission (DPPC). EHS is now working with DPPC and the EHS agencies to create a system of mutual data sharing that will help DPPC more effectively triage and manage allegations of abuse and neglect. This collaboration will help EHS and

its agencies provide protective services, conduct more thorough investigations, and oversee their vendors.

**As a result of this work, EHS also incorporated quality and safety oversight into its secretariat-wide compliance plan, specifically emphasizing the importance of using DPPC information to identify and prioritize high-risk allegations and patterns of conduct.**

On BPI's recommendation, the EHS compliance program has also started to oversee the monitoring of payroll risks within EHS agencies and has created a path for receiving allegations of fraud, waste, or abuse of time by state employees within its secretariat. BPI has periodically received complaints concerning the misuse of time at several facilities operated by EHS agencies.

**With guidance and recommendations from BPI, EHS has taken a more proactive role in responding to payroll risks within its agencies.**

For instance, the EHS compliance program is working with EHS's human resources department to refine the standard time reports that EHS circulates to its agencies to ensure that they are receiving timely, relevant information about their workforce's overtime, excessive hours, and other timekeeping practices.

# Department of Transitional Assistance



The Department of Transitional Assistance (DTA) helps low-income residents of the Commonwealth meet their basic needs and achieve long-term economic self-sufficiency. For eligible individuals and families, DTA administers public benefit programs that provide economic assistance, including the Emergency Aid to the Elderly Disabled and Children (EAEDC) and the Transitional Aid to Families with Dependent Children (TAFDC) programs. DTA also administers food assistance through the Supplemental Nutrition Assistance Program (SNAP).

## Program Integrity

Consistent with its statutory obligations to coordinate with DTA's program integrity division and to consult on fraud prevention, BPI meets with DTA on a biweekly basis. BPI works with DTA to identify and investigate a variety of fraud schemes. BPI then recommends improved controls to mitigate the risks from these schemes.

**In 2024, with BPI's support, DTA implemented new fraud prevention controls, including tools to run identity and background checks.**



### EBT Skimming

Electronic Benefit Transfer (EBT) skimming has been increasingly commonplace and resulted in significant losses for recipients and the state. In 2024, BPI worked with DTA to enhance its efforts to combat this problem. DTA has executed a seven-year, \$20.7 million contract for EBT services with a new vendor. EBT services include administering EBT cards, maintaining the retailer payment system, networking with banks, collecting and storing data on food purchase transactions, and assisting with the detection of fraud, waste, and abuse. In its new contract, DTA incorporated BPI's recommendations related to EBT services, including accountability measures and quality management. DTA also included fraud prevention and detection measures throughout this contract, which should allow for more sophisticated data analysis and real-time responses to suspected fraud. DTA anticipates completing its transition to this vendor in April 2025. Once DTA has completed its transition to the new EBT vendor, BPI will monitor as DTA carries out BPI's remaining recommendations, such as ensuring that the vendor delivers the contractually required programs and tools in a way that meets DTA's expectations.



### Out-of-State SNAP Transactions

BPI also continued to monitor DTA's response to out-of-state SNAP transactions. Federal rules allow recipients of SNAP benefits to use those benefits in other states with certain limitations. Because the interplay of federal and state rules related to SNAP benefits creates a risk of misuse, at BPI's recommendation, DTA completed a quality review of how it monitors out-of-state transactions. DTA identified important areas for improvement in its automated processes, which BPI will track moving forward.



**DTA's office in Framingham is one of the many locations the department has across the state.**

## Intake and Eligibility

BPI also works with DTA to review and improve the intake process and the eligibility review process. In November and December of 2023 and October and December of 2024, BPI visited eight local DTA offices to review the department's intake and eligibility processes, DTA's practices for processing SNAP applications, and how DTA has adjusted SNAP intake processes to the post-COVID hybrid work environment.

In April 2024, BPI made recommendations to DTA based on observations from BPI's 2023 local office visits. Overall, BPI found that DTA was at a turning point in its transition from COVID-era policies and procedures.

**To better meet program needs with the hybrid work model that has carried forward from the COVID era, BPI recommended that DTA improve its technical support and operations planning. BPI also found that it would benefit DTA to train new employees and experienced staff in the fundamentals of case management and provide case managers and supervisors with a firm understanding of their roles, along with the roles of investigators, in promoting program integrity.**

**In response to BPI's recommendations, DTA resolved many hybrid-support issues and ended many COVID-era policies.**

The department took significant steps toward improving supervision, performance management, and staff retention. DTA offered training for new supervisors and improved its training for new SNAP case managers. DTA announced plans to release a new performance management tool in early 2025 to support supervisors as they mentor case managers. DTA also outlined plans to continuously improve training materials for staff.

In December 2024, BPI made additional recommendations based on BPI's 2024 local office visits. During the 2024 visits, BPI focused on DTA's practices for

SNAP intake and eligibility determination processes. After observing and consulting with SNAP case managers in four local offices, BPI found that DTA could improve SNAP case manager onboarding and training, as well as SNAP eligibility processing and client support. BPI heard from staff about ways DTA could improve the SNAP application. In response to BPI's recommendations in these areas, DTA outlined its action plans and took some immediate steps to improve training, supervision, and performance management. DTA also indicated that it would consider options for system enhancements to streamline application interviews and eligibility processes.

Throughout 2024, BPI engaged with DTA on the launch of OneDTA, a single benefits application for all DTA programs designed to improve the intake process. The goal of OneDTA is to improve case management, client-centered services, and staff efficiency. Despite setting several implementation dates during 2024, DTA had not implemented OneDTA as of the issuance of this report. DTA projects that implementation will occur in the summer of 2025.

## Data Quality Management

SSN

### Missing Social Security Numbers

Throughout 2024, BPI tracked DTA's progress in implementing BPI's 2023 recommendations to reduce the instances of missing Social Security numbers (SSN) in DTA's eligibility databases. In 2023, BPI and DTA had worked collaboratively to reduce the number of recipients with missing SSNs in DTA's eligibility database. These recipients were assigned temporary nine-digit identification numbers as placeholders. Temporary identifiers create vulnerabilities that undermine the quality of the data that DTA uses and shares with other agencies. They increase the risks that DTA will create duplicate profiles, will be unable to verify information, or will approve benefits for ineligible applicants.

BPI made a number of short-term and long-term recommendations to improve the data quality. In response, in 2024, DTA implemented an immediate manual cleanup effort and created a dashboard to track its progress, reducing the overall number of client profiles with temporary identifiers. DTA has not yet fully implemented the necessary long-term fixes such as using updated or enhanced fields and functionality relating to SSNs in the eligibility database. In 2025, DTA plans to retrain case managers and supervisors on policies, procedures, and data entry related to SSNs.



### Duplicate Profiles

In addition to the work on temporary identifiers, BPI worked with DTA to address duplicate profiles in its eligibility database. Duplicate profiles undermine DTA's data integrity and create the risk of overpayments and overcounting household members. BPI and DTA agreed on several ways to address the duplicate profiles that are currently in DTA's database and prevent future occurrences. At BPI's recommendation, DTA conducted a manual cleanup of the identified duplicate profiles and started producing and reviewing data reports to detect duplicate profiles in real time.

## Secure Jobs Program

DTA's Secure Jobs program, funded with a \$5 million appropriation in 2024, is designed to deliver flexible, individualized support to help families obtain long-term employment and economic stability. The use of "flexible funds" is a hallmark of the program, which providers can use to address program participants' unique needs, such as transportation costs to travel to work or expenses for an employment training program.

**In February 2024, BPI recommended that DTA take several measures to improve its oversight and providers' administration of the Secure Jobs program:**

- 1. Implement the audit and monitoring clauses in providers' contracts;**
- 2. Require the creation of consistent provider handbooks, policies, and procedures;**
- 3. Update data collection methods;**
- 4. Develop a list of permissible uses of program funds;**
- 5. Formulate guidelines for external partners;**
- 6. Create a co-case management model; and**
- 7. Provide DTA contact information for reporting fraud, waste, and abuse.**

**In response, DTA implemented many of BPI's recommendations, including requiring providers to create updated manuals.**

DTA updated its data collection mechanisms and created a co-case management system for Secure Jobs participants who receive other DTA benefits. DTA plans to transition its data collection for the Secure Jobs program to a new platform in 2025.

# Department of Developmental Services



The Department of Developmental Services (DDS) builds opportunities for individuals with intellectual and developmental disabilities to meaningfully participate in their communities. DDS administers community-based residential programs, including group homes and other shared residences, with the assistance of nonprofit human services vendors that receive state and federal funds.

## Leadership Changes

DDS experienced leadership changes in 2024, including the departure of the commissioner and members of her leadership staff.

**Addressing the agency’s leadership structure, in September, the OIG advised DDS that its central office needs to build capacity in several essential areas, including governance, fiscal management, quality management, project management, business intelligence, and data analytics.**

The OIG also recommended that DDS centralize its management and several other key functions to reduce the deference that the central office has shown to its regional office management teams in recent years, which has resulted in inconsistent procedures, policies, and results. The OIG further suggested that DDS reconsider its reliance on consultants for key leadership roles and for health monitoring, quality assurance, and risk management. Finally, the OIG reminded EHS that it has consistently recommended that DDS prioritize oversight of its vendors.

## Update on Past Recommendations

In last year’s annual report, the OIG noted that BPI had supported DDS in addressing complaints regarding specific DDS vendors. As part of that support, BPI recommended that DDS focus on vendor oversight and monitoring, policies and procedures, staff training, internal communication, and documentation. BPI also recommended that DDS work more closely with the state’s Disabled Persons Protection Commission (DPPC) and healthcare providers’ professional licensure agencies. During 2024, DDS was making slow progress in implementing BPI’s recommendations. Leadership changes, including the Commissioner’s retirement in August 2024, also slowed DDS’s progress to implement BPI’s recommendations.

Until the appointment of a permanent commissioner, which took place shortly before the issuance of this report, several members of DDS’s leadership – including the commissioner – were working in an “acting” capacity. While DDS is working to restructure its governance and improve and centralize its business functions, the department needs to do significant work to improve its management structure and service oversight. BPI will continue to make recommendations and monitor DDS as it moves toward more permanent structural solutions.

DDS's office in Waltham is one of the locations the division has across the Commonwealth.



## Vendor Management

**Throughout 2024, BPI continued to encourage DDS to take a holistic, proactive approach to its vendor management and to reestablish itself as the principal decision-maker in its relationship with vendors.**

BPI focused its work on vendors providing residential services. DDS spent approximately \$1.6 billion on these vendors in 2024. As DDS vendors continue to grow in size but shrink in number, DDS needs to ensure that vendors are providing high-quality services to recipients. BPI has stressed these concerns to EHS leadership.

In 2024, BPI followed up with DDS about two vendors that in prior years were the subject of medical neglect complaints, as reported in BPI's section of the OIG's 2023 annual report. DDS worked closely with one of the vendors to ensure that it updated its policies and practices to address the medical needs of those in its residential program and to confirm that its practices are consistent with service recipients' rights. DDS also reviewed and monitored this vendor's two medical model homes.

For the second vendor, DDS focused on issues related to the management of client funds but did not conduct a broad review of the consistently high number of abuse and neglect complaints that DPPC received. In February 2024, BPI recommended that DDS evaluate these abuse and neglect complaints by category and location and document its review of routine healthcare services for the service recipients in the vendor's program. The number of abuse and neglect complaints related to this vendor did not significantly decrease through the end of 2024, which is of concern to the OIG.

Throughout 2024, BPI focused much of its efforts with DDS on the importance of strong, consistent, and clear vendor management.

**Going forward, DDS plans to hire a provider compliance manager to oversee a new provider compliance system. The manager will be responsible for gathering and analyzing information about DDS vendors.**

DDS plans to make the aggregated information available to DDS staff in the central and area offices. BPI will continue to work with DDS on strengthening its approach to how it manages all its vendors, identifying vendors that require additional oversight, and providing effective feedback to vendors on how to fulfill their contractual obligations.

## Health and Safety Concerns

BPI encouraged DDS in 2024 to work closely with DPPC to assess and monitor risk of abuse and neglect. DDS has been generally responsive when BPI has identified specific vendors that appear to require additional oversight based on DPPC data.

**DDS has taken steps to use DPPC data to proactively identify vendors with relatively high numbers of abuse and neglect allegations, and is involved in an EHS process to improve data sharing with DPPC.**

Throughout 2024, DDS worked with EHS to monitor whether service recipients were at risk of losing their eligibility for MassHealth coverage. In addition, DDS has started to create a structure to identify and monitor issues relating to health and safety. For example, DDS plans to review healthcare records to determine whether vendors have documented that service recipients have received routine services such as annual physical and dental examinations or have declined to receive such care. DDS has also shifted supervisory responsibility for its medication administration program from the regions to the central office to provide for more consistent oversight and improvement. BPI is monitoring as DDS moves forward with these important initiatives.

## Self-Determination Program

DDS's self-determination program gives its service recipients more control over their lives, particularly in regards to making decisions about services based on their preferences, beliefs, and abilities. In the participant-directed program model, the participant (individually or in consultation with others) directs their services and hires and manages support workers. BPI reviewed revisions that DDS made this year to its regulations governing its self-determination program.

DDS uses a financial management services (FMS) vendor to support the self-determination program by managing payments to providers and reimbursements to participants. In August 2024, DDS executed a contract with a new FMS vendor to handle the program's more than 200,000 yearly financial transactions. The new vendor started providing services in late December 2024. BPI will monitor the new vendor's performance.

# Department of Mental Health



The Department of Mental Health (DMH) connects citizens of the Commonwealth with mental health needs to services that will support them in living and participating fully in their communities. DMH administers community-based residential programs with the assistance of nonprofit human services vendors that receive state and federal funds.

## One area of BPI's collaborative work with DMH in 2024 related to the department's contract administration and vendor management.

In February 2024, the OIG expressed BPI's concerns to DMH about a vendor's fiscal and management practices. In Fiscal Year 2024, that vendor received over \$12 million for DMH programs. The OIG recommended that DMH conduct careful oversight of the vendor to address problems with programs and services, ensure their safe and effective delivery, and work with the vendor to implement corrective actions.



DMH is headquartered in the Lindemann Building in Boston's Government Center.

In April 2024, Inspector General Shapiro communicated directly with the vendor. To improve its overall program administration in coordination with DMH, the OIG recommended that the vendor:

1. **Track and report expenditures;**
2. **Track and report strategies related to recruiting and retaining direct care staff;**
3. **Implement an effective system of internal controls and regular internal reviews to ensure compliance; and**
4. **Maintain effective policies and procedures for emergency planning.**

The OIG communicated regularly with both the vendor and DMH to monitor the implementation of BPI's recommendations. In July, the OIG conveyed to the vendor that its plans to implement the recommendations lacked key details, including action items, milestones, deadlines, roles, and responsibilities. DMH worked with the vendor to develop and oversee a better-defined corrective action plan, and DMH is currently assisting the vendor in developing a detailed plan for internal controls. DMH has made progress with the vendor, but the vendor has been slow to complete its corrective actions. BPI will continue to monitor DMH's oversight of the vendor's corrective actions.

Using its approach with this vendor as a model, BPI recommended that DMH apply similar strategies in monitoring other high-risk vendors and pointed to sources of information that may help DMH determine whether a vendor requires closer monitoring. DMH accordingly created a new contract monitoring team in May 2024 to develop processes to systematically monitor contracts and to identify contracts with performance or compliance concerns requiring follow-up. The team includes compliance and senior staff, as well as representatives from all DMH area offices. In addition, DMH created a provider network specialist position in one of its area offices to assist that management team with contract monitoring processes, including planning meetings with providers and tracking data metrics to measure contract performance.

## Department of Public Health



The Department of Public Health (DPH) promotes and protects health and wellness, prevents injury and disease, works to give children a healthy start, and ensures that food and water supplies are safe. DPH prepares for and responds to a wide range of emergencies and disasters, maintains vital records, collects important health-related data, assesses the quality and safety of healthcare facilities and services, and oversees the integrity and competency of healthcare professions.

With respect to DPH's oversight of healthcare licenses, BPI became aware of a series of complaints that the Board of Registration in Nursing (BORN) had received about a licensed nurse in late 2021 and early 2022. Despite the number of complaints, and despite having received reports from DPPC detailing the nurse's actions and inactions that resulted in significant injury to medically fragile persons with disabilities, BORN's active investigation into the nurse's conduct did not begin until March 2023. Ultimately, the nurse entered into an agreement to surrender her license for 30 days, complete several continuing education requirements, and submit performance evaluations from her current employer. The nurse will remain on probation for no less than two years.

In July 2024, BPI expressed its concerns to BORN regarding the delays in the investigation. BORN took the opportunity to implement a new policy to run quarterly reports on all open matters to identify any cases not progressing in a timely manner. The reports also monitor cases involving patient abuse or neglect, drug diversion, and impaired practice. BORN also made changes to improve its communication with other state agencies and implemented an electronic system for logging and tracking complaints to handle them more expeditiously.

# State Police Oversight

## Year At A Glance

The Division of State Police Oversight (DSPO), a statutory unit within the OIG, has a legislative mandate to monitor the quality, efficiency, and integrity of Massachusetts State Police (MSP) operations, and to prevent and detect fraud, waste, and abuse of public dollars in state police activities.<sup>5</sup> In 2024, the DSPO:

- Assessed the integrity of Highway Safety Programs overtime shifts
- Recommended improvements to MSP policies regarding trooper overtime shifts and funeral escorts
- Monitored MSP policy changes made as a result of accreditation, including policies related to use of force and detainees

Governor Maura Healey named a new leader of the MSP in October 2024, appointing Geoffrey D. Noble, a retired senior member of the New Jersey State Police, as colonel.

Pursuant to the authority granted in police reform legislation passed into law in December 2020, this marked the first time in the history of the MSP that the colonel was appointed from outside the MSP's ranks.<sup>6</sup>

The Inspector General and DSPO Director meet regularly with Col. Noble and his deputy on the DSPO's oversight work. The OIG is encouraged by the tone at the top that Col. Noble has set in his early days at the MSP.

## Review of Highway Safety Programs Overtime Shifts

In 2024, the DSPO completed a review of overtime shifts worked in 2021, using the same methodology it had previously used to review shifts worked in 2016 across the MSP (see the OIG's 2021 Annual Report).<sup>7</sup>

The DSPO also reviewed the shifts with a methodology based on automated vehicle location (AVL), also known as GPS, and compared the results. The DSPO found that for the 2021 shifts troopers were accounted for until the end of their shifts in a marked improvement from 2016. The AVL data showed, however, that in a few instances troopers had periods of time during the middle of a shift when they were not in high visibility areas.

The DSPO shared the results of its new review with MSP leadership along with policy recommendations. The overtime shifts which were the subject of the DSPO's review in 2024 and in past years are part of the MSP's Highway Safety Programs (HSP).



## Comparison of 2016 and 2021 Findings

In 2020 and 2021, the DSPO completed a review of 364 four-hour Click-it-or-Ticket (CIOT) HSP overtime shifts from 2016 (see the OIG's 2020 Annual Report and 2021 Annual Report).<sup>8</sup> The DSPO sought to determine whether overtime abuse occurred in troops other than Troop E.<sup>9</sup> For this review, the DSPO primarily used cruiser radio affiliation data to assess each shift's integrity.

To assess the integrity of the 2016 shifts, the DSPO looked at radio affiliation data generated from the radios of troopers who worked CIOT HSP shifts on their days off, when they had no other overtime shifts or paid details.<sup>10</sup> This approach allowed the DSPO to examine the integrity of the shift in its simplest terms, ostensibly with less radio activity.

**The sample from 2016 included 90 instances where troopers worked an HSP shift on a day off. In 39 of those shifts, the trooper's radio turned off prior to the shift's end, suggesting that the trooper did not complete the shift.**

In those 39 instances, the troopers' radios turned off an average of 54 minutes prior to the end of the four-hour shift. In 14 shifts out of the 39, the radio was turned off over an hour before the shift ended. The length of time between the trooper's radio turning off and the end of each of the 39 shifts ranged from 16 minutes to 2 hours, 44 minutes.<sup>11</sup>

In 2024, the DSPO completed a review of four-hour HSP overtime shifts worked in 2021, also using radio affiliation data. The purpose of this review was to examine the integrity of these overtime shifts as compared to the 2016 shifts.

**The sample in 2021 included 85 instances where troopers worked an HSP shift on a day off. The DSPO found only two shifts where a trooper's radio turned off before the shift ended.**

For one of these shifts, the radio turned off three minutes prior to the shift's end. In the other, the radio turned off four minutes prior to the shift's end.

The MSP's HSP overtime shifts are funded through grants from the Massachusetts Executive Office of Public Safety and Security (EOPSS) and the National Highway Traffic Safety Administration (NHTSA). The funding for these grants requires that all troopers paid under the grants must participate actively in enforcement efforts for the duration of their overtime shift. To demonstrate compliance with this requirement, the MSP monitors and documents trooper contacts with motorists in statistical form and reports this data to EOPSS. Funding from the NHTSA, through EOPSS, is subject to federal audit.

Four-hour HSP overtime shifts are comprised of:



Click-it-or-Ticket shifts, aimed at seatbelt enforcement;



Distracted Driving shifts, aimed at deterring drivers from using their phones or engaging in other distractions while behind the wheel; and



Sustained Traffic Enforcement Patrols, which involve MSP troopers cooperating with local police departments to increase highway safety and prevent motor vehicle-related offenses.

The MSP's orders for all HSP overtime shifts emphasize a goal of deterring crime by providing high visibility law enforcement.

# AVL Systems and Radio Affiliation Data

## AVL Data

Automated vehicle locator (AVL) data provides the most concrete and detailed insight into a trooper's movements and activity. It furnishes, in extraordinary detail, historical date and time information for each trooper's driving location, driving duration, speed, stop locations, and distance traveled.



## Radio Affiliation Data

To assess the integrity of the 2016 shifts, the DSPO looked at radio affiliation data generated from the radios of troopers who worked CIOT HSP shifts.

Troopers drive their cruisers to commute to work assignments. The time a trooper's cruiser radio is on or off should coincide with a trooper's commute to the shift location, their work shift, and their commute home.

For instance, if a trooper worked a four-hour HSP overtime shift from 3:30 p.m. to 7:30 p.m. on their scheduled day off, the cruiser radio should have turned on at or before 3:30 p.m. and turned off at or after 7:30 p.m. – depending on the trooper's commute time.

## Review of 2021 Overtime Shifts Using AVL Data

For the same four-hour HSP shifts from 2021 that it used to assess overtime integrity, the DSPO reviewed troopers' automated vehicle locator (AVL) data to determine troopers' locations throughout their shifts. This allowed the DSPO to examine whether troopers maintained high visibility on roadways in accordance with MSP orders and practices.

As a part of this review, the DSPO also looked at data showing citations troopers issued during their shifts, MSP Daily Administrative Journals (DAJ) documenting all troop activity, and individual trooper activity reports from the overtime shifts. Additionally, the DSPO spoke with members of the MSP's traffic programs section and troop operations officers who coordinate and implement these overtime shifts.

**Of the 370 four-hour shifts reviewed, the DSPO found eight instances where the AVL data revealed that the trooper spent between 22 and 80 minutes stopped at a low visibility location, contrary to MSP orders for HSP shifts.**

The stops flagged by the DSPO during these eight shifts were in locations such as industrial or business parking lots, or on streets or other locations not visible from designated patrolled roads.

The MSP's orders for HSP overtime shifts do not provide any specific guidance regarding breaks during a four-hour CIOT shift. The DSPO found that supervisors had differing understanding of whether breaks were allowed or for how long they were allowed. For those who thought a break was allowed, it was for troopers to use 15 minutes to get a coffee or lunch at the barracks.

**The DSPO recommended that the MSP review the eight shifts to confirm compliance or noncompliance with MSP orders and practices. The DSPO also recommended that the MSP draft written orders clarifying what breaks, if any, are allowed during an HSP overtime shift, the duration of such breaks, and the parameters regarding break locations.**

Shortly before the issuance of this report the MSP added clarifying language about breaks to its HSP overtime orders.

## Internal Controls at Start and End of Overtime Shifts

In 2024, building on its work on overtime integrity, the DSPO began a review of the MSP's order requiring that Officers in Charge (OIC) of HSP overtime shifts physically observe troopers under their command at the start and end of each shift.

**The order requires a roll call at the start of each shift, and a debriefing at the end of each shift.<sup>12</sup> This order was an MSP command effort to mitigate the risk of troopers not working the entirety of a shift.**

During the roll call, the OIC provides all troopers with the particular objectives and focus of the overtime shift.<sup>13</sup> They also ensure that troopers have appropriate activity reports to document their contacts with motorists. At the debriefing, the OICs account for all troopers and collect the documentation forms.

The DSPO analyzed over 600 HSP overtime shifts that troopers worked in May 2021, November 2023, and December 2023. The DSPO used data and records to determine whether OICs complied with the MSP order for physical observation, roll call, and debriefing.

**The DSPO’s initial review did not reveal instances of fraud, waste, or abuse, but the DSPO found inconsistencies among OICs’ application of the order requiring physical observation, roll call, and debriefing.**

**To resolve the inconsistent application of the order, the DSPO recommended that (1) the MSP increase training for all troopers and OICs; (2) the MSP conduct audits of HSP shifts to ensure compliance with the order; and (3) OICs document any instance of noncompliance with the physical observation requirement at the start and end of each HSP overtime shift, as well as with roll call and demobilization briefing requirements, in DAJs and activity reports.**

Full compliance with the physical observation requirements of the order is essential to maintain strict accountability and ensure that troopers work the entirety of the shifts. The MSP is currently working with the DSPO to address these recommendations and potential changes to its HSP overtime orders.

## Funeral Escorts

From time to time, the MSP provides a traffic escort for a funeral.

**In 2024, the DSPO reviewed MSP policies and procedures governing the authorization and operation of funeral escorts. The purpose of the review was to assess the strength of the policies for when escorts are permitted, for whom they are permitted, and when the MSP charges for the escort.**

MSP policy permits funeral escorts without charge to the family for troopers and other persons who fall within the policy’s relationship parameters. A funeral escort is permitted in the following circumstances:

- The line of duty or off-duty death of a trooper;
- The death of an immediate family member of an active trooper (*i.e.*, spouse, child, brother, sister, parent, or parent of spouse);
- The death of a retired trooper; or
- The death of active public safety officers in the line of duty.

MSP policy permits funeral escorts without charge to the family beyond these parameters if an escort is necessary to provide additional security or to ensure the safe and efficient movement of traffic.

Outside of those circumstances, the MSP will provide a funeral escort as a paid detail for processions that travel on state highways or across municipal boundaries. Funeral homes make these requests through the MSP’s individual troop paid detail offices. The costs for a paid detail funeral procession are ultimately borne by the respective family utilizing funeral homes’ services.

Troopers in the MSP’s Motorcycle Unit, comprised of 20 full-time troopers and 9 reserves, perform most funeral escorts, whether the MSP does it without charge or as a paid detail procession. For processions without charge, the unit commander is required to confirm the authorization of a funeral escort request with their commanding officer, and only if there is a sufficient MSP “nexus” for the escort.

The DSPO discussed the MSP’s funeral escort policies with the MSP’s Motorcycle Unit commander, MSP command staff, and representatives of the MSP’s legal team. It also examined funeral escort records from the Motorcycle Unit and payroll data for 108 funeral escorts that the unit’s members performed in 2022 without charge to the family, that is, not including paid detail processions. The DSPO reviewed records showing (1) the name of the deceased; (2) the individual requesting the escort; (3) a description of the deceased’s relationship with the MSP, if any; and (4) logistical information regarding the funeral, such as time and location.

The records showed that 42 of the 108 funeral escorts fit squarely within the limited relationship parameters of the MSP policy for an escort without a charge to the family. Forty-nine did not fall within the relationship parameters, and the records for the remaining 17 were inconclusive.

The DSPO did not find any documentation in the records for the escorts falling outside the MSP’s relationship parameters that showed justification – such as the need for additional security or the efficient flow of traffic – for the escort to have been provided without charge.

**The DSPO recommended that the MSP strengthen its funeral escort policies and practices by adding security and traffic measurement assessments to the approval process for funeral escorts provided without charge to the family that are beyond the MSP’s relationship parameters.**

The MSP is currently working with the DSPO to address these recommendations and potential changes to its funeral escort policies.

## Changes to MSP Policies through Accreditation

**As part of its statutory mandate under Section 73 of Chapter 22C of the Massachusetts General Laws, the DSPO is charged with monitoring the MSP’s efforts to achieve certification or accreditation by a state or national law enforcement accrediting agency.**

The DSPO is also required to monitor policy changes the MSP institutes as a result of these efforts.

The MSP achieved full accreditation through the Massachusetts Police Accreditation Commission (MPAC) on December 21, 2022. Since the MSP attained full



**On February 15, 2024, 75 members of the 89th Recruit Training Troop graduated and joined the MSP’s ranks.**

accreditation, the DSPO has reviewed a multitude of policy changes instituted through the certification and accreditation processes.

For background, the certification or accreditation process for any police organization, regardless of size, generally consists of two major components: (1) establishing administrative and operational standards for the police organization; and (2) assessing the police organization to ensure it meets these standards. This generally entails a top-to-bottom internal review of the organization and, when necessary, revising the organization’s policies and procedures, followed by an external peer review by the certifying or accrediting body.

MPAC is the sole arbiter of state certification and accreditation of police agencies within the Commonwealth.<sup>14</sup> MPAC’s operational and administrative standards reflect national best practices in police management, administration, operations, and support services. MPAC offers two professional credentialing programs: certification and accreditation. Accreditation is the higher of the two program awards. Certification is a significant milestone toward accreditation.<sup>15</sup>

In 2024, the DSPO reviewed MSP post-accreditation policy changes related to use-of-force and detainee policies.

## Use of Force Policy Changes and Training

In 2024, the DSPO analyzed the MSP's training curriculum and lesson plans for current members of the MSP and trainees at the State Police Academy.

The DSPO confirmed that the MSP's curriculum and lesson plans reflected all policy changes regarding the use of force instituted as a result of the MSP's certification and accreditation awards.

### Policies Related to Use of Force

- A requirement that troopers utilize verbal warnings before using force
- A prohibition on the use of chokeholds on detainees
- A prohibition on obstructing the airway or blood flow of detainees
- Limitations on the positioning of detainees in custody
- An obligation to provide medical assistance
- A requirement to terminate force when objectively reasonable
- Instruction and requirements on the use of de-escalation tactics
- A duty to intervene
- A duty to report, with no retaliation

## Detainee Policies

The DSPO also monitored the changes to the MSP's written policies regarding detainees, which include:



Increased protocols and detailed procedures regarding the transport and transfer of detainees



Detailed procedures and requirements regarding search of detainees and custodial inventory of detainee property



Step-by-step instructions for the booking process



Routine 24-hour monitoring and face-to-face checks on detainees every 30 minutes



Protocols regarding suicide threats and prevention



Detailed procedures and guidance regarding medical care, first aid, and medical emergencies



Protocols for transporting, securing, and monitoring detainees at medical facilities



Detailed procedures regarding the release of detainees

The DSPO will continue to work with the MSP to further the DSPO's statutory mandate to monitor policy changes initiated as a result of the MSP's efforts to achieve and maintain certification and accreditation.

# Transportation Oversight

## Year At A Glance

The Internal Special Audit Unit (ISAU), a statutory unit within the OIG, has a legislative mandate to oversee the spending and operations of the Massachusetts Department of Transportation (MassDOT) and the Massachusetts Bay Transportation Authority (MBTA). In 2024, the ISAU:

- Reviewed \$23.2 million in transportation and transit spending
- Published a report reviewing two privatization contracts the MBTA held with vendors supplying customer call center services and called on the MBTA to improve its contract management
- Reviewed leases MassDOT held with a technology vendor, resulting in the return of approximately \$1 million to the Commonwealth in missing rent payments

**In Calendar Year (CY) 2024, the ISAU reviewed MBTA contracts, MassDOT leases, and municipal airport COVID spending, and regularly monitored MassDOT and MBTA operations.**

MassDOT and the MBTA together encompass approximately 12,300 employees, over \$4 billion in combined Fiscal Year (FY) 2025 annual operating spending, and a combined programmed capital spending budget of \$26.3 billion between FY2025 and FY2029.

**The ISAU operates with a FY2025 budget of \$1,235,004 and a staff of 11 employees.**

Through three informational tours with the MassDOT Highway Division, the ISAU also gained insight into the workings of the Highway Operations Center and Central Artery tunnels, as well as the construction of the William Felton “Bill” Russell Bridge, all within the city of Boston.

## Reviews

### MBTA Privatization of Service Review

The “Act Providing for the Delivery of State Services in a Fiscally Responsible Manner” – known as the “Taxpayer Protection Act” (Act) – was signed into law in 1993. The Act requires state agencies and applicable authorities like the MBTA to follow certain procedures before hiring a vendor to perform services valued at \$500,000 or more “which are substantially similar to and in lieu of” services that the state entity provides. Hiring a company to perform services previously administered by public employees is commonly referred to as “privatization.”

In 2015, the Legislature granted the MBTA a three-year exemption from the Act’s requirements, and the MBTA outsourced seven services pursuant to this temporary exemption.<sup>16</sup>



**In July 2024, the ISAU team made a site visit to inspect the construction of the William Felton ‘Bill’ Russell Bridge in Boston, which connects Charlestown to the West End and North End.**

The 2015 legislation also directed the OIG to review all contracts that the MBTA executed pursuant to the exemption and report on each privatized MBTA contract within 90 days of its “complete performance.”<sup>17</sup> The OIG’s evaluation is to specifically assess four areas:

1. **The procurement process;**
2. **The quality of services provided;**
3. **The expected and actual cost of the contract; and**
4. **The actual cost of the contract compared to the benefits derived from it.**

Vendors have completed performance for four of the seven services the MBTA outsourced under the exemption.

In November 2024, the ISAU issued its report on the fourth privatized service and reviewed the MBTA’s completed contracts for customer service call center services. The MBTA traditionally used in-house employees to receive calls, provide fare and service information, and take complaints from MBTA riders. In 2016, in an effort to lower costs and improve customer access to information, complaint resolution, and call center technology, the MBTA decided to transition its call center services to an outside vendor.

The MBTA contracted with two companies to provide call center services: Global Contact Services, LLC (GCS) from June 2017 to June 2018, and Exela Technologies, Inc. (Exela) from June 2018 to May 2024. Following complaints regarding the quality of services under Exela, the MBTA resumed in-house operations of its call center in June 2024.

**The ISAU made several key findings. While privatizing call center services did save money, it failed to achieve the MBTA’s goals of improving (1) customer access to information; (2) complaint resolution; and (3) technology. The ISAU found that the MBTA’s failure to achieve the expected benefits of privatization was due to its ineffective contract management.**

The ISAU found that, while the MBTA’s two procurement processes were generally fair and competitive, the MBTA did not adhere to all of the evaluation criteria set forth in its own requests for proposals. Further, the MBTA awarded the second contract to Exela despite the fact that Exela failed to meet the deadline for bid submissions.

As with its three prior reviews of privatized services, the ISAU identified shortcomings in the MBTA’s vendor management. Both vendors delivered a mixed quality of



customer service, and the ISAU believes that enhanced contract oversight by the MBTA throughout both contract periods could have driven better results. For example, while the GCS and Exela contracts contained detailed, well-developed service level agreements, the MBTA misapplied contract penalties and incentives. The MBTA also paid for a third-party vendor to measure quality of services and then failed to fully utilize its services.

The ISAU found that the actual costs of the call center services contracts were marginally lower than the maximum potential costs of the contracts. Although the costs were lower, the MBTA decided to move call center services back in-house at an estimated annual cost of \$3.37 million, approximately triple the annual cost for services under Exela. According to the MBTA, it made the decision based on the need for quality services to best serve the call center’s users. The OIG observes that the MBTA’s management of the contract specifically with respect to the quality of services fell short of achieving its own goals.

**The OIG encourages the MBTA to adopt and actively engage in contract management practices that ensure that it receives the highest quality services from its vendors.**

For the call center services, the MBTA could have examined other options – such as rebidding the service and improving vendor oversight to achieve better customer service – before bringing the operations back in-house.

## Procurement, Contract Administration, and Vendor Management Improvements

Since October 2022, when the ISAU issued its first report on the MBTA’s privatization efforts undertaken during its exemption period – 2015 to 2018 – from the Taxpayer Protection Act, the ISAU team has provided many recommendations and collaborated with the MBTA’s Procurement and Logistics Department<sup>18</sup> to improve MBTA procurement processes, contract administration, and vendor management.

The MBTA reports that it is committed to continuous improvement in these areas. The ISAU meets quarterly with the MBTA Procurement and Logistics team on its progress.

**In response to the ISAU’s findings in its call center services review, the MBTA stated that during the second contract period, the parties agreed not to measure the performance metric related to data quality. This metric – which Exela failed to meet over the course of its contract – accounted for \$39,000 of the uncollected penalty fees. Further, the MBTA did not enforce a separate performance metric related to customer satisfaction because the parties were not aligned on the metric’s calculation and associated penalty structure. After resolving the metric discrepancies, the MBTA made \$30,000 in incentive payments that it believed were appropriate. The MBTA agreed that it should have amended the contract to address the changes regarding these two metrics and to make clear that the associated incentives and penalties would not be enforced.**





## Recordkeeping

The ISAU has seen an improvement with recordkeeping since the MBTA made a commitment in 2022 to enhance recordkeeping efforts and revamp internal procurement and oversight procedures. The MBTA procurement office developed an electronic contract records filing system for all relevant procurement-related documents.<sup>19</sup>



## Procurement Process

The ISAU has found in its reviews that the MBTA has not consistently advertised its solicitations widely in trade or specialty publications. To increase its reach and promote competition, the MBTA has been advertising in specialty media and trade publications as appropriate.



## Internal Communications

Across the reviews it conducted, the ISAU found that a lack of communication between MBTA business units impacted the quality, efficiency and integrity of procurements. The MBTA has taken steps to increase communications among its business units and particularly when developing specifications for requests for proposals.



## Sole Source Procurements

The ISAU has questioned the MBTA's use of sole source procurements. Over the past year, the procurement team has conveyed its goal to limit the use of sole source procurements and to educate business units on the necessity of publicly advertised procurements for most purchases. The OIG continues to monitor this issue.



## Performance Metrics

As the ISAU has found, the MBTA generally includes performance metrics in contracts to measure vendor performance but has been inconsistent in how it uses and enforces those metrics. An underlying cause of this problem has been that the MBTA had not clearly designated an employee responsible for these tasks on each contract. For contracts valued over \$250,000, during the contract approval and routing process, the MBTA now formally assigns and documents a dedicated contract administrator to oversee performance. The stated goal of this assignment is to reduce uncertainty and make clear to all parties involved which individual MBTA employee is responsible for contract and vendor oversight. The MBTA has also developed a contract administration reference guide for public construction projects that outlines standard actions to be undertaken by the contract administrator when managing these engagements. The OIG continues to monitor this proposed solution for its effectiveness.



## Upcoming Changes

The ISAU is encouraged by the MBTA's Procurement and Logistics Department plans for CY2025, some of which have been accomplished and some that are still in progress. The department's plans address many of the issues that the ISAU has seen in past procurements and contract administration. For instance, the MBTA envisions a new annual outreach process to contact contract administrators who oversee vendors to emphasize the importance of strong vendor oversight, promote the resources available from the Procurement and Logistics Department to assist with vendor management, ensure the use of performance metrics, and require contract administrators to confirm that vendors are indeed fulfilling all requirements within their scope of work. The MBTA also will roll out a "contracts dashboard" to track contract due dates and open purchase orders, and identify those with contract administration duties.

The ISAU looks forward to seeing these improvements implemented and will continue to assist the MBTA in enhancing its procurement, contract administration, and vendor management practices. This work is particularly significant as the MBTA prepares its \$1 billion-plus procurement for a commuter rail operator in 2025. The OIG encourages the MBTA leadership to ensure that staff members understand and implement the OIG’s recommendations for contract management improvements.

## Massachusetts Department of Transportation Technology Leases

The ISAU identified a longstanding MassDOT lessee that held numerous leases, easement agreements, and licenses (collectively referred to as leases) with MassDOT and its legacy agencies (such as the Massachusetts Turnpike Authority and MassHighway) to use state property for telecommunication purposes. Across these leases, the vendor missed numerous rent payments to MassDOT at various times across several years.

The ISAU worked with MassDOT’s Office of Real Estate and Economic Development to determine the outstanding balances that the technology vendor owed. Many of the leases included contract clauses allowing MassDOT to perform comprehensive audits of rent payments at the vendor’s expense if the audits ultimately concluded that the vendor underpaid MassDOT by more than a certain percentage. The ISAU recommended that MassDOT hire outside forensic auditors to perform these audits, which it did.

### In 2024, the vendor paid MassDOT approximately \$1 million for the missed payments.

Relatedly, the ISAU has been tracking the progress of MassDOT’s Office of Real Estate and Economic Development (OREED) in implementing long-needed process improvements to ensure that MassDOT can effectively and efficiently track and monitor long-term leases that OREED manages, ensure payments are timely

and accurate, and provide revenue forecasting and projections. MassDOT has made significant progress in data remediation and implementation of new technology solutions toward this goal. The ISAU will continue to monitor these efforts and work with MassDOT to responsibly manage its large portfolio of long-term public leases, easement agreements, and licenses with vendors that use, or operate on, MassDOT property. The OIG continues to monitor this issue.

## Nantucket Memorial Airport

In October 2024, the ISAU issued a letter to the Nantucket Memorial Airport regarding the ISAU’s review of the airport’s use of COVID-19 grant funding from the Coronavirus Aid, Relief and Economic Security Act (CARES Act), the Airport Coronavirus Response Grant Program – Coronavirus Response and Relief Supplemental Appropriation Act (CRRSA), and the Airport Rescue Grant – American Rescue Plan Act of 2021 (ARPA).

The ISAU team reviewed relevant COVID-19 grant funding guidance from the Federal Aviation Administration (FAA) and conducted multiple meetings with the FAA, MassDOT’s Aeronautics Division, and Nantucket Memorial Airport. The ISAU reviewed grant documents and reimbursement requests that Nantucket provided, as well as grant documents and expenditure data provided by MassDOT’s Aeronautics Division.



The ISAU found that Nantucket Memorial Airport appropriately used \$10,020,437 in federal grant funding.

## The ISAU found that Nantucket airport management expended the \$10,020,437 in COVID-19 grant funding it received in accordance with the FAA’s criteria.

Nantucket’s reimbursement requests under each of the COVID-19 grants were reasonable and complied with FAA expense guidelines. Nantucket also incurred the expenses during the permissible period of performance for each grant.

## Regional and Local Matters

The ISAU investigated a complaint stemming from a regional transit authority’s contract for a new facility. The regional transit authority questioned a change order from the vendor that was far greater than expected. After the ISAU began asking questions, the vendor produced a corrected change order that was 10 times less than it originally submitted.

The ISAU investigated a complaint related to a town’s drainage improvement contract that went more than 100% over the original contract amount. The ISAU found that the town had poor contract administration practices. The town also should have known that the contract could not be informally amended and that extra work needed to be procured under proper procedures.

## Monitoring and Oversight Activities

### Rail Transit System Safety

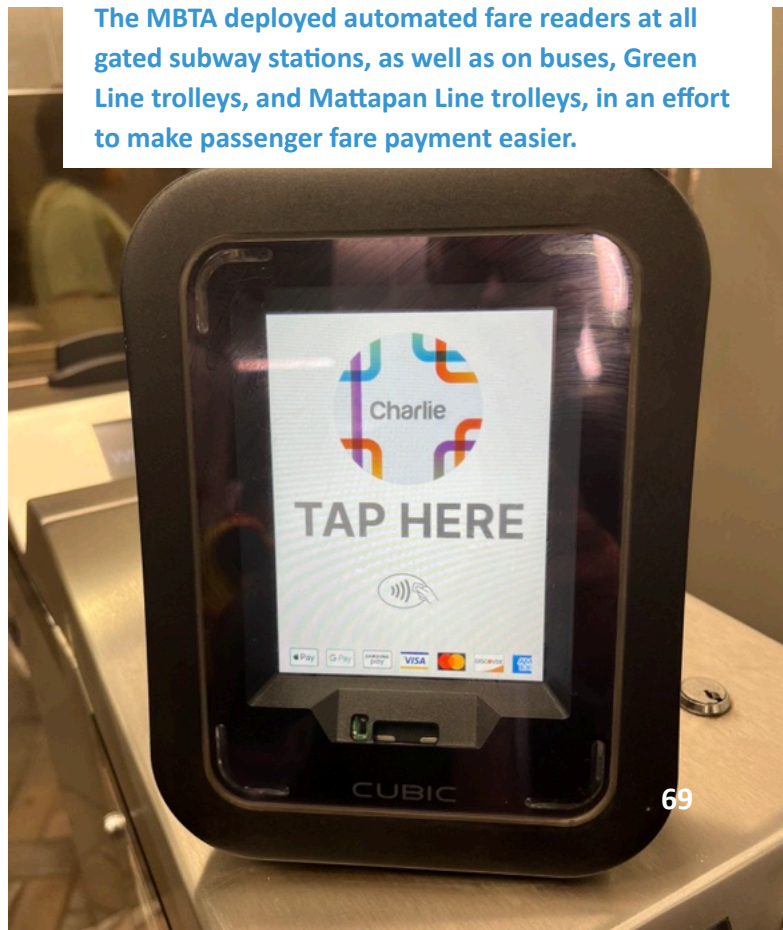
The ISAU monitors the progress of the MBTA and the Department of Public Utilities (DPU) Rail Transit Safety Division (RTSD) (as the state safety oversight agency) in enhancing safety across the MBTA’s rail transit system. The ISAU tracks how the MBTA and RTSD are meeting the recommendations and corrective actions outlined in the

Federal Transit Administration’s (FTA) August 2022 Safety Management Inspection Report. To further this work, the ISAU meets with current and former MBTA and DPU safety staff, reviews MBTA and DPU safety investigation procedures, analyzes investigative reports and data, attends MBTA safety trainings, and monitors FTA acceptance of MBTA and DPU corrective action plans. The ISAU also actively reviews and trends comparable national transit data that the FTA maintains. The OIG continues to evaluate the oversight of the MBTA by the DPU.

## Automated Fare Collection

The ISAU monitored the MBTA’s 2024 rollout of its new fare collection system, referred to as “automated fare collection” or AFC 2.0.<sup>20</sup> The authority has invested nearly \$1 billion in the system. Beginning on August 1, 2024, the MBTA deployed AFC 2.0 on buses, Green Line trolleys, Mattapan Line trolleys, and at all gated subway stations. On multiple days, the ISAU observed actual rider usage of the fare readers throughout the MBTA transit system and provided feedback to MBTA senior management.

The MBTA deployed automated fare readers at all gated subway stations, as well as on buses, Green Line trolleys, and Mattapan Line trolleys, in an effort to make passenger fare payment easier.



**Among other findings, the ISAU determined that on the first day of AFC 2.0’s deployment the vendor had not installed a fare reader at all Green Line vehicle doors.**

This restricted riders’ ability to tap-and-pay with their contactless payment when they entered the vehicle, particularly at back doors. Fifty-four days later, the ISAU confirmed that all Green Line doors it observed had an AFC fare reader for contactless payments. The AFC will be subject to future review.

## **Electric Vehicle Infrastructure**

As part of the Federal Highway Administration’s (FHWA) National Electric Vehicle Infrastructure (NEVI) program,<sup>21</sup> MassDOT is receiving \$63 million from the Bipartisan Infrastructure Law over a five-year period to build electric vehicle (EV) charging infrastructure across the Commonwealth. MassDOT submitted its initial NEVI Plan to FHWA in July 2022, and FHWA approved it for implementation on September 14, 2022. In 2023,

MassDOT solicited vendors for EV charger installation and selected three to support its NEVI Plan.

In 2024, the ISAU met with the Highway Division for an overview of MassDOT’s NEVI Plan, including its efforts to date and its long-term strategy. The ISAU will continue to monitor the Highway Division’s progress, as well as the Commonwealth’s EV charger inventory and all funding received by MassDOT and the MBTA for EV charging.

## **Rail System Maintenance**

Throughout 2024, the ISAU monitored the MBTA’s progress and completion of its Track Improvement Plan.

**This plan, announced by the MBTA in November 2023, was a large-scale track repair and replacement initiative to eliminate nearly 200 speed restrictions.**

## **Heavy Rail Vehicle Procurement**

The ISAU has been monitoring the MBTA’s contract with China Railway Rolling Stock Corporation Massachusetts (CRRC MA)<sup>22</sup> for the replacement of the MBTA’s heavy rail vehicle fleet of Orange and Red Line cars. In 2014, the MBTA entered an agreement with CRRC MA to procure a complete replacement of these fleets.

The original contract, including amendments and exercised options for additional Red Line cars, was expected to take 9 years at a cost of \$870.5 million. Even before the global disruptions caused by the COVID-19 pandemic, CRRC MA had fallen behind on the contract. By 2024, the viability of the contract was seriously in doubt. The MBTA renegotiated the contract with CRRC MA, setting a new final delivery date of December 2027, at a new cost of \$1.018 billion.

The ISAU will continue to monitor the MBTA’s contract management and CRRC MA’s performance through the end of the contract.



The MBTA aimed to bring all tracks into a five-year state of good repair by the end of Calendar Year 2024 and eliminate speed restrictions across the transit system. This was the work that required the MBTA to shut down sections of the transit system on a rolling basis and shuttle riders between stations on buses throughout 2024. The MBTA completed its repair program by its end-of-year completion target. The OIG notes that the MBTA will need to implement track closures on a yearly basis in order to avoid the lengthy closures and slow zones that impacted commuters throughout 2024.

**The OIG believes that to achieve its goals of a strong maintenance program and infrastructure upgrades, including signal systems, bridges, and station accessibility with quality, efficiency, and integrity, the MBTA needs to have, and continuously test, strong systems and controls for its program management, contract and vendor management, time management, and records management.**

By setting expectations high, MBTA leadership can set a tone from the top that oversight and safety are key parts of the long-term transformative strategy for mass public transit. The tone also needs to include

open and transparent communication with the Administration, Legislature, and public about the successes and failures of the maintenance program.

The ISAU continues to monitor the quality, efficiency, and integrity of this work in 2025.

## Fraud Prevention Training

In furtherance of its mission to prevent the misuse of transportation funds, the ISAU continued to train Commonwealth employees on fraud prevention in 2024. For the sixth year in a row, ISAU staff provided fraud prevention training for the MassDOT Highway Division's Construction Management Certification Program. Over two class sessions in February 2024, the training highlighted common fraud schemes, prevention techniques, and red flags for vendor fraud. The training also included a case study on bridge maintenance contracts, with a focus on evaluating contract terms, vendor submittals, and invoices.

Similarly, the ISAU gathered the lessons learned from the first three MBTA contract privatization reviews to create a course for the OIG Academy that highlights best practices in contract administration and vendor oversight. The ISAU trained 80 local, state, and quasi-governmental employees through this course.



**“The MBTA’s track closures in 2024 were a wake-up call about the consequences of deferred maintenance. The Commonwealth needs to commit to – and insist upon – regular maintenance schedules to avoid the costly and disruptive closures and slow zones that were necessary in 2024 to bring the tracks into good repair.”**

**-IG Jeffrey Shapiro**

# Transportation Hotline

The ISAU maintains a “hotline” for members of the public to confidentially report suspected fraud, waste, or abuse in the expenditure of transportation funds. Information on how individuals may submit information via email, telephone, mail, or online form is available on the OIG’s website. The ISAU also maintains employee hotlines on MassDOT’s intranet where the organization’s employees can report wrongdoing or suspected misuse of MassDOT funds.

The ISAU received 332 hotline complaints in 2024, with 124 complaints, or 37.35%, related to disability parking or placards. The remaining hotline tips concerned topics such as employee misconduct or mismanagement, vendor fraud, and MBTA safety concerns.

The ISAU evaluated each complaint to determine whether it fell within the ISAU’s jurisdiction and whether it merited action. Some complaints led to either limited or extensive investigations, while others were redirected to other agencies. The ISAU closed complaints if the preliminary review did not warrant further action on the facts.

In 2024, the ISAU sent 13 matters to MassDOT, the MBTA, and regional transit authorities for further review and

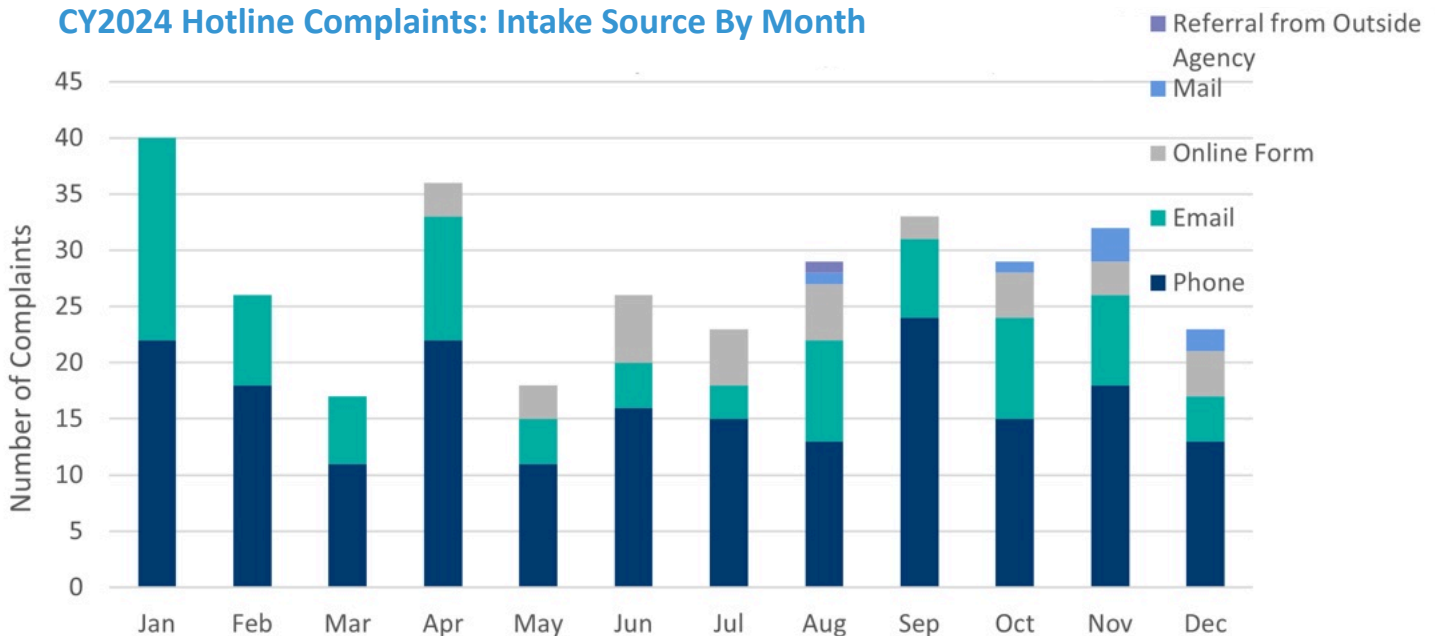


The ISAU team conducts fraud training for MassDOT employees in Hopkinton.

possible corrective action on topics as diverse as vendor mismanagement and personnel matters. ISAU staff also worked collaboratively with MassDOT and the MBTA to resolve other inquiries.

The ISAU does not publicly report on matters that did not result in a letter or report. When appropriate, the ISAU will use lessons learned from an investigation to develop trainings or OIG Advisories on best practices for contract management and fraud prevention. Even cases that do not result in public letters or reports provide valuable insight on how government agencies can operate better to prevent and detect fraud, waste, and abuse, as long as the lessons are communicated.

CY2024 Hotline Complaints: Intake Source By Month



# Education and Outreach

## | Year At A Glance

- 2,042 students registered for 100 OIG Academy classes, comprised of 6 core classes and 27 electives on specialized topics
- 533 individuals earned or renewed Massachusetts Certified Public Purchasing Official Designations
- 135 Massachusetts municipalities participated in the OIG Academy's "One Free Designee" pilot program



# The OIG Academy

In 2024, the OIG continued to educate state and local government employees, procurement professionals, and private individuals on good governance, public purchasing laws, contract administration, fraud prevention, and other topics.

The OIG’s educational and technical assistance arm, the Learning and Development (L&D) Division,<sup>23</sup> supports Inspector General Shapiro’s vision that education serves as a primary vehicle to prevent fraud, waste, and abuse of public resources.

Through its training programs, the L&D Division’s OIG Academy equips participants with the tools they need to safeguard public resources. Training sessions are also designed to support students in maintaining a variety of licenses and certifications through continuing education and professional development opportunities.

To meet the diverse needs of its students, in 2024 the OIG Academy offered 100 class sessions, 46 of which were core classes and the rest of which were electives on introductory and advanced topics.

**33**  
unique classes

**6**  
core classes and  
**27**  
specialized electives

Classes ranging  
from  
**1 hour**  
to  
**4 days**

**2,042**  
registrants

**“I believe that increasing the number of new Massachusetts Certified Public Purchasing Official (MCPPO) designees is core to the mission of the OIG to prevent fraud, waste, and abuse of public resources. The MCPPO designation provides public employees with a better understanding of the complexities of Massachusetts procurement law and best practices. This foundational knowledge increases the proficiency of public employees tasked with procuring goods and services. I am doing everything I can to remove barriers to training and to position the Office of the Inspector General as a resource and a partner in good government.”**

**-IG Jeffrey Shapiro**



The Massachusetts Certified Public Purchasing Official (MCPPO) Designation remains a centerpiece of the Academy. A student earns the widely recognized MCPPO Designation upon completing three foundational procurement courses. The OIG also offers the School Project Designers and Owner’s Project Managers Certification.



The Academy has brought back in-person learning opportunities in its classroom at 1 Ashburton Place in Boston.



### Live and virtual classes

At the start of the COVID-19 pandemic, the Academy transitioned to a completely remote learning environment. Remote learning has remained popular, and the Academy continues to provide both live and self-paced virtual options. The Academy has brought back in-person learning opportunities in its classroom at 1 Ashburton Place in Boston. Inspector General Shapiro is committed to providing learning opportunities that meet the needs of adult learners.



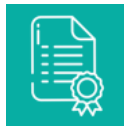
### Learning Management System

The L&D Division realized a major accomplishment in 2024 through its adoption of the *Anthology* Learning Management System, a tool that allows students to easily navigate the Academy’s course catalog and select, register, and pay for courses. Students may also enter the Academy’s virtual learning environment, *Blackboard Learn*, from the *Anthology* dashboard. *Blackboard Learn* offers a high-quality gateway for live and self-paced courses and associated resources. Students can also easily communicate with Academy instructors through the Learning Management System.



### Instructor communication

The Academy provides a dedicated email address – “Ask-the-OIG-Instructor@mass.gov” – where students can pose questions to instructors both during and after classes. Additionally, the Academy’s telephone and email helpline is available to entertain questions on enrollment, payment, scheduling, or technical concerns. The Academy also offers advisory services for current or potential students who need help choosing appropriate classes or who wish to learn more about the MCPPO Designation.



### Academy accreditations

The Academy maintains accreditations from the American Institute of Architects, the Massachusetts Fire Service Commission, and the Massachusetts Department of Environmental Protection.



### Outside speaking engagements

In addition to teaching classes, the L&D Division continued to accommodate speaking requests from a broad range of governmental jurisdictions. In 2024, the division made both virtual and in-person presentations on a variety of topics, such as fraud prevention, procurement practices, and effective governance.

# The MCPPO Designation

A core function of the OIG Academy is to educate those involved with public procurements. An MCPPO Designation signifies that the holder achieved a comprehensive understanding of Massachusetts public purchasing laws, practices, and principles.

**533 individuals earned or renewed their MCPPO Designation in 2024.**

**To earn an MCPPO Designation, a student must complete three classes:**



## Public Contracting Overview

An introduction to Massachusetts procurement laws



## Supplies and Services Contracting

Provides a more in-depth review of the Uniform Procurement Act (Chapter 30B of the Massachusetts General Laws).



## Design and Construction Contracting

Covers Massachusetts public design and construction laws.

Candidates for the credential must also pass competency assessments related to procurement best practices. To stay current, holders of an MCPPO Designation must earn continuing education credits annually and renew their Designation every three years.

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

**-Karla Koza,  
the OIG Academy’s Director of  
Learning and Development**



# 'One Free Designee' Program

The OIG Academy and the staff who support the OIG's educational functions are funded by a retained revenue account, meaning that the program is paid for by collected tuition rather than through a legislative appropriation in the state budget. Based on information that state and municipal officials shared with Inspector General Shapiro, it was clear that the cost for the MCPPO three-course series was a barrier preventing some communities from enrolling. Inspector General Shapiro created the "One Free Designee" (OFD) Pilot Program in 2023 to respond to this challenge.

**Under the OFD Program, every city and town is eligible to select one employee to take the classes needed to earn the MCPPO Designation with the cost of the program absorbed by the OIG. That amounts to a savings of \$1,885 for each participating community.**

The OIG also assumes the costs associated with all Designation applications and renewals.

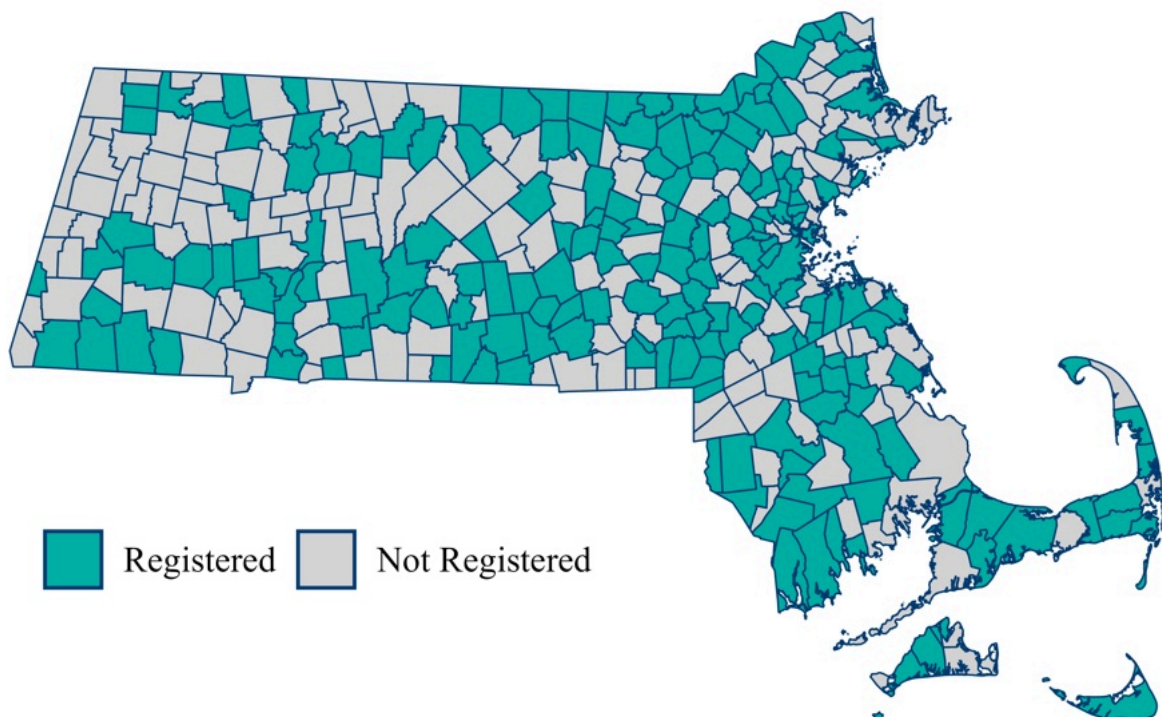
In 2024, 135 Massachusetts municipalities participated in the OFD Program.

**Since the program's inception, 55.5% of the Commonwealth's municipalities have enrolled an employee to take the courses necessary to earn the MCPPO Designation.**

To take advantage of the OFD Program, a chief municipal officer, such as a mayor, manager, administrator, or select board chair, simply completes an online form identifying the employee to receive the training and acknowledging that the cost of the training is a factor in obtaining the Designation.

The OFD pilot program is set to expire on June 30, 2025.

OFD Registered Municipalities as of the End of 2024



# Partnerships

The OIG Academy is proud to work with many state and local partners who enhance the Academy’s training curriculum. In 2024, the Academy continued its work with the Massachusetts Attorney General’s Office and the Department of Labor Standards (DLS) to educate public employees on construction bidding laws. The UMass Building Authority, the State Ethics Commission, and the Division of Capital Asset Management and Maintenance also continued to provide their expertise in OIG trainings throughout the year. The OIG has also continued to offer several courses through its collaboration with the Massachusetts School Building Authority.



## Public Procurement (Chapter 30B) Technical Assistance

The L&D Division provides technical assistance to the public regarding the interpretation and application of the Uniform Procurement Act, Chapter 30B of the Massachusetts General Laws. Chapter 30B governs the sourcing and award of public contracts for supplies, services, and real property by cities, towns, and other local government jurisdictions, as well as the disposal of surplus supplies and real property. Chapter 30B helps to ensure open and fair competition by requiring that jurisdictions give qualified vendors an equal opportunity to be awarded government contracts.

The division’s Public Procurement Technical Support helpdesk advises on questions regarding public construction bidding laws, local purchasing requirements, fraud prevention, and internal controls, among other topics. Information on how individuals may submit questions via email, telephone, mail, or online form is available on the OIG’s website. Subject experts typically respond to inquiries within 24 to 48 hours, with consultation by telephone or virtual meetings in the case of more complicated Chapter 30B matters or when a state or municipal employee is new to public procurement.

### The Public Procurement Technical Support helpdesk fielded 1,270 inquiries in 2024.

A wide range of materials to inform government employees, vendors, and the general public about public procurement and contracting issues is available on the OIG’s website.

# Outreach

Throughout 2024, the OIG gave presentations and trainings for local, state, and regional groups and met with leaders in introductory meetings and listening sessions. These opportunities to step out of the office helped the OIG accomplish two goals.

## Better Government through Education

The OIG connected with professionals across the Commonwealth who have the shared goal of making government work better by engaging in ongoing professional education. The OIG provided trainings on topics such as boards' and commissions' responsibilities, program management, and fraud awareness. These trainings are in addition to the OIG Academy's core curriculum. They deliver timely, relevant content, and are specific to Massachusetts law.



**John William Ward Public Service Fellows attend an OIG presentation at 1 Ashburton Place.**

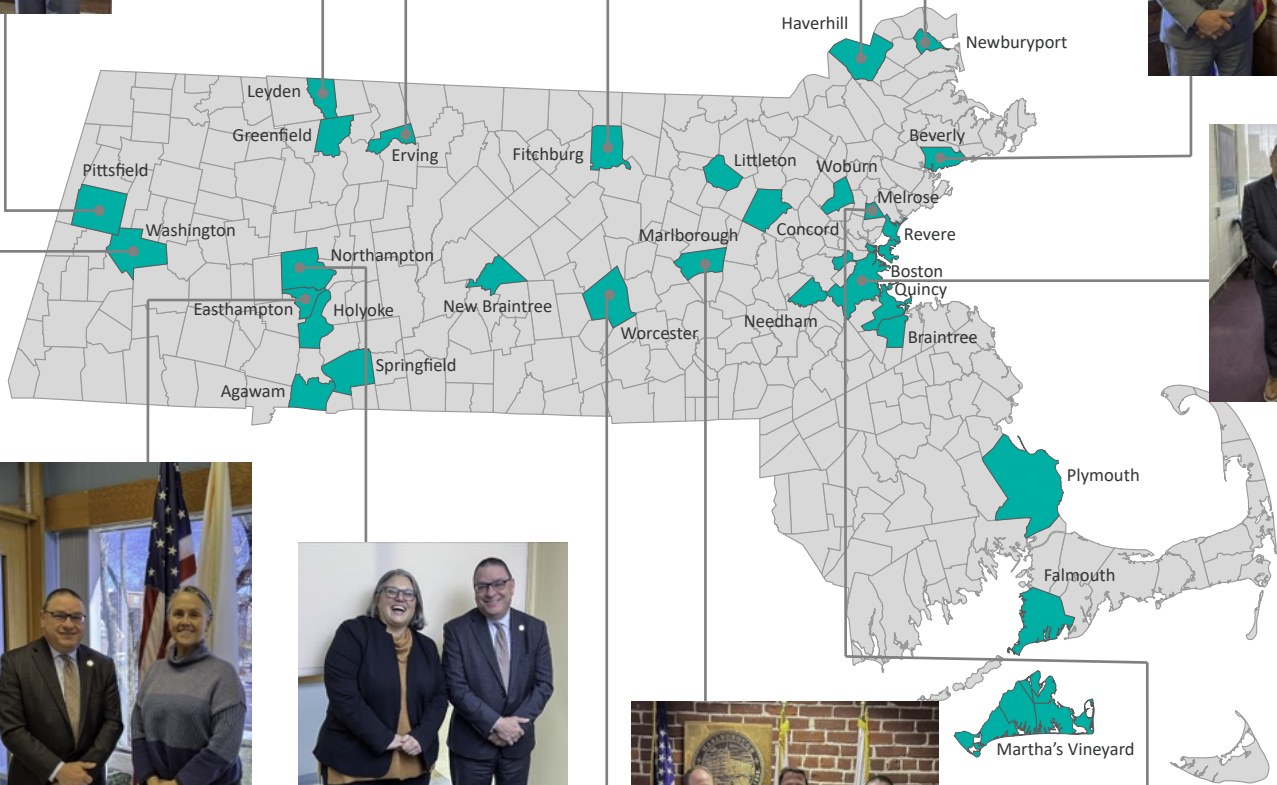
## Better Government through Engagement

The OIG heard directly from public employees who carry out the day-to-day operations of government to better understand their challenges and needs in navigating the complexity not only of public procurements but running the business of government. The Inspector General spent time in communities meeting with leaders, listening to their stories, and hearing about their pain points with public administration and public procurements. The very laws that were intended to prevent fraud, waste, and abuse can sometimes create unintended consequences which must be understood before they can be addressed.

Both the education and engagement opportunities inform how the OIG team approaches decision-making and problem-solving. The opportunities lead to new ideas, a better understanding of how rules and regulations affect the people carrying out the work, and better relationships for collaboration. The OIG offers many services and tools. By getting out and explaining all it has to offer, the OIG can help make government work better.



**Inspector General Shapiro and the OIG's Government Outreach and Public Policy Director speak with members of the Massachusetts Association of Public Purchasing Officials in Beverly.**



# OIG in the News

## The Boston Globe

Serving our community since 1872

WEDNESDAY, JANUARY 17, 2024

### Looking for 'creative ideas,' the T signed a \$325,000 deal. It got nothing of value, investigators say.

By Matt Stout Globe Staff. Updated January 17, 2024, 5:25 a.m.

### Ex-Leyden police chief accused of stealing equipment from department

Updated: Apr. 22, 2024, 1:15 p.m. | Published: Apr. 22, 2024, 1:00 p.m.

### Uxbridge School Committee member accused of deceiving town over his marijuana business

Brad Petrishen  
Worcester Telegram & Gazette

Published 2:19 p.m. ET May 31, 2024 | Updated 7:03 p.m. ET May 31, 2024

### IG Flags Lack Of Oversight On Retiree Double-Dipping

Shapiro Recommends Financial Penalties, Simplified Earnings Formula

Chris Lisinski  
Mar 27, 2024

### Plymouth man gets six months in jail after admitting Covid fraud

Aaron Fernandes was already in prison when he devised his scheme over a recorded phone line.

By Andrea Estes - Independent Staff  
03/20/2024

### Inspector General slams 'sham' and 'failure' at Star Store

The 138-page report details how incompetence, mismanagement, and wastefulness abounded among all involved public parties.

By Colin Hogan  
September 16, 2024

### Mass. Inspector General makes his inaugural visit to the R.I. State House. Here's why.

Special guest appearance comes amid bipartisan push for independent, fraud-focused oversight arm

By: NANCY LAVIN - MAY 22, 2024 8:31 PM

### WEED BOARD SKUNKED BY LAW

Cannabis Commission's underlying legislation needs an update, IG says

By Matthew Madigan  
matt@boston.com

Something has to change at the Cannabis Control Commission of the Legislature wants to bring the Commission's structure back to young marijuana industry after and still to hold the state's Inspector General told lawmakers during a hearing on the bill.

During a hearing of the Joint Committee on Cannabis, Public Health and Safety on Wednesday, the Inspector General said that the Commission's structure is "sham" and "failure" at Star Store.

The need for a revision, Shapiro said, is to be more and more independent, to be more and more independent, to be more and more independent.



...and, I believe, the next lead on — Chair, Commissioners, Executive Director, you not have any gender issues," he said.

"This is not about the people, but it's about structure, the governing structure needs to be fixed."

# Further Reading

The OIG publishes its reports, public letters, advisories, and the office newsletter, the *OIG Bulletin*, on its website. The OIG also publishes the Inspector General’s legislative testimony and provides updates on criminal and civil matters in which the office was previously involved. This section lists the OIG’s 2024 activities in these areas.

## Reports

[Pandemic Funding Oversight Quarterly Report: 2024 Fourth Quarter \(January 15, 2025\)](#)

[MBTA Privatization Review #4: Customer Service Call Center Contracts with Global Contact Services \(2017 – 2018\) and Exela Technologies \(2018 – 2024\) \(November 21, 2024\)](#)

[Pandemic Funding Oversight Quarterly Report: 2024 Third Quarter \(October 15, 2024\)](#)

[The Star Store 20-Year Lease: A Lack of Shared Vision and Collective Accountability Wastes Millions in Public Dollars \(September 16, 2024\)](#)

[Pandemic Funding Oversight Quarterly Report: 2024 Second Quarter \(July 1, 2024\)](#)

[2023 Annual Report \(April 30, 2024\)](#)

[Pandemic Funding Oversight Quarterly Report: 2024 First Quarter \(April 1, 2024\)](#)

[Post-Retirement Earnings Limits for Massachusetts Public Employees: A Review of a Flawed System \(March 26, 2024\)](#)

[MassHealth and Health Safety Net: 2024 Annual Report \(MassHealth’s Applied Behavior Analysis Program – Service Providers\) \(March 1, 2024\)](#)





## Letters

Letter to CEO of Commonwealth Corporation regarding its Career Technical Initiative's program administration (December 30, 2024)

Letter to Department of Early Education and Care Commissioner regarding the department's management of the Commonwealth Cares for Children (C3) Program (December 30, 2024)

Letter to Massachusetts State Police Colonel regarding policy changes initiated as a result of certification and accreditation (December 20, 2024)

Letter to Georgetown Select Board Chair, Georgetown Town Administrator, and Georgetown Conservation Commission Chair, regarding alleged payroll fraud by Georgetown's conservation agent (November 26, 2024)

Letter to Nantucket Memorial Airport Manager regarding the airport's appropriate use of \$10 million in COVID-era grant funds (October 30, 2024)

Letter to Superintendent of Orange Elementary Schools, Orange Town Administrator, Orange Elementary School Committee Chair, and Senior Project Manager, relating to the town's disposal of surplus equipment and inventory (October 18, 2024)

Letter to Executive Office of Energy and Environmental Affairs (EEA) Secretary, Department of Conservation and Recreation (DCR) Commissioner, and Massachusetts Environmental Police (MEP) Commissioner in regards to agencies' response to the OIG's May 30, 2024 letter (August 20, 2024)

Letter to Blackstone Town Administrator and Friends of Blackstone Council on Aging President regarding the former Blackstone Council on Aging director's improper fiscal relationship with an associated 501(c)(3) organization (August 19, 2024)

Letter to Secretary of Education regarding the former Department of Early Education and Care Commissioner's steering of an educational consulting contract toward a favored firm (August 14, 2024; revised September 18, 2024)

Letter to the Massachusetts Senate sharing the Inspector General's testimony before the House members of the Joint Committee on Cannabis Policy requesting that they appoint a receiver to manage the day-to-day operations of the Cannabis Control Commission (July 9, 2024)

Letter to Senate President, House Speaker, Senate Minority Leader, and House Minority Leader, outlining the Inspector General's request that the Legislature appoint a receiver to manage the day-to-day operations of the Cannabis Control Commission (June 18, 2024)

Letter to Executive Office of Energy and Environmental Affairs (EEA) Secretary, Department of Conservation and Recreation (DCR) Commissioner, and Massachusetts Environmental Police (MEP) Commissioner regarding DCR's and MEP's noncompliance with the reporting provisions of the Interdepartmental Service Agreement for MEP police details worked at DCR's state parks and pools (May 30, 2024)

Letter to Uxbridge Board of Selectmen Chair regarding the town's approval process for the host community agreement for a marijuana retail business (May 30, 2024)

## OIG Advisories

Preparing for the Next Emergency Now (December 31, 2024)

Navigating the Post-Retirement Earnings Rules for Public Employees (December 30, 2024)

Deadline for Spending ESSER Funds Approaches (August 20, 2024)

Off-Boarding and Banking Controls Protect Public Funds from Fraud (January 11, 2024)

## OIG Bulletins

*OIG Bulletin*, Volume 5, Issue 3 (November 2024)

*OIG Bulletin*, Volume 5, Issue 2 (July 2024)

*OIG Bulletin*, Volume 5, Issue 1 (March 2024)

## Case Updates

West Springfield man pleads guilty to defrauding Hampden County Retirement Board

Boston-area landlord arraigned on pandemic relief fraud charges





[Florida woman pleads guilty to defrauding Massachusetts housing agency](#)

[OIG announces agreement with W.B. Mason to refund overage in state contract](#)

[Plymouth woman pleads guilty to pandemic relief fraud](#)

[Former Chair of Grafton Select Board arrested for allegedly defrauding investors in his cannabis company](#)

[Plymouth woman arrested for Paycheck Protection Program fraud](#)

[Former Leyden police chief arraigned on theft charges](#)

[Plymouth man pleads guilty to pandemic unemployment fraud](#)

[Former CEO of Casa Nueva Vida ordered to pay \\$382,843.67 in restitution](#)

[Former UMass student arraigned on larceny and forgery charges in state pension scheme](#)

## Inspector General's Legislative Testimony

[Inspector General's Testimony before the Joint Committee on Cannabis Policy regarding the appointment of a receiver for the Cannabis Control Commission \(July 9, 2024\)](#)

[Inspector General's Testimony before the Boston City Council Committee on Government Operations regarding the creation of a Boston OIG \(May 29, 2024\)](#)

[Inspector General's Testimony before the Rhode Island House Committee on Finance regarding Rhode Island House Bill 7027, an act to create a Rhode Island OIG \(May 22, 2024\)](#)

[Inspector General's Testimony before the Joint Committee on Municipalities and Regional Government regarding Senate 2571, the Municipal Empowerment Act \(February 27, 2024\)](#)

[Inspector General's Testimony before the House and Senate Committees on Ways and Means regarding the Fiscal Year 2025 Budget \(February 7, 2024\)](#)

# Acknowledgments

In an interview with WCAI in Falmouth, I was asked to describe my job. My sincere answer was that I have the best job in government. As the Commonwealth’s Inspector General, I have many ways to effect change and make government work better tomorrow than it did today. These changes are real, and they have meaningful impact. The OIG’s greatest assets are the dedicated professionals who I have the honor to work with at the OIG. While my name is on the door and the cover of this report, my colleagues’ tireless commitment to our mission and their impactful work make my job rewarding. We truly make a difference through our work.

I am also grateful to the many local, county, state, and federal officials who have taken time to meet with me and share their thoughts and experience with “the government.” As a leader, it is important for me to have a broad understanding of what is working and what is not working. Whether through a scheduled meeting in their office or a quick conversation at a conference, their candor and perspective are invaluable to me. These conversations make me a better Inspector General.

I’ve spent my entire career in public service because I believe in government. I believe in public education, public libraries, public transportation, and public housing. While I don’t determine how funds are spent, I do work to ensure that they are spent as the Legislature and the Administration intended. In doing so, I hope to reaffirm or restore the people’s faith in government.



Jeffrey S. Shapiro, Esq., CIG  
Inspector General  
April 30, 2025

# Endnotes

1. EOHLC was known as the Department of Housing and Community Development (DHCD) at the time of Jones' employment.
2. The RAFT program provides funds to assist low-income Massachusetts residents facing eviction and other housing emergencies.
3. Construction projects typically involve three phases that run sequentially: planning, design, and construction. However, under the construction management at-risk model, the awarding authority uses a two-phase selection process and hires a construction manager early in the design process to later oversee construction. The awarding authority and construction manager negotiate a maximum price for the project during the design phase. The method is "at risk" because the construction manager is responsible for any costs exceeding that amount. There is a third model for public works projects called the design-build model. In the design build model, design and construction are combined into a single stage. The awarding authority executes a contract with a single entity – *e.g.*, a design-build firm, joint venture, or contractor that subcontracts with a designer – to design and construct the project. To use CM at-risk or design-build models on projects of \$5 million or more, an awarding authority (except for certain exempt agencies) must apply to the OIG for approval to proceed.
4. Funding for the Jabish Brook Middle School project was ultimately not approved by Belchertown voters.
5. Section 72(e) of Chapter 22C of the Massachusetts General Laws previously required the DSPO to produce a separate annual report of its activities in the preceding calendar year. Section 5 of Chapter 2 of the Acts of 2023, effective March 29, 2023, amended Section 72(e) by directing that the DSPO annual report be included as part of the OIG's officewide annual report required under Section 12 of Chapter 12A of the Massachusetts General Laws.
6. Enacted into law as Chapter 253 of the Acts of 2020, the police reform legislation amended Section 3 of Chapter 22C of the Massachusetts General Laws to give the governor the authority to go outside of the MSP in appointing a colonel. Prior law required the appointment to come from within the MSP's ranks.
7. See MASS. OFFICE OF THE INSPECTOR GENERAL, *2021 ANNUAL REPORT* at 36, available at <https://www.mass.gov/doc/oig-2021-annual-report/download>.
8. See MASS. OFFICE OF THE INSPECTOR GENERAL, *2020 ANNUAL REPORT* at 32, available at <https://www.mass.gov/doc/oig-2020-annual-report/download>; MASS. OFFICE OF THE INSPECTOR GENERAL, *2021 ANNUAL REPORT* at 36, available at <https://www.mass.gov/doc/oig-2021-annual-report/download>.
9. After multiple troopers were charged for crimes related to overtime abuse in 2018, the MSP abolished Troop E and transferred its responsibilities to other troops in the MSP.

10. In 2016, the MSP had yet to install automated vehicle locator (AVL) technology in its cruisers as an internal control to increase trooper accountability and as a measure to increase trooper safety. For the review of 2016 shifts, the DSPO used radio affiliation data generated from each trooper's cruiser radio.
11. These findings are based on reasonable conclusions drawn from the data reviewed. They are not definitive findings that a trooper was engaged in wrongdoing or was not working in any law enforcement capacity. Further investigation would be needed to make those determinations.
12. The order specifically states, "[I]n order to maintain strict accountability, the OIC will conduct a roll call with all assigned officers and physically observe each member assigned to the initiative at the beginning and end of each mobilization. At the conclusion of the mobilization the OIC will hold a demobilization briefing." 20-DFS-076.
13. These shifts typically involve four troopers working as a team, including the OIC.
14. MPAC was established in October 1996 through the combined efforts of the Massachusetts Chiefs of Police Association, the Massachusetts Police Accreditation Coalition, and the Executive Office of Public Safety and Security. Pursuant to Executive Order 392, MPAC was initially created as a state agency within the Executive Office of Public Safety and Security, mandated to oversee accreditation for police organizations throughout the Commonwealth. In February 2004, MPAC transitioned from a state agency to a private nonprofit organization.
15. To earn MPAC certification, a police agency must demonstrate compliance with 159 mandatory standards. To earn MPAC accreditation, a police agency must demonstrate compliance with 257 mandatory standards, as well as certain optional standards. MPAC requires a police agency to achieve certification before it will assess the agency for accreditation. *The Standards*, THE MASSACHUSETTS POLICE ACCREDITATION COMMISSION, <https://www.masspoliceaccred.net/standards> (last visited April 9, 2025).
16. See Section 196 of Chapter 46 of the Acts of 2015.
17. *Id.*
18. The Procurement and Logistics Department does not handle procurements related to large-scale construction and infrastructure. Those projects are handled by the Capital Delivery Department.
19. Although the formal records system went into effect in July 2023, the MBTA reported that it made efforts to collect and maintain previous procurements prior to this date.
20. Automated fare collection is the MBTA's latest fare collection system and will ultimately replace the current Charlie Card and Charlie Ticket system. With AFC 2.0, riders can pay their transit fares with a contactless debit card, credit card, phone, or watch (equipped with a mobile wallet) by tapping contactless payment fare boxes (or "fare readers") located throughout the MBTA system.
21. The NEVI program provides federal funding to states that meet certain requirements for the construction of EV charging stations. States must contribute a minimum of 20% non-federal match for project costs. To receive NEVI funding states must develop, submit, and update State EV Infrastructure Deployment Plans to the FHWA. States

resubmit their plans annually. States are then required to spend NEVI funds in accordance with their approved deployment plans.

22. CRRC MA is formerly known as CNR MA Corporation. CNR MA Corporation and its predecessor entities are controlled by CRRC Corporation Limited (CRRC), a Chinese state-owned and publicly traded rolling stock manufacturer. CRRC is the largest rolling stock manufacturer in the world in terms of revenue, operating 46 wholly/majority-owned subsidiaries with over 170,000 employees worldwide. CRRC traces its manufacturing history in China back to the 1950s.
23. The OIG's former Regulatory and Compliance Division was renamed the Learning and Development Division as part of the OIG's 2024 office reorganization.

# Index

[Asset Management Board](#), 44

[Attorney, U.S.](#), 34

[Attorney General, Massachusetts](#), 34, 78

[Blackstone, town of](#), 28

[Cannabis Control Commission](#), 9, 38

[Chelsea Veterans Home](#), 31

[Commonwealth Corporation](#), 33

[Construction management at-risk delivery method](#), 42

[Department of Agricultural Resources, Massachusetts](#), 32

[Department of Conservation and Recreation, Massachusetts](#), 29

[Department of Developmental Services](#), 51

[Department of Early Education and Care](#), 32

[Department of Elementary and Secondary Education](#), 32

[Department of Labor Standards](#), 78

[Department of Mental Health](#), 53

[Department of Public Health](#), 33, 54

[Department of Public Utilities](#), 69

[Department of Transitional Assistance](#), 48

[Division of Capital Asset Management and Maintenance \(DCAMM\)](#), 9, 30, 78

[Executive Office of Education](#), 29

[Executive Office of Health and Human Services](#), 45 – 54

[Executive Office of Housing and Livable Communities](#), 32

[Executive Office of Veterans Services](#), 31

[Georgetown, town of](#), 29

[Grafton, town of](#), 34

[Hampden County](#), 35

[Health Safety Net](#), 33

**Holyoke Veterans Home, 31**  
**Inspector General Council, 5, 25**  
**Leyden, town of, 35**  
**Massachusetts Bay Transportation Authority (MBTA), 63 – 72**  
**Massachusetts Department of Transportation (MassDOT), 63 – 72**  
**Massachusetts Environmental Police (MEP), 29**  
**Massachusetts Certified Public Purchasing Official (MCPPO) Designation, 75, 76**  
**Massachusetts State Police (MSP), 55 – 62**  
**MassHealth, 33**  
**Nantucket Memorial Airport, 68**  
**New Bedford, city of, 9, 30**  
**OIG Academy, 10, 23, 74**  
**One Free Designee program, 77**  
**Orange, town of, 29**  
**Star Store, New Bedford, 9, 30**  
**State Ethics Commission, 78**  
**University of Massachusetts Building Authority, 78**  
**University of Massachusetts Dartmouth (UMD), 9, 30**  
**Uxbridge, town of, 28**

# *Making Government Work Better Today Than It Did Yesterday*

Report Suspected Fraud, Waste and Abuse to the OIG Fraud Hotline

1-800-322-1323

[IGO-FightFraud@mass.gov](mailto:IGO-FightFraud@mass.gov)

Have a Question About Chapter 30B? Send Us An Email At

[OIGProcurementSupport@mass.gov](mailto:OIGProcurementSupport@mass.gov)

Visit Us At

[www.mass.gov/ig](http://www.mass.gov/ig)

Connect With Us At

