

OFFICE OF THE STATE INSPECTOR GENERAL  
Report to W. Taylor Reveley III, President

*THE COLLEGE OF WILLIAM AND MARY  
PERFORMANCE REVIEW*

January 2017



June W. Jennings, CPA  
State Inspector General  
Report No. 2016-PR-005



*COMMONWEALTH OF VIRGINIA*  
*Office of the State Inspector General*

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January 31, 2017

W. Taylor Reveley III, President  
The College of William and Mary  
105 Jamestown Road  
Williamsburg, VA 23185

Dear President Reveley:

The Office of the State Inspector General (OSIG) is empowered, under § [2.2-309](#) [A](10) of the *Code of Virginia*, to conduct performance reviews of state agencies, including colleges and universities, to ensure that state funds are spent as intended and to evaluate the efficiency and effectiveness of programs in accomplishing their purposes. Based on this authority, OSIG conducted a performance review of the College of William and Mary (W&M). The review covered the period of July 1, 2014 to June 30, 2016.

Initially, the review focused on the following risk areas:

- General Fund Appropriations
- Inventory/Assets
- Procurement
- Human Resources
- Revenue (Non-general Fund)
- Accounting and Financial Reporting

These risk areas were selected for review at W&M based on a 2013 statewide risk assessment conducted by Deloitte LLP. The risk assessment ranked W&M as medium risk among the executive branch agencies within the Commonwealth of Virginia.

During the planning phase, consisting of conducting interviews with selected members of W&M's executive and divisional management and assessing the risks identified during those interviews, OSIG narrowed the risk areas for further review to three:

- Procurement
- Science, Technology, Engineering, and Mathematics (STEM)
- Succession Planning

OSIG identified specific objectives for each of the three risk areas and developed a detailed review plan to accomplish each objective. The steps in the review plan were executed, and the results were discussed with W&M's management on January 30, 2017.

Observations from the review and the response of W&M's management to OSIG's recommendations are included in the attached report.

OSIG appreciates the assistance provided by W&M's faculty and staff during this review.

Respectfully,

June W. Jennings, CPA  
State Inspector General

CC: Paul J. Reagan, Chief of Staff to Governor McAuliffe  
Suzette P. Denslow, Deputy Chief of Staff to Governor McAuliffe  
Dietra Trent, PhD, Secretary of Education  
The Honorable Stephen D. Newman, Chair, Senate Education and Health Committee  
The Honorable R. Steven Landes, Chair, House Education Committee  
Todd A. Stottlemeyer, Rector, The College of William and Mary

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## Executive Summary

The Office of the State Inspector General (OSIG) reviewed the following risk areas at the College of William and Mary (W&M): Procurement; Science, Technology, Engineering, and Mathematics (STEM); and Succession Planning.

The review had the following objectives:

- Determine whether the Procurement Department personnel are efficiently making use of their time in making decisions regarding order fulfillment.
- Develop or identify performance measures for the Procurement Department.
- Evaluate existing performance measures for the Procurement Department as to what extent the performance measures meet the needs of the stakeholders.
- Determine whether W&M has an efficient and effective method of managing STEM.
- Determine whether W&M has an efficient and effective method of overseeing STEM faculty Start-Up Packages.
- Determine whether resource planning is comprehensive enough to ensure new and existing facilities will be available to meet future needs of students in STEM degree programs.
- Determine whether W&M's succession planning is sufficient to ensure seamless transition when there is turnover of employees in key positions.

As part of the review, OSIG performed the following procedures:

- Gained an understanding of the risk areas by reviewing policies and procedures, conducting interviews with W&M's personnel, and researching best practices for each risk area.
- Gathered and analyzed data obtained from W&M's personnel and other sources.
- Conducted observations and walk-throughs of the various processes and assessed each significant process for efficiency and effectiveness.
- Benchmarked W&M's business processes and performance metrics to other state entities and to industry best practices.

All of the objectives were met. At the conclusion of the review, OSIG had the following recommendations for W&M:

RECOMMENDATIONS
1. W&M Procurement Department should strive to track additional performance measures that are relevant to the Department's strategic goals.
2. The Procurement Department could benefit from an action plan aligned with W&M's strategic plan.
3. W&M should develop a formal agreement, separate from the letter of intent, detailing the terms and conditions of each Start-Up Package.

## Purpose and Scope of the Review

The Office of the State Inspector General (OSIG) conducted a performance review of the College of William and Mary (W&M) pursuant to *Code of Virginia* § [2.2-309](#) [A](10) whereby the State Inspector General shall have the power and duty to:

“Conduct performance reviews of state agencies to assess the efficiency, effectiveness, or economy of programs and to ascertain, among other things, that sums appropriated have been or are being expended for the purposes for which the appropriation was made and prepare a report for each performance review detailing any findings or recommendations for improving the efficiency, effectiveness, or economy of state agencies, including recommending changes in the law to the Governor and the General Assembly that are necessary to address such findings.”

This review was not designed to be a comprehensive review of W&M. Instead, the focus was on certain areas identified through a statewide risk assessment of state agencies and interviews with W&M’s executive management. The scope and objectives of the review were established through interviews with management concerning W&M’s risks in these areas:

- Procurement
- Science, Technology, Engineering and Mathematics (STEM)
- Succession Planning

The review focused on W&M, per se, and not on Richard Bland College (RBC) or the Virginia Institute of Marine Sciences (VIMS).

The review covered the period of July 1, 2014 through June 30, 2016.

OSIG developed the following objectives for the review:

- Determine whether the Procurement Department personnel are efficiently making use of their time in making decisions regarding order fulfillment.
- Develop or identify performance measures for the Procurement Department.
- Evaluate existing performance measures for the Procurement Department as to what extent the performance measures meet the needs of the stakeholders.
- Determine whether W&M has an efficient and effective method of managing STEM.
- Determine whether W&M has an efficient and effective method of overseeing STEM faculty Start-Up Packages.
- Determine whether resource planning is comprehensive enough to ensure new and existing facilities will be available to meet future needs of students in STEM degree programs.
- Determine whether W&M’s succession planning is sufficient to ensure seamless transition when there is turnover of employees in key positions.

## Background

Within the Commonwealth, W&M falls under the purview of the Secretary of Education. However, W&M is subject to the Restructured Higher Education Financial and Administrative Operations Act, making W&M a Tier III institution. The Restructuring Act gives W&M some level of autonomy in its administration and operations.

The Commonwealth includes W&M as a component unit in the Commonwealth's comprehensive annual financial report (CAFR). W&M presents annual consolidated financial statements that include Richard Bland College (RBC) and the Virginia Institute of Marine Sciences (VIMS).

W&M, RBC, and VIMS share a Board of Visitors. The Governor of the Commonwealth of Virginia appoints the board. Despite sharing a board with W&M and VIMS, RBC conducts its operations independently from W&M and VIMS. W&M and VIMS share some operational activities.

W&M has approximately 6,301 undergraduate and 2,183 graduate students across its main campus in Williamsburg, the marine science campus in Gloucester Point and its Washington, DC center. W&M offers more than 40 undergraduate programs and about 20 programs at its graduate/professional schools. The 624 full-time faculty members oversee the undergraduate and graduate programs. W&M reports a student-faculty ratio of 12:1, and 84 percent of undergraduate courses have 40 or fewer students.

## *Procurement*

As a Tier III institution with a valid management agreement with the Commonwealth of Virginia as mandated by the Restructuring Act, W&M may be exempt or choose to deviate from certain parts of the Virginia Public Procurement Act (VPPA). Overall, the VPPA acts as a guide for procurement, especially since W&M's Board of Visitors and employees are subject to VPPA's provisions for Ethics in Public Contracting.

The Restructuring Act exempts W&M from reporting its purchases to the Secretary of Education. However, in order to qualify for this exemption, all W&M purchases have to be placed through the Commonwealth's electronic procurement system, eVA.

W&M's Office of Procurement performs procurement functions for both W&M and VIMS. However, this review focused only on W&M. In FY 2015, according to eVA, W&M's spending on procurement, excluding VIMS, was approximately \$120 million.

## *STEM*

At the federal government level, student proficiency in STEM is viewed as a critical piece for securing the nation's future economic growth. According the United States government's

President's Council of Advisors on Science and Technology (PCAS), it is projected that there will be a shortfall of one million STEM graduates over the next decade. This will, in turn, lead to a shortage in STEM professionals and, if not addressed, may adversely impact the nation's economy.

The concern about the shortfall in STEM workforce and its economic impact has spurred an increased focus on STEM at the federal and state levels. The federal government developed a STEM Five-Year Strategic Plan to address this concern. The Commonwealth of Virginia addressed STEM workforce development through the Virginia Higher Education Opportunity Act of 2011, also known as the Top Jobs Act.

The Commonwealth's Top Jobs Act influences funding policies and priorities for institutions of higher learning such as W&M. The Top Jobs Act specifically requires that the governing board of each public institution of higher education within the Commonwealth develop and adopt a six-year strategic plan that is structured consistent with the purposes of the Act.

Federal funding is competitive. Meanwhile, state funding faces perennial cuts. According to a study by Ithaka S+R<sup>1</sup>, between FY 2001 and FY 2014, state funding per in-state student at four-year institutions declined by 46 percent. State funding trends increase pressure on W&M to manage available STEM resources effectively, efficiently, and economically.

### ***Start-Up Packages***

A Start-Up Package is an incentive arrangement between a university and an in-coming faculty member. The university provides monetary and non-monetary support to the in-coming faculty member to assist him or her to successfully transition into a faculty position at the university, and continue with his or her academic responsibilities in a manner that will enable the faculty member to ultimately attain academic tenure. The dollar value of the Start-Up Package can vary from a few hundred dollars to several thousand dollars.

### ***Succession Planning***

According to the Department of Human Resource Management (DHRM), the turnover rate for State employees in FY 2015 was 13.15 percent. This is considerably higher than the turnover rate in private industry which the DHRM's State Government Workforce Succession Trends Report notes is between 6 percent and 10 percent for FY 2015. The higher employee turnover rate is mirrored at the State's institutions of higher education. For example, at W&M, for the period July 1, 2015 to June 30, 2016, the turnover rate for operational exempt staff was 14.38 percent. The turnover rates are of concern because some of the personnel that exit employment with the Commonwealth's agencies and institutions of higher education hold key positions.

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<sup>1</sup> The Effects of Rising Student Costs in Higher Education: Evidence from Public Institutions in Virginia



Workforce Planning involves making decisions on whether to hire from outside or from within the organization. The International Public Management Association for Human Resources (IPMA-HR)<sup>2</sup> defines workforce planning as, “the process of formulating plans to fill future employment openings, based on projecting: The positions that are expected to be open, and whether these will be filled by inside or outside applicants.” Succession Planning identifies and develops a pool of current employees to be considered for future positions. IPMA-HR defines succession planning as, “The process of identifying long-range needs and cultivating a supply of internal talent to meet those future needs. Used to anticipate the future needs of the organization and assist in finding, assessing and developing the human capital necessary to the strategy of the organization.”

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<sup>2</sup><http://ipma-hr.org/hr-resources/hr-management-glossary#17>

## Review Methodology

OSIG planned for this review by:

- Examining the detailed results of Deloitte’s statewide risk assessment.
- Conducting interviews with W&M personnel to gain insight into the specific concerns from within the risk areas identified by Deloitte.
- Performing web research to gain an understanding of the risk areas identified in Deloitte’s risk assessment.

As a result of the procedures above, OSIG narrowed the scope of the review to three specific risk areas:

- Procurement
- Science, Technology, Engineering, and Mathematics (STEM)
- Succession Planning

OSIG then established review objectives for each risk area and developed detailed review procedures to address these objectives. In addition, indicators or opportunities for fraud, waste, or abuse were assessed.

The performance review procedures performed included:

- Gaining an understanding of the risk areas by reviewing policies and procedures, conducting interviews with W&M’s personnel, and researching best practices for each risk area.
- Gathering and analyzing data obtained from W&M’s personnel and other sources.
- Conducting observations and walk-throughs of the various processes and assessing each significant process for efficiency and effectiveness.
- Benchmarking W&M’s business processes and performance metrics to other state entities and to industry best practices.

During the review, OSIG made observations regarding effectiveness and efficiency of various processes within the risk areas. OSIG made a recommendation to address each observation. The management of W&M was provided with an opportunity to respond to the recommendations.

## Review Results

Specific objectives addressed and procedures conducted are reported by risk area below.

### *Risk Area 1 – Procurement*

<i>Objective</i>	<i>Was Objective Met?</i>
Determine whether the Procurement Department personnel are efficiently making use of their time in making decisions regarding order fulfillment.	Yes
Develop or identify performance measures for the Procurement Department.	Yes
Evaluate existing performance measures for the Procurement Department as to the extent to which the performance measures meet the needs of stakeholders.	Yes

OSIG gained an understanding of procurement processes at W&M by reviewing policies and procedures, interviewing Procurement Department personnel, and reviewing information on the W&M website. OSIG also analyzed procurement spend, researched procurement performance measures and best practices, and inquired about performance measures related to procurement at W&M.

The Procurement Department at W&M complies with the Commonwealth of Virginia Purchasing Manual for Institutions of Higher Education and Their Vendors. The manual makes it mandatory that competitive sealed bidding or competitive negotiations be used for procurement of goods and services of \$50,000 or more. The manual allows W&M to develop procurement procedures, referred to as Small Purchase Policies and Procedures, for goods and services under \$50,000.

Under the Small Purchase Policies and Procedures, W&M has delegated spending authority to select individuals outside of the Procurement Department for goods and services of \$5,000 or less. These individuals are authorized to make procurement decisions, within their spending limit, and pay for goods or services using W&M’s Small Purchase Charge Card (SPCC) without consulting with the Procurement Department. All other procurement decisions for goods and services greater than \$5,000 are made by Procurement Department personnel.

The Procurement Department has a staff of 10. According to W&M’s Director of Procurement, one of the Department’s goals is to offer the best customer service to the W&M community. In addition to traditional procurement activities such as sourcing and vendor management, the staff spends considerable time providing procurement solutions and answers to questions.

OSIG identified various performance measures that could be adapted by W&M’s Procurement Department. The performance measures were shared with the Director of Procurement. OSIG also evaluated the performance measures that the Procurement Department currently tracks and concluded that the performance measures meet the needs of stakeholders. However, as noted in

Observation No. 1 below, the Procurement Department could benefit from additional performance measures.

**OBSERVATION NO. 1 — ADDITIONAL PERFORMANCE MEASURES COULD HELP GENERATE COST SAVINGS**

According to discussions with the management of the Procurement Department, the Department tracks the following performance measures:

1. SPCC Efficiency and Cost Savings
2. Use of Small, Women, and Minority-Owned (SWaM) business
3. Strategic Sourcing Procurement Savings
4. Purchase Orders (POs) greater than \$5,000

Agency Risk Management and Internal Control Standards (ARMICS) minimum requirements stipulate that an agency must, “Document and assess the effectiveness of the agency's monitoring activities.” The standards provide management reviewing key performance indicators as an example of a monitoring activity. In addition, one of the goals of W&M Strategic Plan FY 2015-FY 2019 is to, “Enhance efficiency and effectiveness of operations and identify opportunities for revenue generation or cost savings across the institution.”

The Procurement Department identified providing the best customer service for each procurement transaction as one of its goals. In FY 2015, approximately 6,100 procurement transactions totaling \$90,363,000 were processed by the department. Given this number of transactions, providing excellent customer service for each transaction is time intensive. According to the Procurement Department’s management, the Department is so pressed for time that it is unable to undertake monitoring of additional performance measures.

By not developing and monitoring additional performance measures, such as one to monitor customer satisfaction, the Department may not be able to evaluate whether or not it is achieving its goals.

***RECOMMENDATION***

The W&M Procurement Department should strive to track additional performance measures that are relevant to the Department’s strategic goals. For example, to monitor customer satisfaction, W&M could emulate another Tier III university by developing a 15-second survey of each customer's experience at the end of a procurement transaction.

***MANAGEMENT RESPONSE***

Management agrees with the conditions observed and the recommendation, with the following observations:

Over the past three years, the Procurement Office has completely overhauled the university's procurement program, developing more robust policies and procedures, improving the process for contract reviews, and delegating authority to individual business units when appropriate. As part of this initiative, the Procurement Office has focused on face-to-face training of more than 600 users across campus and developing on-line resources. Although the Procurement Office has tracked volume metrics for some time, it has begun more recently to track efficiencies resulting from the program's overhaul.

At the same time William & Mary (W&M) began focusing on its general procurement programs, it also initiated one of the first strategic sourcing initiatives in the Commonwealth of Virginia. This new program has resulted in tracking savings and efficiency data that was not previously tracked. Our program continues to evolve and is on the leading edge of strategic sourcing activities in the Commonwealth.

With the recruitment of new Procurement Director (anticipated start date November 2016), W&M will continue adding to the growing list of performance measures we track. While many of the measurements will be data centric, others will be more subjective and qualitative as we assess the level of service provided to our customers and vendors.

**OBSERVATION NO. 2 — DEPARTMENT COULD BENEFIT FROM AN ACTION PLAN ALIGNED WITH W&M'S STRATEGIC PLAN**

The mission of the Procurement Department is to "support the integral goals of the College of William & Mary and Virginia Institute of Marine Science." However, the Department has not established specific goals or objectives that it will strive to achieve, or metrics it will monitor, to assess its progress towards achieving the identified mission.

One of the goals in the W&M Strategic Plan FY 2015-FY 2019 is to, "Enhance efficiency and effectiveness of operations and identify opportunities for revenue generation or cost savings across the institution." In order to achieve this goal, it may be necessary that each operational unit of W&M, including the Procurement Department, develop an action plan, aligned with W&M's strategic plan, with explicit goals and metrics that can be assessed for efficiency and effectiveness.

From discussions with the Procurement Department's management, the Department has been slow to embrace strategic management. Prior to FY 2015, the Department had more of a transaction focus than a strategic focus. The transaction focus was reactive, and therefore required less goal and objective setting, and relied on compliance with procurement rules and regulations, and legislatively mandated reporting requirements, and less on proactive analysis. For example, in FY

2015, the Department focused on ensuring that more than 6,100 procurement transactions were conducted in accordance with the VPPA, more than 61,000 small dollar transactions complied with the SPCC regulations, and that the transactions met the requirements of the Governor’s Executive Order Number 20 (2014) on SWaM businesses. A review of W&M’s FY 2015 annual financial report, audited by the Auditor of Public Accounts (APA), and inquiry about SWaM reporting to the Department of Small Business and Supplier Diversity (SBSD) do not indicate any compliance deficiencies by W&M. No strategic analysis was noted for FY 2014. However, as noted during the review of performance measures, the Department adopted SPCC spending analysis in FY 2015 and strategic sourcing analysis in FY 2016.

In the absence of an action plan, the Department may end up achieving its operational goals but ultimately, not align itself to the overall goals of W&M.

**RECOMMENDATIONS**

The Procurement Department should develop and implement an action plan, laying out goals, objectives, and metrics that align with W&M’s overall strategic plan.

**MANAGEMENT RESPONSE**

Management agrees with the conditions observed and the recommendation, with the following observations:

W&M has recently recruited a new Procurement Director, who we anticipate will be on board by mid-November 2016. Over the next year under her direction, the Procurement Office will develop an action plan with specific goals and objectives to assess how the Office is meeting the university’s goals.

**Risk Area 2 – Science, Technology, Engineering, and Mathematics (STEM)**

<b>Objective</b>	<b>Was Objective Met?</b>
Determine whether W&M has an efficient and effective method of managing STEM.	Yes
Determine whether W&M has an efficient and effective method of overseeing STEM faculty Start-Up Packages.	Yes
Determine whether resource planning is comprehensive enough to ensure new and existing facilities will be available to meet future needs of students in STEM degree programs.	Yes

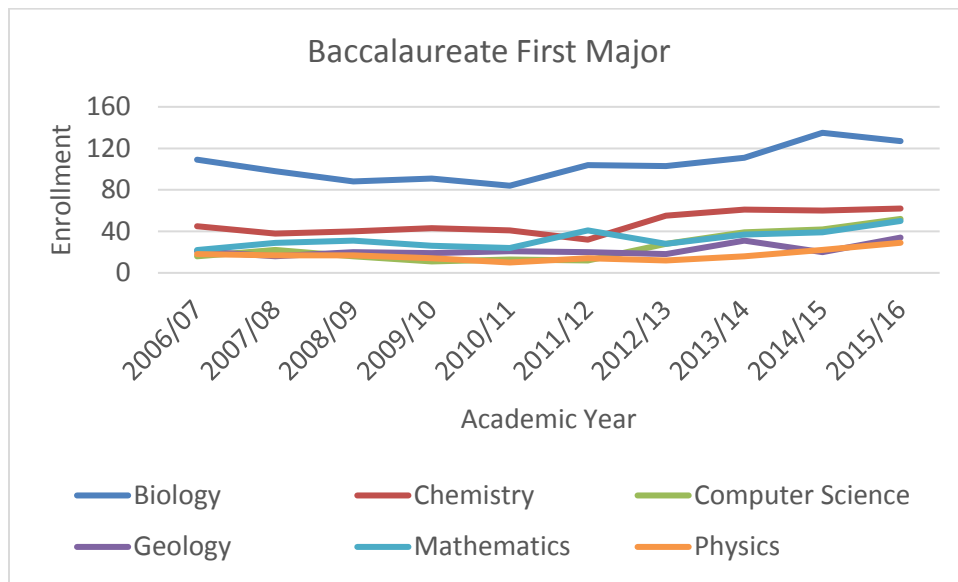
OSIG gained an understanding of STEM processes at W&M by reviewing policies and procedures, interviewing W&M management personnel, and reviewing information on W&M’s website. OSIG identified STEM degree programs, reviewed expenditures, strategic plan, and W&M’s relationship with private STEM entities and the federal government. In addition, OSIG gained an understanding

of the Start-Up Package award process at W&M by interviewing management from the School of Arts and Sciences.

Based on the State Council of Higher Education for Virginia (SCHEV) classification, W&M offers 17 STEM degree programs. The student enrollment in STEM programs has risen steadily from 22 percent (609 out of 2,780) who had declared a major in Fall 2011 to 29 percent (916 out of 3,136) in Fall 2015. The programs receive funding from private and public sources. For example, according to USAspending.gov, in FY 2015, W&M received more than \$5.5 million from the National Science Foundation.

At the School of Arts and Sciences, the amount and details of a Start-Up Package are negotiated by the chair of the Department and the in-coming faculty member. Once funding for the package has been approved and allocated by the Dean of the School of Arts and Sciences, any expenditure of the package funds is monitored by the Department’s fiscal officer. OSIG was impressed by the control activity over the Start-Up Package process requiring that each expenditure be approved by the fiscal officer and the chair of the department.

The chart below shows increasing enrollment in core STEM undergraduate programs from 2006/2007 academic year to 2015/2016 academic year. OSIG noted construction plans in W&M’s Six-Year Capital Plan to expand STEM facilities to accommodate the increasing enrollment.



Source: The College of William and Mary, Office of Institutional Research

**OBSERVATION NO. 3 — START-UP PACKAGE AGREEMENTS**

A Start-Up Package is a multi-year incentive arrangement between an employer and an employee. The employer, in this case, W&M, provides monetary and non-monetary support to an incoming employee, typically instructional faculty, to assist him or her to successfully transition into a

faculty position at W&M, and continue with his or her academic responsibilities in a manner that would enable him or her to ultimately attain academic tenure. Details of the W&M Start-Up Package offer are condensed into two sentences in an incoming faculty member's Letter of Intent. One Letter of Intent reviewed by the auditor, states that, "The College will provide up to \$XXX<sup>3</sup> in start-up funds to support your research. These funds may be used for equipment, postdoc salary, supplies, travel, etc., and should be expended by the conclusion of the 2016-17 academic year." According to the management of W&M's School of Arts and Sciences, these two sentences typically constitute the extent of any written agreement between W&M and the incoming faculty member.

One of the seven challenges identified in the W&M Strategic Plan is to, "Develop and implement a business plan that maximizes revenue sources and ensures transparent resource allocation in support of College priorities and needs." Spelling out the terms and conditions of the Start-Up Package in a written document would ensure transparency.

Most Start-Up Packages are funded for multiple years. Because circumstances can change from year to year, a good management practice would be to document in writing, the Start-Up Package transaction and understanding.

The funding source for a Start-Up Package could be private or public funds. Prudent and accountable stewardship of private and public funds require documented and verifiable understanding of commitment of public funds.

A Start-Up Package is a recruitment tool and the funding needs of each incoming faculty member being offered a Start-Up Package are unique. The W&M academic administration prefers an open-ended offer that gives it flexibility in negotiations with the in-coming faculty member.

If the two sentences in the Letter of Intent referring to the Start-Up Package constitute the complete agreement between W&M and the in-coming member of faculty, the agreement may be subject to varying interpretation by either party and could lead to litigation.

***RECOMMENDATION***

To enhance transparency and accountability for each Start-Up Package, and to ensure common understanding between the college and the incoming faculty member, W&M should develop a formal agreement, separate from the letter of intent, detailing the terms and conditions of the Start-Up Package.

***MANAGEMENT RESPONSE:***

Management agrees with the conditions observed and the recommendation.

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<sup>3</sup> Amount withheld by auditor for confidentiality



### ***Risk Area 3 – Succession Planning***

<b><i>Objective</i></b>	<b><i>Was Objective Met?</i></b>
Determine whether W&M’s succession planning is sufficient to ensure seamless transition when there is turnover of employees in key positions.	Yes

OSIG gained an understanding of Succession Planning processes at W&M by reviewing policies and procedures, interviewing W&M management personnel, and reviewing information on W&M’s website. OSIG also researched and inquired about Succession Planning best practices at other state agencies and in states other than the Commonwealth of Virginia.

At W&M, the responsibility for succession planning is devolved to the colleges and schools. Each college or school conducts its own workforce planning and decides whether to recruit for an open position from within or seek external talent. According to W&M’s Chief Human Resources Officer, W&M has not had any difficulties in filling open positions.

It is commendable that W&M has two college-wide leadership development programs. Each year, a total of 24 full-time employees — 12 faculty and 12 staff members, are nominated to the Leadership Initiative program. In addition, once a year, select W&M frontline supervisors, each recommended by his or her immediate supervisor, participate in the Supervisors Institute. These two programs provide W&M employees who have shown leadership potential with an opportunity to enhance their leadership and management skills.

### ***Risk Area 4 – Indicators or Opportunities for Fraud, Waste, or Abuse***

<b><i>Objective</i></b>	<b><i>Was Objective Met?</i></b>
Determine if there are indicators or opportunities for fraud, waste, or abuse in the areas reviewed.	Yes

Through interviews with management of W&M, OSIG performed the following procedures for Procurement, STEM, and Succession Planning:

- Identified risks associated with fraud, waste, or abuse;
- Identified possible symptoms or indicators of fraud; and
- Identified existing preventive and/or detective controls that could lower the risk of fraud.

OSIG also performed an analysis of data and reviewed information provided by W&M relating to Procurement, STEM, and Succession Planning for any symptoms or indicators of fraud.

No symptoms or indicators of fraud were noted.