

UCSB Audit and Advisory Services

Internal Audit Report

UCSB Procurement Gateway Post-Implementation Review

February 10, 2014

Performed by: Ronan O'Shea, Protiviti Jason Brucker, Protiviti Scott Nakamura, Protiviti Joe Murrell, Protiviti Dominic Zumbo, Protiviti Antonio Manas-Melendez, Senior Auditor

Approved by: Robert Tarsia, Director

Report No. 08-14-0001

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AUDIT AND ADVISORY SERVICES SANTA BARBARA, CALIFORNIA 93106-5140 Tel: (805) 893-2829 Fax: (805) 893-5423

February 10, 2014

To: Jim Corkill, Director and Controller Business and Financial Services

Re: UCSB Procurement Gateway: Post-Implementation Review Audit Report No. 08-14-0001

As part of the 2013-14 annual audit services plan, Audit and Advisory Services conducted a Post-Implementation Review of the University of California, Santa Barbara (UCSB) Procurement Gateway. The purpose of the project was to assess the new campus e-procurement system, as implemented, and make recommendations concerning the correction of any adverse issues identified.

The first objective of this review was completion of a risk assessment to identify and prioritize concerns and risks related to Gateway implementation; this assessment was used to select risk areas to address in substantive fieldwork procedures and testing. The risk areas selected for detailed work included:

- Transactions paid through Gateway.
- Vendor maintenance and coordination with Accounts Payable.
- The contract between UCSB and SciQuest, UCSB's e-procurement partner.

Our review found that the implementation of Gateway is generally considered a success and that the system is, for the most part, operating as planned. Senior management has expressed their appreciation for a successful e-procurement implementation that will result in more efficient and effective campus procurement processes. Looking forward, there are opportunities for improvements in Gateway oversight and governance, organizational readiness and training, vendor management, and the terms of the contract with SciQuest. There may also be opportunities to leverage the lessons learned on the Gateway implementation to future system implementation projects.

Detailed observations and management corrective actions are included in the following sections of the report. The management corrective actions provided indicate that each audit observation was given thoughtful consideration and positive measures have been taken or planned to implement the management corrective actions. The cooperation and assistance provided by Administrative Services, Student Affairs, and UCSB departmental personnel during the review was sincerely appreciated. If you have any questions, please feel free to contact me.

Jim Corkill, Director and Controller February 10, 2014 2 of 2

Respectfully submitted,

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Robert Tarsia Director Audit and Advisory Services

Enclosure

cc: Chancellor Henry Yang

Marc Fisher, Senior Associate Vice Chancellor Administrative Services Pam Lombardo, Acting Associate Vice Chancellor Administrative Services UCSB Audit Committee Sheryl Vacca, Senior Vice President and Chief Compliance and Audit Officer Leslie Griffin, Associate Director, Business and Financial Services Jacob Godfrey, Associate Director and Materiel Manager, Business and Financial Services Brian Richard, Director, Enterprise Planning and Architecture, Enterprise Technology Services

PURPOSE

The primary purpose of this review was to conduct a post-implementation assessment of the University of California, Santa Barbara (UCSB) Procurement Gateway (Gateway) to assess the system as implemented and make recommendations concerning the correction of any adverse issues identified. This assessment is part of UCSB's 2013-14 annual audit services plan.

SCOPE, OBJECTIVES AND METHODOLOGY

The scope of the review was limited to existing Gateway documentation at August 31, 2013, and Gateway transactions between May 1, 2013, and August 31, 2013.

The project objectives included:

- Completion of a Project Risk Assessment This assessment was conducted to identify and prioritize concerns and risks related to Gateway implementation; the assessment was used to select risk areas to address in substantive fieldwork procedures and testing, and to provide a risk scorecard for ongoing monitoring of Gateway risks by Audit and Advisory Services.
- Substantive Audit Objectives The substantive audit objectives, selected based on the project risk assessment, included determining whether:
 - Gateway transactions are appropriate (e.g., purchase order cutoff procedures were followed, system settings are enforced and are in alignment with policy, and transactions are in compliance with federal regulatory requirements).
 - The contract between UCSB and SciQuest includes all appropriate terms and conditions to protect the University's interests.
 - Appropriate segregation of duties in vendor management is maintained and enforced.

To accomplish our objectives, we:

- Reviewed and analyzed University of California (UC) policies and procedures related to system development and security, including Business and Finance Bulletin IS-10, *Systems Development and Maintenance Standards* (BFB IS-10); and Business and Finance Bulletin IS-3, *Electronic Information Security* (BFB IS-3).
- Reviewed and analyzed select Gateway documentation, including:
 - Project Charter.
 - Project management plans (scope, schedule, work breakdown structure, budget, quality management).
 - o Business cases.
 - o Requirements.
 - Testing strategy, plans, & results.
 - Data migration plans.
 - End user training documentation.
 - Issues/defects logs.
 - Go-live signoff and approval documents.
 - Business process documentation for purchasing.

- o Gateway intranet site.
- Gateway transactions.
- UCSB's contract with SciQuest (the firm selected as UCSB's Gateway implementation partner).
- Conducted interviews with Gateway team members and stakeholders to gain an understanding of the current state of the Gateway system and to identify concerns and risk areas; we also had follow-up discussions to validate the prioritization of concerns and risk areas.
- Interviewed campus stakeholders involved with and impacted by Gateway (the Appendix to this report includes a listing of individuals interviewed).
- Performed substantive reviews and testing for selected areas, including collecting, testing, and analyzing relevant evidence, and validating results with stakeholders and team members (as needed). To verify that the system is operating appropriately, we judgmentally selected:
 - 40 transactions processed between May 1, 2013, and August 31, 2013. For each sample transaction, we determined whether the:
 - Transaction amount and quantity received agrees to the amount and quantity UCSB was invoiced.
 - Purchase requisition had two employee approvals.
 - Five transactions including restricted items and determined whether:
 - Two department approvals were obtained on the purchase requisition.
 - Additional required approvals were obtained (e.g., Purchasing).
 - Four transactions from the legacy accounts payable system, and verified that each transaction was processed in the correct system (e.g., not required to be processed via Gateway).
 - One purchase order to verify that the check prepared for the vendor was for the correct amount.

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing.

BACKGROUND

According to the Business and Financial Services Associate Director and Materiel Manager, the estimated spend on goods and services for the UC system is approximately \$5 billion annually, and annual UCSB purchasing volume exceeds \$80 million; the supporting supply chain is large and complex. In 2011, UCSB established an eProcurement Collaboration Team to evaluate options for implementing an e-procurement system to leverage the buying power of the UC system and streamline the purchasing process.

Prior to implementation of the Gateway system, UCSB procurement activities were made through multiple coordinating points and processed through a homegrown procurement system comprised of multiple legacy systems.¹ The system was outdated and failed to address the business needs of a growing and increasingly transparent organization. It was generally agreed that the legacy system limited UCSB's ability to efficiently grow by requiring excessive administrative bureaucracy, limiting the cost-effectiveness of procurement, and weakening controls.

¹ The replaced legacy systems include Requisition Express (REX), Purchase Order Tracking System (POTS), and some departmental systems used for tracking requisitions, purchase orders, and receipt of goods and services.

The goals and projected benefits of implementing Gateway included:

- Reducing the acquisition cost of goods and services.
- Reducing requisition and order process cycle times.
- Increasing revenue collected.
- Promoting process workflow and life cycle transparency, so that contract compliance has more visibility.
- Promoting procurement of sustainable products.
- Generating accurate spend data that can be leveraged for additional savings.
- Reducing Purchasing's dependency on campus funds by being self-supporting.

The eProcurement Collaboration Team recommended implementing the Procure-to-Pay solution from SciQuest, a web-based portal and hosted buying service. SciQuest is a leading provider of online procurement systems and currently provides services to over 150 colleges and universities, including Stanford, Harvard, MIT, Cornell, and Yale, as well as several UC campuses - Berkeley, Irvine, Riverside, Santa Cruz, San Diego, and San Francisco. SciQuest was identified as having the ability to provide improvements in procurement functionality, workflow, and efficiency, while reducing costs by directing spending to the highest value contracts and preferred suppliers. Additionally, it was projected that the system would assist buyers with identifying sustainable products.

In August of 2011, the campus contracted with SciQuest to implement the eProcurement system (named UCSB Procurement Gateway), and the system was configured to meet the needs of UCSB. The Gateway software integrates and streamlines the requisition, purchase order, order transmission, invoicing, receiving, and payment process with built in work-flow design, approvals, and reporting functions. Gateway implementation was a collaborative effort between the divisions of Academic Affairs, Student Affairs, and Administrative Services; the implementation was managed by the Purchasing unit of Business and Financial Services. The use of Gateway by campus departments was phased in during a period of approximately 12 months; all departments were required to use the system for the purchase of goods and services starting July 1, 2013. Some departments, such as the Marine Science Institute, were early adopters and began processing their procurements through Gateway as early as the summer of 2012. Future plans for the system include integration with UCSB's new financial system.

The Gateway team in Business and Financial Services has devoted significant effort to training the campus community on the proper use of Gateway. The Gateway Systems Manager and several volunteer Gateway super users provided in-person training with every campus department. The Gateway Systems Manager also provided real-time training and support, including holding special training sessions, and "office hours" for end users to address questions and provide additional instruction. As part of the approved Gateway Governance Plan, the Gateway Systems Manager also assembled a Gateway Users Group that meets monthly. This group provides a campus forum for information sharing, planning, identification of needs, and collaborative assessment of new features for the Gateway system. The group also assesses business processes that support the Gateway system.

Although the Gateway implementation was generally accepted as a success, management recognized there were opportunities for improvement. Management asked Audit and Advisory Services to perform a post-implementation review for Gateway so the results could be leveraged to ensure the continued success of Gateway, and also to identify lessons learned to incorporate into future system implementations.

Table 1 summarizes data for active users, campus departments, number of purchase orders, invoices paid, amounts, and suppliers in Gateway for July 2012 through August 2013.

Table 1	Gateway Utilization: Cumulative Summary					
	July 2012	October 2012	December 2012	March 2013	May 2013	October 2013
Active Users	100	909	1,330	2,000	2,722	3,713
Active Departments	5	47	83	162	192	All Campus Departments ¹
Purchase Orders	103	1,022	2,250	5,292	9,555	29,268
Paid Invoices	62	725	2,085	5,337	9,409	34,938
Suppliers in the System	480	760	994	1,433	1,984	3,083
\$ Volume	\$340K	\$2.2M	\$8.0M	\$14.4M	\$28.2M	\$77.8M

Source: Business and Financial Services

¹ Full campus deployment of Gateway was completed on June 30, 2013.

SUMMARY OPINION

Our review found that the Gateway implementation project is generally considered a success and that the system is generally operating as planned. Although the audit found no critical weaknesses in the areas included in the scope of our review, our work did identify opportunities for improvement in the following areas:

- Gateway Oversight and Governance
- Organizational Readiness and Training
- Vendor Management
- Contract Terms

There may also be opportunities to leverage the lessons learned on the Gateway implementation to future system implementation projects.

Audit observations and management corrective actions are detailed in the remainder of the audit report.

DETAILED OBSERVATIONS AND MANAGEMENT CORRECTIVE ACTIONS

A. Substantive Review Procedures

Our interviews with stakeholders identified the following risks related to how transactions are processed via Gateway:

- Amounts/quantities received did not match the amount/quantity UCSB was invoiced.
- Purchase requisitions did not consistently have the appropriate approvals required (e.g., restricted purchases, non-restricted purchases).
- Transactions were incorrectly processed (e.g., restricted items, transactions not processed via Gateway).
- Checks were processed for amounts different than invoiced amounts.

The results of our substantive review procedures to address these risks indicate that the root cause of the issues appears to be insufficient understanding of the system:

- None of the 40 Gateway transactions selected had received amounts/quantities that were different than the amounts/quantities UCSB was invoiced. However, Accounts Payable indicated it has encountered instances with discrepancies, and it rejects some of these invoices for payment. It appears that better understanding of the system would improve results in this area.
- All 40 Gateway transactions selected had appropriate purchase requisition approvals.
- All five Gateway transactions that included restricted items had appropriate approvals for the purchase requisition and the appropriate additional approvals from required departments. We did note that a Procurement review by the Gateway Systems Manager performed on August 2013 Gateway transactions found that 11 of 28 sample transactions included restricted items for which Gateway did not reflect all appropriate approvals. The Gateway Systems Manager continues to follow up and educate departments on this issue and assist them with appropriate remediation steps.
- Two of four transactions processed for payment via the legacy accounts payable system could have been processed via Gateway. The departments processing these two transactions were either unaware that the transactions should be processed via Gateway or preferred using the legacy system. Additional education and training is needed in both cases to ensure consistent compliance with the UCSB's procurement processes going forward.
- The check prepared for the vendor was correct for the one Gateway transaction for which we performed this test.

A later section of this report covering Organizational Readiness and Training includes suggestions for improving campus understanding of the Gateway system.

B. Gateway Oversight and Governance

1. Adequate Resources

Our interviews with stakeholders identified risks related to ongoing support and commitment to Gateway, now that the system is live. The Administrative Services IT team currently supporting the Gateway system is facing multiple competing priorities, including daily job duties and concurrent projects and initiatives that can impact their effectiveness and ability to appropriately support the system. Additionally, stakeholders expressed concerns that the IT team may not currently have the appropriate resources to support and maintain the system and lead future enhancements.

Another identified resourcing risk is the dependency on the Gateway Systems Manager for the ongoing operational success of the system. There is concern among system stakeholders that the momentum and goodwill created with Gateway implementation could be lost if this individual leaves her position, which could jeopardize the future success and use of Gateway.

Looking forward, to ensure the ongoing success and use of Gateway, UCSB should complete an assessment covering the:

- Technical capabilities, capacity, and availability of IT resources to continuously support the maintenance, operation, and future enhancement of Gateway. Where adequate resources are not available, alternative support strategies should be defined.
- Need for cross-training additional resources to support the Gateway Systems Manager, and possible succession planning.

Management Corrective Actions

Business & Financial Services recognizes that staffing resources are being redirected to support other campus IT projects, which may jeopardize the stability of the Gateway system. This risk was identified during the launch of the Financial System Implementation Project (FSIP), and the former Associate Vice Chancellor, Administrative Services pledged funding to backfill FTEs redirected to support the other IT projects. This funding was cancelled by the Associate Vice Chancellor's office mid-recruitment. Business & Financial Services has redirected this funding request to the Associate Chancellor Budget & Planning. Business & Financial Services has also cross trained the Purchasing & Contracts Manager and the Procurement Coordinator to serve as back-up administrators in the event that the Gateway Systems Manager is over-extended or unavailable.

Business & Financial Services was notified that the newly formed Enterprise Technology Services (ETS) department is scheduled to take on the technical support of Gateway. We have initiated conversations with ETS about system governance and support. ETS considers systems administration, back-end support, and training as all potential in-scope support services they can provide. Business & Financial Services anticipates finalizing the details of the future state support model with ETS by late spring.

Business & Financial Services has also requested that the newly formed UC systemwide e-Center of Excellence (eCOE), which is responsible for SciQuest (Gateway) catalogue management, consider assuming responsibility for campus-level system administration and developing a single instance of SciQuest for use systemwide. Two representatives from the eCOE have been enabled as back-up UCSB Gateway systems administrators and the eCOE is now developing a road map for developing a single instance of SciQuest (Gateway) systemwide.

Business & Financial Services will continue to request funding support for additional support staff, and to coordinate with ETS and the eCOE to firm up plans concerning the future support model for Gateway.

Audit and Advisory Services will follow up on the status of this issue by August 31, 2014.

2. Interfaces

At the time of our audit fieldwork, an inventory of interfaces between Gateway and other systems (e.g., shadow systems, UCPath, new financial system, etc.)², had not been completed. Stakeholders interviewed expressed concern that the impact on other systems was not adequately analyzed or understood during Gateway implementation. The stakeholders also expressed concern that an inventory of interfaces is needed to appropriately determine the impact Gateway will have on other systems the University plans to implement in the future, and to adequately plan for those interfaces. We recommend that UCSB complete an inventory of interfaces between Gateway and other systems used on campus. After completing the inventory and evaluating the interfaces, Audit and Advisory Services may perform a follow-up review to ensure that all relevant interfaces have been identified, similar to a recent project it completed for UCPath.

Management Corrective Actions

The Director, Enterprise Planning and Architecture, Enterprise Technology Services, agrees that UCSB should complete an inventory of interfaces between Gateway and other systems used on campus, and that these interfaces need to be evaluated and planned for. This will be done in conjunction with Phase 2 of the FSIP.

Audit and Advisory Services will follow-up on the status of this issue by October 31, 2014.

C. Organizational Readiness and Training

Our interviews with stakeholders identified areas in which there could have been better or enhanced organizational readiness, change management, and user training approaches. Stakeholders indicated that they did not feel adequately prepared to use Gateway; some stakeholders believed that using Gateway created more work, decreasing the incentive to use the system. As a result, some stakeholders indicated that they created workarounds to avoid using Gateway.

Stakeholders also indicated that the initial training approach using volunteer super users, although very valuable, was not completely effective because not all departments received the appropriate level of training under this model. These departments and end users relied heavily on the real-time training and support provided by the Gateway Systems Manager, as well as the special training sessions and other efforts discussed in the Background Section of the report. Although these efforts are needed to enable and support the system end users, the

² A shadow system is any application or database used for business processes that is not provided and supported centrally. The UCPath project (currently in progress) will result in a single payroll system and a single human resources system across all UC campuses and five medical centers.

Gateway project plan did not properly estimate the level of effort and resources required for these tasks, placing additional, unplanned burden on the Gateway Systems Manager.

To further validate the information provided by the Gateway system stakeholders, we performed the following audit procedures:

- Reviewed the results of a review of Gateway transactions performed by the Gateway Systems Manager (covering transactions from June 1, 2013, through June 30, 2013).
- Independently assessed an additional sample of Gateway transactions (covering the period of May 1, 2013, through August 31, 2013).

The results of this work confirmed that end users require more training and awareness, as demonstrated by the following key examples of improper system use:

- Incorrectly classified goods procured, resulting in inappropriate routing for approvals, omission of required approvals, and requisitions against an invalid vendor blanket purchase order.³
- Improperly utilizing Gateway to incorrectly process certain purchases of goods and services and direct payments, e.g., utilities, travel and entertainment expenses, and independent personal services contracts that should be processed using other systems.

Based on these observations, UCSB should review the organizational readiness, change management, and training plans for other in-process system implementation projects. The project managers and implementation teams should re-evaluate and, as needed, adjust the project plans.

Management Corrective Actions

These issues are in the scope of the work being performed, for FSIP and other new systems, by the Enterprise Planning and Architecture group of Enterprise Technology Services. Audit and Advisory Services has addressed these issues in its audits of the FSIP; the status of the issues will be addressed in the report for our fiscal year 2013-14 FSIP Progress Review Field Follow-up.

D. Vendor Management

Our interviews with stakeholders identified risks related to the vendor management process. When new vendors are added to the Gateway vendor master list, there is currently no process in place to check or validate the vendors against government-issued restricted or debarment lists. Stakeholders also indicated that there is no process in place to periodically review existing vendors on the master vendor list against the same government-issued restricted lists. UCSB could face sanctions, such as debarment as a government contractor or disallowance of costs, if found to be in violation.

Although the campus has other controls in place to ensure compliance, the implementation of an automated procurement system represents an excellent opportunity to efficiently improve controls in this area. UCSB should consider incorporating into the Gateway procurement process a check or validation against government-issued restricted lists; this should apply to

³ Vendor blanket purchase orders are used for continuing purchases of similar items from the same vendor (e.g., office supplies, etc.). This single blanket purchase order allows many invoices to be submitted over a period of time and up to a certain designated amount.

all vendors added to the Gateway master vendor list and for periodic reviews of existing vendors already on the Gateway master list.

Stakeholders also expressed concerns regarding potential inappropriate segregation of duties in the processes for adding, modifying and deleting vendors on the vendor master list. We reviewed a September 2013 list of users who have the ability to add, modify, and delete vendors and found that the users listed were appropriate, and that access was required for the users to perform their job responsibilities.

Management Corrective Actions

Business and Financial Services recognizes that the current vendoring process does not include a step to validate all vendors against government-issued restricted or debarred lists. We instead validate vendors in real time as requisitions are processed, and conduct annual debarment/suspension reviews for vendors with ongoing contracts as required by federal regulations. UCSB's process was recently reviewed and certified by the Office of Naval Research as part of UCSB's regular Contractor Procurement System Review (CPSR) certification audit.

Audit and Advisory Services will promote the automated validation of vendors against government-issued restricted lists as a potential systemwide option, outside the context of this audit.

E. Contract Terms

The contractual arrangement between UCSB and SciQuest is documented in the following documents:

- SciQuest Order Form dated August 31, 2011.
- UCSB purchase order with SciQuest dated September 1, 2011.
- BFB-BUS-43: *Materiel Management*, Exhibit C, Appendix A.

Our review of these documents identified several issues requiring attention to protect UCSB's interests:

- Additional Contractual Protections Neither the UCSB purchase order with SciQuest nor the SciQuest Order Form explicitly states requirements regarding data security, access, confidentiality, and back-ups. Given the importance of the data SciQuest is hosting, there should be additional provisions to protect UCSB. During fieldwork, we asked Purchasing and Accounts Payable personnel if SciQuest offered a report (such as an independent review) that provides clients with assurance that certain controls related to these areas are in place. Neither group was aware if SciQuest offered such a report to its clients; SciQuest's website also does not mention the company offering such a report to clients. The University should consider adding and/or amending the contractual terms and conditions with SciQuest to include provisions that SciQuest implement and/or share with UCSB the appropriate data security protocols in place to protect UCSB data. These protocols may include:
 - Appropriate restrictions on access to UCSB data.
 - Specified, appropriate back-up procedures and processes (including provisions to periodically verify that back-up data can be restored in the event of an emergency).
 - Confidentiality agreements for SciQuest personnel with access to UCSB data.

- Audit Clause The UCSB Purchase Order with SciQuest refers to an audit clause; however, the provisions do not clearly state or indicate the University's right to audit and inspect SciQuest's records. The University should consider updating the audit clause terms to include verbiage indicating that SciQuest:
 - Agrees to maintain and make available to the University accurate books and accounting records related to the work under contract.
 - Will allow the University to audit and examine the books and records.
 - Is subject to records retention requirements similar to the requirements imposed on the University by its federal, state, and other funding sources.

Management Corrective Actions

Business and Financial Services has contacted University of California Office of the President (UCOP) Procurement Services, the owner of the SciQuest contract, about the noted missing contract provisions. UCOP has agreed to work with SciQuest and update the contract to conform to current contract standards.

Audit and Advisory Services will follow up on the status of this issue by August 31, 2014.

Appendix: Individuals Interviewed

Name	Group / Process Team	Home Department	
Ron Hirst	Accounts Payable Team	Administrative Systems PMO	
Asger Pedersen	Accounts Payable Team	Business & Financial Services	
Annette Gonzales	Accounts Payable Team	Business & Financial Services	
Bernice Yost	Accounts Payable Team	Business & Financial Services	
Steve Kriz *	Business Process Team	Business & Financial Services	
Christine Griffin	Business Process Team	Business & Financial Services/ Purchasing	
Pam Lombardo *	Business Process Team (Lead) / Integration Implementation Team/Gateway Advisors (Lead)	Office of the Vice Chancellor for Administrative Services	
Calli Price	Business Process Team/Gateway Advisors	Business & Financial Services/ Purchasing	
Luisa Velez	Business Process Team/Gateway Advisors	Marine Science Institute	
Tedi Tehrani	Business Process Team/Gateway Advisors	Student Information Systems & Technology	
Jim Woods *	Business Process Team/GMC Team (Lead)/Integration	Marine Science Institute	
Jacob Godfrey *	Business Process Team/GMC Team/Gateway Advisors	Business & Financial Services/Purchasing	
Brian Richard	Director	Administrative Systems PMO	
Robert Tarsia	Director	Audit and Advisory Services	
Donna Trimble	Gateway Advisors	Chemistry and Biochemistry	
Maureen Evans	Gateway Advisors	Materials Research Lab	
Lynne Pritchard	Gateway Advisors	Psychological & Brain Sciences	
Laurie Eusey	Gateway Advisors	Institute for Collaborative Biotechnologies	
Tim Schmidt *	Gateway Advisors/Gateway Partners (Lead)	Marine Science Institute	
Sara Bard	Gateway Partners	Mitsubishi Center for Advanced Materials	
Mike Best	Gateway Partners	Mathematics	
Kit Holmlund	Gateway Partners	Chemical Engineering	
Josie Castagnola	Gateway Partners	College of Engineering	
Christine Herman	Gateway Partners	Molecular, Cellular & Developmental Biology	
Lubo Bojilov *	Integration Implementation Team (Lead)	Student Information Systems & Technology	
Jim Corkill *	Steering Committee	Business & Financial Services	
Bill McTague *	Steering Committee (Co-Chair)	Office of the Vice Chancellor for Student Affairs	

* Individuals identified with an asterisk (*) are also members of the Gateway Steering Committee.

Note: Administrative Systems PMO is now the Enterprise Planning and Architecture group of Enterprise Technology Services.