

**Integrity Monitor Report  
Categories 1 and 2**

Integrity Monitor Firm Name: The North Highland Company LLC  
Integrity Monitor Category (1 or 2): Category 2  
Quarter Ending: 12/31/2022  
Expected Engagement End Date: 1/27/2023

**A. General Information**

1. Recovery Program Participant:

**State of New Jersey's, Department of Human Services, ONA  
Division**

2. Federal Funding Source (e.g. CARES, HUD, FEMA, ARPA):

**ARPA**

3. State Funding Source (if applicable):

**None**

4. Deadline for Use of State or Federal Funding by Recovery Program Participant:

**December 31, 2024 – obligation must occur; December 31, 2026,  
all ARPA funds must be liquidated**

5. Accountability Officer:

[Brian Francz]

6. Program(s) under Review/Subject to Engagement:

[The Excluded New Jerseyans Fund]

7. Brief Description, Purpose, and Rationale of Integrity Monitor Project/Program:

This Engagement Query was issued by the Department of the Treasury on behalf of the Department of Human Services ("DHS").

The purpose of this engagement query is to contract for grant management services as described in Section 3.1.1.2 of the RFQ, Category 2 Financial

## **Integrity Monitor Report Categories 1 and 2**

Auditing and Grant Management, to review and adjust DHS's program design for compliance with federal rules, develop policy and training documents, and assist DHS in the engagement of entities to administer the program. These contracted entities will allow DHS to provide cash assistance to residents impacted by the COVID-19 pandemic but not otherwise eligible for federal stimulus or Pandemic (extended) Unemployment Insurance benefits.

8. Amount Allocated to Program(s) under Review/Subject to Engagement:

Current estimate of \$80 million, eligibility determinations are still in process.

9. Amount Expended by Recovery Program Participant to Date on Program(s) under Review/Subject to Engagement:

[As of 12/20/2022, we are projecting that more than \$65,000,000 will be approved by the end of the project.]

10. Amount Provided to Other State or Local Entities:

None

11. Completion Status of Program (e.g. planning phase, application review, post-payment):

[Since the last report, the program has shifted to using ARPA dollars to fund the program. The program closed to the public on February 28, 2022. Over the period of January 1, 2022, through February 28, 2022, the program essentially doubled in size. The Excluded New Jerseyans Fund began as a \$40 million program and is now an \$80 million program. The program has moved to a wind down phase where staff is reviewing the last of the eligible applications, reviewing files for audit purposes, and ramping down temporary staff as their work concludes.

12. Completion Status of Integrity Monitor Engagement:

[Over the course of Q4 2021, it was determined that North Highland was not responsible for conducting CAT 3 level monitoring activities, but as a part of our CAT 2 engagement, we are providing the State with QA/QC level work to avoid fraud, waste, or abuse. With the program extending it's

## **Integrity Monitor Report Categories 1 and 2**

activities, NH has received extensions to continue to assist the Department with integrity monitoring work through Q1 of 2022 and into Q1 of 2023.]

### **B. Monitoring Activities**

13. Description of the services provided to the Recovery Program Participant during the quarter (i.e. activities conducted, such as meetings, document review, staff training, etc.):

a) IM Response

[North Highland has engaged with the DHS to provide technical assistance with the compliance of federal rules, develop policy and training documents, oversee a growing team of NJDHS temporary staff, and assist DHS in the engagement with external vendors (the CBO) that are assisting in working with the individual applicant to complete their applications. North Highland's role is to assist with their training and coordination.]

b) Recovery Program Participant Comments

14. Description of activities to prevent, detect, and remediate waste, fraud, and/or abuse during the quarter:

a) IM Response

At this time, North Highland has responded to requests on policy and process matters that are meant to avoid instances of fraud, waste, or abuse. North Highland has not provided legal advice; instead, North Highland has provided opinions within our role as policy and compliance experts. ]

b) Recovery Program Participant Comments

15. General description of any findings of waste, fraud, or abuse:

a) IM Response

## Integrity Monitor Report Categories 1 and 2

All potential issues have been properly reported.

### b) Recovery Program Participant Comments

## C. Miscellaneous

16. List of hours (by employee) and expenses incurred to perform quarterly integrity monitoring review:

### a) IM Response

The following North Highland team members have billed hours during the final quarter of 2022 (October through December). Not all team members have or will remain on the project.

<b>NH Staff</b>	<b>Grand Total</b>
Brett Woodall	433
Carlin Spink	518
Christopher Jacobs	328
Daryl Brazier	495
Destiny Giordano	471
Devin Mitchell	475
Emily Sherman	160
Greg Martin	132
Jason Pettus	205
Jennifer Pang	446
Jordan McCowan	453
Jorge Erazo	488
Joy Jones	436
Kendelle Rock	446
Laura Copen	418
Maninder Kaur	484
Marlin McClendon	336
Marquita Horne	450
Melody Malek	448
Mercedes Romero	416
Peter Cotterrell	70
Shelley Hayes	490
Tim Shappley	378
<b>Grand Total</b>	<b>8,975</b>

**Integrity Monitor Report  
Categories 1 and 2**

b) Recovery Program Participant Comments

Name of Integrity Monitor: The North Highland Company LLC  
Name of Report Preparer: Jason Pettus  
Signature: *Jason Pettus*  
Date: 1/5/2023