

**Integrity Monitor Report  
Category 3**

Integrity Monitor Firm Name: Vander Weele Group (“VWG”)  
Quarter Ending: 06/30/2022  
Expected Engagement End Date: 09/30/2022

**A. General Info**

1. Recovery Program Participant:

New Jersey Department of Environmental Protection (“NJ DEP”)

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

Coronavirus Aid, Relief, and Economic Security (“CARES”) Act

3. State Funding Source (if applicable):

N/A

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

Round 1 – 5/31/22

Round 2 – 7/30/22

5. Accountability Officer:

[Stephen Matis]

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

[Marine Fisheries CARES Act Assistance Round 1 and Round 2 Programs]

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

[Pursuant to E.O. 166, the Governor’s COVID-19 Compliance and Oversight Taskforce (“Taskforce”) has issued guidelines, which have been updated as of June 2021, regarding the appointment and responsibilities of COVID-19 Oversight Integrity Monitors (“Integrity Monitors”) to help prevent, detect, and remediate inefficiency and malfeasance in the expenditure of COVID-19 Recovery Funds and provide expertise in Program and Process Management Monitoring; Financial Auditing and Grant Management; and Integrity Monitoring/Anti-fraud services.

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For Round 1, NJ DEP entered into a sub-award on October 16, 2020 with the Atlantic States Marine Fisheries Commission ("ASMFC") to provide funds to fishermen or fishery-related businesses directly for an amount not to exceed \$11,247,242.

For Round 2, NJ DEP entered into a sub-award on September 23, 2021 with ASMFC to provide additional funds to fishermen or fishery-related businesses directly for an amount not to exceed \$9,439,080.

An extension was signed on 10/19/21 to extend the program from the original due date of 9/30/21 to 5/31/22.]

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

Round 1 – Not to exceed \$11,247,242

Round 2 – Not to exceed \$9,439,080

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

Round 1 – \$10,945,714

Round 2 – \$3,442,993

10. Amount Provided to Other State or Local Entities:

N/A

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

Round 1 – Post Payment

Round 2 – Application Review and procurement stage

12. Completion Status of Integrity Monitor Engagement:

VWG is on target to complete all assignments and deliverables by the scheduled end date of 9/30/22.

**B. Monitoring Activities**

13. If FEMA funded, brief description of the status of the project worksheet and its support:

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a) IM Response

N/A

b) Recovery Program Participant Comments

[Type Here]

14. 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

During the second quarter of 2022, VWG has:

- i. Selected a sample for testing and worked with NJ DEP to send document request letters for applicants that received funds in Round 1 and Round 2;
- ii. Conducted an interview with NJ DEP to get a program status update as well as discuss New Jersey Office of the State Comptroller's ("NJOSC") report of the Marine Fisheries CARES Act Assistance program;
- iii. Conducted an interview with NJOSC to discuss its review report, its sampling and testing methodology, and its findings for the Marine Fisheries CARES Act Assistance program;
- iv. Updated our audit strategy and methodology based on discussions had with NJDEP and NJOSC;
- v. Read newly acquired procurement and program related documentation.

b) Recovery Program Participant Comments

[Type Here]

15. Description to confirm appropriate data/information has been provided by the Recovery Program Participant and description of activities taken to review the project/program:

a) IM Response

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NJDEP has provided VWG with all information requested. NJDEP has made themselves available for interviews and for follow-up questions upon request and has made available any documentation relevant to the Marine Fisheries CARES Act Assistance program. On behalf of VWG, NJDEP has sent document request letters to applicants selected for sampling in Round 1 and Round 2 and is currently in the process of collecting requested data to ultimately transfer to VWG.

b) Recovery Program Participant Comments

[Type Here]

16. Description of quarterly auditing activities conducted to ensure procurement compliance with terms and conditions of contracts and agreements:

a) IM Response

VWG has received and read documentation surrounding procurement procedures for Round 2. VWG is in the early stages of the review process surrounding procurement and cannot make any further determinations.

b) Recovery Program Participant Comments

[Type Here]

17. If payment documentation in connection with the contract/program has been reviewed, provide description.

a) IM Response

VWG has performed a preliminary review of the disbursement detail that lists all the disbursements issued for Round I and Round 2. Based on the payment detail reports, VWG has made sample selections and is in the process of receiving requested documentation from applicants to perform further testing. VWG reviewed the NJOSC review report and is aware of the NJOSC's selected sample. VWG ensured a sample selection that differs from the NJOSC's.

b) Recovery Program Participant Comments

[Type Here]

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18. Description of quarterly activity to prevent and detect waste, fraud, and/or abuse:

a) IM Response

To date, no explicit measures to prevent or detect fraud, waste, and abuse have been completed.

VWG reviewed the NJOSC review report of the Marine Fisheries CARES Act Assistance program to gain an understanding of the methodology selected and the findings disclosed. VWG selected a sample based on risk and will test for eligibility and determine whether adequate fraud prevention and detection measures were taken by NJDEP.

Based on the NJOSC report and interviews with NJDEP, it appears that application approvals for disbursements were highly reliant on self-certified information provided by applicants. Applicants were required to sign an affidavit stating that all information disclosed was accurate however, the NJOSC review report disclosed that in many instances, this was not the case. VWG is still awaiting requested documentation from applicants to perform testing procedures.

Upon testing, VWG will ensure adequate documentation has been collected, perform additional due diligence on applicants selected for sampling and inquire of NJDEP's processes to identify the areas of where the risk of fraud, waste, or abuse could be high.

b) Recovery Program Participant Comments

[Type Here]

19. Details of any integrity issues/findings, including findings of waste, fraud, and/or abuse:

a) IM Response

Per conversations with NJDEP surrounding the NJOSC report, NJDEP has no intention of following up with applicants to recoup payments that ultimately made applicants "more-than-whole." The NJOSC report recommended that NJDEP, "...review these findings and consult with the Office of the Attorney General, the NOAA, and/or ASMFC to determine appropriate next steps regarding the recoupment and possible reallocation of funds for other eligible purposes." NJDEP stated that, in response to their conversation with both

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ASMFC and NOAA, NJDEP will not look to recoup payments based on the NJOSC report findings as the two agencies did not want funds returned to them. When documentation was requested to confirm that the agencies were not looking to recoup, NJDEP informed the VWG/DeLuca team that there was nothing in writing and that the information was relayed telephonically. However, NJDEP also informed the VWG/DeLuca team that NOAA was currently auditing ASMFC and that perhaps some written guidance might stem from that audit. Additionally, NJDEP stated that it is currently looking to reallocate Round 2 funds as they are left with an excess because of minimal application submissions and lower than expected costs for their “Fisheries Marketing Plan” and for their “Training and Education Plan.”

b) Recovery Program Participant Comments

[Type Here]

20. Details of any other items of note that have occurred in the past quarter:

a) IM Response

[N/A]

b) Recovery Program Participant Comments

[Type Here]

21. Details of any actions taken to remediate waste, fraud, and/or abuse noted in past quarters:

a) IM Response

[N/A]

b) Recovery Program Participant Comments

[Type Here]

**C. Miscellaneous**

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

a) IM Response

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- Joseph DeLuca – 3.25h
- Maribeth Vander Weele – 1.95h
- Steven Pasichow – 0.75h
- Deb Wells – 3.00h
- Kevin Mullins – 15.00h
- Michael Dundas – 59.00h
- Kristin Mokofisi – 9.00h
- Salvatore Ubaldini – 0.50h
- Matthew Gavin – 29.75h
- Artecia Foster – 29.95h
- Gwendolyn Boston – 81.00h
- Linda Ressler – 33.80h

b) Recovery Program Participant Comments

[Type Here]

23. Add any item, issue, or comment not covered in previous sections but deemed pertinent to monitoring program:

a) IM Response

[N/A]

b) Recovery Program Participant Comments

[Type Here]

Name of Integrity Monitor: Vander Weele Group  
Name of Report Preparer: Kevin Mullins  
Signature: [Sign Here]  
Date: 7/15/2022

