

Integrity Monitor Report
Category 3

Integrity Monitor Firm Name: Vander Weele Group^{LLC}
Quarter Ending: 03/31/2026
Expected Engagement End Date: 12/31/2026

A. General Info

1. Recovery Program Participant:

New Jersey Department of Environmental Protection (NJDEP)

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

American Rescue Plan Act (ARPA)

3. State Funding Source (if applicable):

N/A

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

December 31, 2026

5. Accountability Officer:

Stephen Matis

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

Middlesex Reservoir Reclamation Project

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

The State of New Jersey received \$6,244,537,955.50 in Coronavirus State Fiscal Recovery Funds under the *American Rescue Plan Act (ARPA CSFRF)*. The New Jersey Department of Community Affairs is the prime recipient of the *ARPA CSFRF* funding and has passed it through to the NJDEP via a Memorandum of Understanding (MOU), executed on October 30, 2023, and an amendment to that MOU, executed on May 6, 2024. The NJDEP received \$10 million for project work and \$400,000 for administrative costs in *ARPA CSFRF* funding for the Middlesex Reservoir Reclamation Project, with the additional \$20 million added on the amendment to the MOU on May 6, 2024. The funding was allocated as a

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pass-through grant to Union County for the contractual work on this project. A grant agreement between Union County and the NJDEP was executed on November 15, 2024. The work period indicated on this grant agreement is listed as March 03, 2021, through November 30, 2026.

The NJDEP describes ongoing flooding of the Rahway River and its tributaries to have exacerbated critical siltation and sedimentation issues. These issues have impacted the former Middlesex Water/Clark Reservoir (Reservoir), which could lead to irreversible damage and loss of the Reservoir.

Two phases are expected throughout the contractual work, including dredge improvement in Phase One and park development and improvement in Phase Two.

The purpose of this engagement is for the Integrity Monitor (IM) to perform a risk assessment of the project and a retrospective review of the grant agreement and amendment(s) between the NJDEP and Union County to determine the latter's compliance with applicable federal rules, laws, and regulations. Additionally, the IM will review and report on the contracts Union County has procured to ensure its compliance with applicable state and federal procurement regulations and to verify that the associated invoices, change orders, and payments fall within applicable regulations. Furthermore, the integrity monitor will monitor Union County's management of the Reservoir project for indication of fraud, waste, abuse, or mismanagement of the funds.

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

\$30,400,000

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

NJDEP payment to Union County: \$3,980,150.47.

NJDEP administrative costs for staff salary coding: \$9,168.27.

10. Amount Provided to Other State or Local Entities:

Payment to Union County in the amount of \$3,980,150.47.

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

Construction Phase

12. Completion Status of Integrity Monitor Engagement:

Expenditure Review Phase is in process.

B. Monitoring Activities

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

a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

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

- 1.) The IM attended Microsoft Teams meetings with Union County and NJDEP staff on January 27, February 24, and March 31, 2026.
- 2.) The IM requested and received 2025 documentation for expenditures reimbursed to Union County by NJDEP. The IM is reviewing the documentation provided and will request additional documentation as needed.
- 3.) The IM is reviewing Union County's process of documenting expenditures for the NJDEP and will then finalize the review of the grant agreement and amendment.
- 4.) The IM is reviewing the draft report for the procurement review.
- 5.) Union County provided the week look-ahead schedules for 02/12/2026 and 02/19/2026.

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- 6.) On 03/10/2026, the IM requested a schedule/report of all invoices paid with ARPA funds to date. The IM followed up on the status of this request with Union County on 03/23/2026.
- 7.) On 03/21/2026, the IM requested the most recent cost-loaded schedule, which Union County provided on 03/26/2026.
- 8.) The IM, Union County, and the NJDEP discussed the current project delays related to expenditure totals (approximately \$26 million yet to be expended). Union County explained that they recently received approval for a second shift to extend the normal Monday through Friday work schedule into the weekends, as well as until the noise ordinance restrictions of sundown. Additionally, Union County provided an update on construction as of 03/31/2026 that work is progressing with soil being moved in the dredge location. The soil is currently being de-watered to be hauled off site. As the area dries further, removal of soil will begin to pick up, which will increase total expenditure amounts. Full expenditure by the ARPA deadline of December 31, 2026, remains the largest concern for this project.
- 9.) Finalized the monthly report for December 2025.
- 10.) Finalized the fourth quarterly report for 2025.
- 11.) Drafted and finalized the monthly reports for January and February 2026.
- 12.) Drafted the monthly report for March 2026.
- 13.) Drafted the first quarterly report for 2026.

b) Recovery Program Participant Comments

Agree with IM Comments

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

The IM requested and received 2025 documentation for expenditures reimbursed to Union County by NJDEP. The IM is currently reviewing the documentation and will request additional documentation as needed.

b) Recovery Program Participant Comments

Agree with IM Comments

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

a) IM Response

- 1.) The IM is reviewing the draft report for the procurement review.
- 2.) The IM is reviewing Union County's process of documenting expenditures for the NJDEP and will then finalize the review of the grant agreement and amendment.
- 3.) The IM requested and received expenditure documentation that the NJDEP has reimbursed Union County for. The IM is currently reviewing the documentation and will request additional documentation as needed.
- 4.) The IM has suggested additions to the cost-loaded schedule, including plan versus actual expenditure costs, and a running total expenditure percentage. Union County will provide these updates to the CMF to implement into the cost-loaded schedule.

b) Recovery Program Participant Comments

Agree with IM Comments

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

a) IM Response

Due to the amendment to the grant agreement adjusting payment to a reimbursement structure, the IM began sampling expenditure documentation in March 2026.

b) Recovery Program Participant Comments

Agree with IM Comments

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

a) IM Response

The IM is reviewing expenditures from the fourth quarter of 2025 and prior that has been reimbursed by NJDEP to Union County.

b) Recovery Program Participant Comments

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Agree with IM Comments

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

a) IM Response

The IM will continue to monitor expenditure totals throughout the engagement. Per the amendment executed between Union County and the NJDEP, both parties agreed that the Union County will submit monthly expenditures and required documentation, which the NJDEP will process quarterly. The IM is reviewing expenditures from the fourth quarter of 2025 and prior that has been reimbursed by NJDEP to Union County. The IM has not noted findings or concerns of waste, fraud, and/or abuse to date.

b) Recovery Program Participant Comments

Agree with IM Comments

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

a) IM Response

The IM, Union County, and the NJDEP discussed the current project delays related to expenditure totals (approximately \$26 million yet to be expended). Union County explained that they recently received approval for a second shift to extend the normal Monday through Friday work schedule into the weekends, as well as until the noise ordinance restrictions of sundown. Full expenditure by the ARPA deadline of December 31, 2026, remains the largest concern for this project.

b) Recovery Program Participant Comments

Agree with IM Comments

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

a) IM Response

N/A

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b) Recovery Program Participant Comments

N/A

C. Miscellaneous

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

a) IM Response

Dr. Kristen Mokofisi—17.25
Rick Duran—9.95
Sophia Staveris—15.45
Bianca Joseph—65.30
Rene Alaniz—12.50
Katherine Larson—50.60

b) Recovery Program Participant Comments

Hours acknowledged.

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

N/A

Name of Integrity Monitor:	Vander Weele Group ^{LLC}
Name of Report Preparer:	Sophia Staveris
Signature:	<i>Sophia Staveris</i>
Date:	04/10/2026