

**Integrity Monitor Report
Category 3**

Integrity Monitor Firm Name: Vander Weele Group^{LLC}
Quarter Ending: 12/31/2025
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:

Rebuild by Design-Hudson River (RBDH) 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 (CSFRF) under *ARPA*. The RBDH project received \$100 million in *ARPA* CSFRF funding to support the Resist contract, which was awarded to E.E. Cruz & Company, Inc., on July 31, 2023, for \$251,205,588.00 (including the \$100 million from *ARPA* CSFRF). The NJDEP RBDH project received additional funding from the Housing and Urban Development (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) and the Federal Emergency Management Agency (FEMA) Building Resilient Infrastructure and Communities (BRIC) for \$22,500,000.

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The purpose of this engagement is for the integrity monitor (IM) to perform a retrospective review of the procurement process to determine compliance with applicable Federal rules, laws, and regulations. The IM will verify that each invoice, change order, and payment is consistent with all applicable Federal, state, and local laws, and that there is no duplication of benefits, process and payment errors, waste, fraud, abuse, malfeasance, or mismanagement of funds. The IM will also verify that all contract deliverables are provided within acceptable time limits for the duration of the engagement and will review compliance with the *New Jersey Prevailing Wage Act*, *Davis-Bacon Act* (as applicable), Small and Minority/Women-Owned Business Enterprises, and others, as necessary. The IM will also conduct on-site reviews, as needed. If the IM detects weaknesses, gaps, or errors, the IM shall develop recommendations and strategies to ensure compliance with all laws and prevention of associated risks.

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

\$100,000,000.00

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

\$79,306.182.38

10. Amount Provided to Other State or Local Entities:

N/A

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

Construction Phase.

12. Completion Status of Integrity Monitor Engagement:

Construction Review Phase.

B. Monitoring Activities

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

a) IM Response

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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. Attended biweekly internal and NJDEP meetings.
2. Requested and received various invoice documentation from the NJDEP RBDH team. The NJDEP does not gather invoice-specific documentation from the subcontractors, therefore, we request these directly from the construction management firm (CMF).
3. Reviewed the NJDEP RBDH team's uploaded documentation in the protected shared folder and ProjectSolve, including checklists and invoices.
4. Utilized the work paper and checklist to review expenditure documentation provided through each invoice.
5. Updated the status schedule to track the progress of invoice reviews.
6. Ensured that areas of concern documented in the work paper aligned with regulatory requirements for the invoice reviews. Additionally, we reviewed the schedule of values and its associated sub-worksheets.
7. Reviewed quantities meeting minutes and documentation provided demonstrating consistent meetings on project status and the associated values for monthly invoices.
8. Reviewed the documents the NJDEP submitted in connection with the contractor reimbursement requests and noted gaps in the labor cost documentation. We found that some disbursements lacked the necessary time sheets or equivalent non-salary expenditure records to substantiate hours worked, personnel involved, and tasks performed by both the prime contractor and the subcontractor. We have requested additional supporting documentation to clarify and validate the amounts submitted for reimbursement. We have found that one vendor, having completed its work more than a year ago, is missing detailed payroll documentation. We will note this in our final reporting and throughout future quarterly reports.
9. Submitted a final guidance document (version 1.4) to the NJDEP on December 22, 2025 titled, "New Jersey Department of Environmental Protection Guidelines for Grant Programs Supporting Documentation."

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- 10. Drafted monthly reports for October, November, and December 2025.
- 11. Drafted the fourth quarterly report for 2025.

b) Recovery Program Participant Comments

DEP agrees 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

Requesting invoice documentation for each monthly invoice period.

b) Recovery Program Participant Comments

DEP agrees with IM comments

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

a) IM Response

Reviewing procurement documentation, including contracts with the CMF involved in the project, to ensure the program follows applicable regulations.

b) Recovery Program Participant Comments

DEP agrees with IM comments

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

a) IM Response

We have received invoices and other documentation, including receipts and NJDEP RBDH checklists, to support our review. Some vendor-specific documentation has been difficult for the CMF to gather. However, the guidance document should help to reduce the administrative strain on the requirements placed on each applicable party (the NJDEP, subcontractors, etc.).

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b) Recovery Program Participant Comments

DEP agrees with IM comments

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

a) IM Response

We have reviewed invoice-specific documentation the CMF submitted to the NJDEP to support the project, including project guidance documents. However, minimal documentation related to the subcontractor-specific costs and invoice exists. As such, we drafted and finalized a guidance document, which we provided to the NJDEP on December 22, 2025, to support their ability to gather and maintain necessary contractor and subcontractor documentation.

We have not yet noted instances of waste, fraud, and/or abuse. We will note our findings in our monthly, quarterly, and final reporting throughout the engagement. As we move through the Review Phase, we will support the prevention and detection of waste, fraud, and/or abuse.

b) Recovery Program Participant Comments

DEP agrees with IM comments

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

a) IM Response

As we await subcontractor-specific expenditure documentation, we have not yet detected findings of waste, fraud, and/or abuse. However, this may change as we review invoices and subsequent expenditures. If we note instances of waste, fraud, and/or abuse, we will document them in our monthly and quarterly reporting. It is, however, a growing concern that the CMF may not be able to gather adequate documentation related to subcontractor expenditures.

b) Recovery Program Participant Comments

DEP agrees with IM comments

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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

N/A

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

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—18.25

Rick Duran—10.40

Sophia Staveris—11.70

Bianca Joseph—21.75

Cassy Good—28.25

Sydney Long—2.75

b) Recovery Program Participant Comments

DEP agrees with IM comments

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

a) IM Response

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N/A

b) Recovery Program Participant Comments

N/A

Name of Integrity Monitor:
Name of Report Preparer:

Vander Weele Group^{LLC}
Bianca Joseph

A handwritten signature in black ink on a light gray rectangular background. The signature appears to be 'BJ' or similar initials.

Signature:
Date:

1/13/2025