

**Integrity Monitor Report  
Category 3**

Integrity Monitor Firm Name: Vander Weele Group <sup>LLC</sup>  
Quarter Ending: 3/31/2024  
Expected Engagement End Date: 6/30/2024

**A. General Info**

1. Recovery Program Participant:

NJ Department of Education, Additional or Compensatory Special Education and Related Services to Students with Disabilities (ACSERS))

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

*American Rescue Plan Act (ARPA)*

3. State Funding Source (if applicable):

American Rescue Plan State Fiscal Recovery Fund

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

June 30, 2024

5. Accountability Officer:

Amanda Schultz

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

Program and Performance Monitoring, Financial Monitoring and Grant Management, and Anti-Fraud Monitoring for COVID-19 Recovery Funds and Programs specific to ACSERS.

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

Purpose is to collaborate with the NJDOE to develop measures that will help to prevent, detect, and remediate inefficiency and malfeasance in the expenditure of COVID-19 Recovery Funds and to provide expertise in Program and Process Management Auditing, Financial Auditing and Grant Management, and Integrity Monitoring/Anti-Fraud services.

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

The Monitoring Plan covers approximately \$200 million in State Fiscal Recovery Funds appropriated to the State of New Jersey over the next three school years.

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

The amount expended to date totals \$91,206,905.58.

10. Amount Provided to Other State or Local Entities:

The amount provided to school districts to date totals \$90,921,438.05.

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

The ACSERS program monitoring process is currently in the monitoring phase of the district reviews. Review of the first round of ACSERS expenditures, covering fiscal years 2021 and 2022, was completed in September of 2023. Review of the second round of funding was scheduled to begin during the last quarter of 2023; however, funding of those related expenditures is not yet finalized. We will continue to monitor the status of payments and will begin our review of expenditures once those payments are finalized by the NJ Department of Community Affairs.

12. Completion Status of Integrity Monitor Engagement:

The ACSERS program monitoring process is currently in the monitoring phase of the district reviews. Review of the first round of funding, covering fiscal years 2021 and 2022, was completed in September of 2023. Review of the next round of funding was scheduled to begin during the last quarter of 2023; however, this has been moved forward to the first quarter of 2024. The expectation is to complete the monitoring review for the second round of funding by the second quarter of 2024; however, to account for the delay in starting the second round of reviews, an extension was requested and granted with potential review completion by the third quarter of 2024.

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**B. Monitoring Activities**

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

a) IM Response

No FEMA funds associated with ACSERS.

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. Conducted bi-weekly follow-up meetings to discuss various inquiries and items that primarily relate to the next phase of the project and the second round of funding for the ACSERS program.

2. Commenced the second round of the review process for the districts' comparative risk assessment. This follows a brief pause in the ACSERS review as we waited to receive the listing of school districts for review.

3. NJDOE provided VWG with the listing of all districts that received funding for ACSERS-related expenditure for the second round of funding (provided on 3/19/2024). As payments to the district are not yet finalized, the list contains the districts that received funding with no expenditure amounts included. VWG commenced drafting the comparative risk assessment without these expenditures, pulling in the necessary district information such as demographics and contact information. We will confirm the timing of the receipt for the expenditures and include once received; however, we can move forward with our risk assessment based on other factors noted within the demographic's data.

4. Completed Monthly for March and Quarterly reporting for the

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first quarter of 2024.

b) Recovery Program Participant Comments

NDOE agrees with the above.

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

We confirm that we have received the requested data/information regarding the administration of the ACSERS program from NJDOE and from the various districts being reviewed.

Noted from our prior quarters review, NJDOE provided VWG with a listing of districts that received ACSERS funding. Using various risk assessment indicators, VWG selected a sample of districts for review. NJDOE provided the expenditure totals for each of the selected districts. For our process, we coordinated initial meetings with each of the districts to go over their internal control processes and procedures and request any preliminary information. Based on the information gathered from the initial meetings, we submitted to each district a more detailed request list consisting of various documentation, inclusive of contracts, purchase orders, invoices, and disbursement records that will aid in our validation of the individual expenditures being reviewed.

Review of the first round of funding, covering FY 21 and FY 22, has been completed.

There are two rounds of funding for the ACSERS program. We noted our process for the first round of reviews. The second round of reviews, which is currently in the initial phase (comparative risk assessment for the districts), will follow a similar approach, consisting of an initial meeting and interview with each district selected, followed by the applicable documentation requests.

b) Recovery Program Participant Comments

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N/A

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

a) IM Response

Review of the first round of ACSERS expenditures, covering fiscal years 2021 and 2022, was completed in September of 2023. Commenced the second-round review of ACSERS funding following a brief pause as we awaited the listing of school districts.

VWG was provided with the listing of all districts that received funding for ACSERS related expenditure for the second round of funding. As payments to the district are not yet finalized, the list contains the districts that received funding with no expenditure amounts included.

We are in the initial stages of the comparative risk assessment process based on the listing received and will move on to the monitoring phase once that process is complete. Like the first round of reviews, the monitoring phase for the second round will consist of reviewing procurement documentation (i.e. review of contracts, specifically tuition and vendor contracts to ensure that the costs noted within these contracts tie back to what was submitted via the homeroom applications).

b) Recovery Program Participant Comments

N/A

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

a) IM Response

Review of the payment documentation involved comparing the amount provided from NJDOE to the source documents provided from the districts (purchase order, invoice, receipts, etc.), identifying discrepancies noted, and communicating those variances to the districts for resolution, as well as communicating to NJDOE any unresolved issues that may arise to the level of a finding.

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b) Recovery Program Participant Comments

N/A

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

a) IM Response

1. Quarterly activities to prevent and detect waste, fraud, and/or abuse include, but are not limited to, discussions over any potential fraud, updated controls that may exist to detect and prevent fraud via review of updated control documentation provided, requests and analysis of applicable documentation, follow-up inquiries, and, if applicable, interviews.
  
2. Review of the first round of ACSERS expenditures, covering fiscal year 2021 and 2022, was completed in September of 2023, with the second round of funding currently in the initial planning phase (comparative risk assessment of the districts).

To date, our tasks have not uncovered any evidence of waste, fraud, and/or abuse. We will continue performing substantive procedures and data analytics as we go through our monitoring process/district reviews to determine the effectiveness of controls and procedures in place to prevent and detect waste, fraud, and/or abuse.

b) Recovery Program Participant Comments

N/A

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

a) IM Response

During our first round of review of the districts selected, we identified findings that are primarily related to improper segregation of the

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ACSERS funds. We noted that the general fund code is being inaccurately used to record ACSERS funds instead of the account code specific to ACSERS noted within the Process Manual. We have also identified instances where the total costs submitted were higher than the supporting documents provided.

For each instance of a finding and/or questioned cost, VWG provided a corrective action recommendation within our reporting for each district. Overall questioned costs for fiscal year 2021 and 2022 reviews totaled \$13,916.66.

We are currently in the initial planning phase (comparative risk assessment of the districts) for the second round of funding and will provide an update on any integrity issues/findings as we commence our next round of district reviews.

b) Recovery Program Participant Comments

N/A

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

None were noted in our prior quarter reporting.

b) Recovery Program Participant Comments

N/A

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**C. Miscellaneous**

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

a) IM Response

Dr. Kristen Mokofisi – 33.2  
Richard Palmer – 22.5  
Artecia Foster – 1.75  
Rene Alaniz – 102.75  
Sydney Long – 8.85

b) Recovery Program Participant Comments

N/A

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 <sup>LLC</sup>  
Name of Report Preparer: [Richard Palmer]

Signature: *Richard Palmer* □

Date: 3/28/2024