

**Integrity Monitor Report
Category 3**

Integrity Monitor Firm Name: Vander Weele Group^{LLC}
Quarter Ending: 06/30/2025
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 *ARP* CSFRF funding to support the Resist contract, which was awarded to E.E. Cruz & Company, Inc., on July 31, 2023, in the amount of \$255,398,711.76. The NJDEP RBDH project received additional funding from the Housing and Urban Development (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) in the amount of \$132,898,711.76 and the Federal Emergency Management Agency (FEMA) Building Resilient Infrastructure and Communities (BRIC) in the amount of \$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:

\$62,937,062.91

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 our requests go directly to the construction management firm (CMF). However, the CMF is having difficulty gathering invoice specific documentation to substantiate the costs. We are continuing to provide best practice recommendations to adjust this document gathering moving forward. With some subcontractors having completed its portion of the work over a year ago, missing documentation may be a growing concern related to this project.
3. Participated in the training for ProjectSolve, which serves as a repository for the backup documentation related to each invoice.
4. Reviewed the NJDEP RBDH team's uploaded documentation in Microsoft OneDrive and ProjectSolve, including checklists and invoices, and updated the work paper monitoring tools and
5. Utilized the work paper and checklist to review various expenditure documentation provided through each invoice.
6. Began drafting a methodology report for the invoice review process.
7. Updated the status schedule to track the progress of invoice reviews.
8. Attended the contractor's weekly project completion meeting, which established values to be charged on the monthly invoice. Ensured all reviewed items are allowable and fall within applicable Federal and state regulations.
9. Developed a robust document request list for Invoices 10, 12, and 13.
10. Ensured that areas of concern documented in the work paper aligned with regulatory requirements for the invoice reviews.
11. Attended several quantities meetings that demonstrated how the field personnel at E.E. Cruz & Company, Inc. provide an assessment of weekly updates and their associated values for monthly invoices.
12. Reviewed the schedule of values and its associated sub-worksheets.

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- 13. Created notes on the condition of the area.
- 14. Requested and received an updated status on the projected expenditures the NJDEP sent to the New Jersey Department of Community Affairs (NJDEP).
- 15. Drafted monthly reports for April, May, and June 2025.
- 16. Drafted the second quarterly report for 2025.

b) Recovery Program Participant Comments

Agree with IM Response

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

Currently requesting invoice documentation for each monthly invoice period.

b) Recovery Program Participant Comments

Working on providing documentation for requested invoices

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

a) IM Response

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

b) Recovery Program Participant Comments

Agree with IM Response

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

a) IM Response

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We have received invoices and other documentation, including receipts and NJDEP RBDH checklists to support our review. However, the majority of subcontractor specific documentation has been difficult for the CMF to locate. Additionally, the NJDEP updated the NJDCA, stating the following: “Construction is ongoing with more than half of the ARP funds expended. Funding should be fully expended by end of calendar 2025.”

b) Recovery Program Participant Comments

Agree with IM Response

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

a) IM Response

We have reviewed invoice specific documentation submitted from the CMF to NJDEP to support the project, including project guidance documents. However, there is minimal documentation related to the subcontractor specific costs and invoice. 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 continue to support the prevention and detection of waste, fraud, and/or abuse.

b) Recovery Program Participant Comments

Agree with IM Response

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

a) IM Response

As we are still awaiting subcontractor specific documentation related to expenditures, we have not yet detected findings of waste, fraud, and/or abuse to date. However, this may change as we begin the invoice and subsequent expenditure reviews. 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

We continue to work with the CMF to obtain the required documentation

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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—27.75

Sophia Staveris—137.50

Cassy Good—248.15

Bianca Joseph—34.75

Rick Duran—28.10

Sydney Long—0.75

b) Recovery Program Participant Comments

Agree with IM Hours

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

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a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

Name of Integrity Monitor:

Vander Weele Group^{LLC}

Name of Report Preparer:

Bianca Joseph

A handwritten signature in black ink on a light gray rectangular background. The signature is stylized and appears to be the initials 'BJ'.

Signature:

Date:

07/11/2025