

**Integrity Monitor Report  
Category 3**

Integrity Monitor Firm Name: Vander Weele Group<sup>LLC</sup>  
Quarter Ending: 3/31/2024  
Expected Engagement End Date: 12/31/2024

**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):

Coronavirus State Fiscal Recovery Fund (CSFRF)

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 CSFRF Funds under ARPA. The entirety of the \$100 million ARP CSFRF funding will be used 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. Additional funding for this contract will be provided by HUD CDBG-DR in

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the amount of \$132,898,711.76 and FEMA BRIC in the amount of \$22,500,000.

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, and within acceptable time limits for the duration of the engagement, and review compliance with *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 weaknesses, gaps, or errors are detected, 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:

\$1,942,363.00

10. Amount Provided to Other State or Local Entities:

N/A

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

Planning Phase

12. Completion Status of Integrity Monitor Engagement:

Planning and Preparation Phase

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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

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.) Drafted preliminary work plan.
- 2.) Drafted agenda for kickoff meeting.
- 3.) Scheduled kickoff meeting.
- 4.) Attended bi-weekly internal Vander Weele Group (VWG) meetings.
- 5.) Attended bi-weekly VWG and DEP meetings.
- 6.) Submitted document request list to DEP.
- 7.) Created Risk Assessment draft.
- 8.) Completed draft monthly report.

b) Recovery Program Participant Comments

[Agree w/ 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

During the kickoff meeting, the IM requested that the NJDEP provide the previously completed risk assessment via the SharePoint drive.

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The IM created a SharePoint drive and provided a link to NJDEP for ease of document submission.

b) Recovery Program Participant Comments

[Agree w/ IM Comments]

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

a) IM Response

As we are currently in the beginning stages of this integrity monitor engagement, we have not requested project-specific documentation. However, the NJDEP previously completed an overall risk assessment, which will be provided to the IM for review. The IM will request additional documentation for review and will complete the risk assessment within Quarter 1 of 2024.

b) Recovery Program Participant Comments

[Agree w/ IM Comments]

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

a) IM Response

N/A

b) Recovery Program Participant Comments

[N/A]

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

a) IM Response

N/A

b) Recovery Program Participant Comments

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[N/A]

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

a) IM Response

As the IM is currently in the beginning stages of the monitoring engagement, there are no findings of waste, fraud, and/or abuse to date.

b) Recovery Program Participant Comments

[Agree w/ IM Comments]

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:

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a) IM Response

Maribeth Vander Weele – 8.15  
Dr. Kristen Mokofisi – 20.15  
Sophia Staveris – 2.25  
Rick Duran – 36.05  
Sydney Long – 2.75  
Cassy Good – 25.60  
Bianca Joseph – 6.50

b) Recovery Program Participant Comments

Hours to be provided by IM.

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: Bianca Joseph

Signature:



Date: 3/31/2024