

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:

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

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Communities (BRIC) for \$22,500,000. An additional \$2 million allocation increased the full *ARPA* allocation to \$102 million.

The purpose of this engagement is for the Integrity Monitor (IM) to retrospectively review 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 recommend strategies to ensure compliance with all laws and prevent associated risks.

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

\$102,000,000.00

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

\$94,958,003.16

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

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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. Attended internal meetings on 01/07/2026, 01/14/2026, 02/04/2026, 03/04/2026, and 03/18/2026 and NJDEP meetings on 02/04/2026 and 03/04/2026.
2. Requested and received invoice support for invoices 10, 11, 14, 15, 19, 20, 21, 24, 25, and 26 from the NJDEP RBDH team. As NJDEP does not collect subcontractor-level invoice documentation, all related support is requested directly from the construction management firm (CMF).
3. Performed a comprehensive review of documentation provided by the NJDEP RBDH team, including checklists, task orders, work orders, invoices, located within the protected shared folder and ProjectSolve.
4. Maintained and updated the Master Status Schedule for invoices currently under review, documenting progress and capturing outstanding documentation required from the RBDH team.
5. Reviewed workpapers to ensure identified concerns aligned with regulatory requirements for invoice reviews and evaluated the schedule of values along with its related sub-worksheets.
6. Received weekly Quantity Report and quantities meeting minutes, supporting NJDEP RBDH and CMF teams consistent communications on project status and the associated values for monthly invoices.
7. Reviewed documentation submitted by NJDEP in support of contractor reimbursement requests and identified gaps in labor cost documentation. As previously reported, certain vendors continue to provide insufficient timesheet and payroll records to substantiate hours worked, personnel involved, and tasks performed by both the prime contractor and subcontractors. Additional supporting documentation has been requested to validate submitted reimbursement amounts. One vendor, whose work

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was completed over a year ago, is missing detailed payroll documentation. This matter will continue to be noted in final reporting and future quarterly reports.

8. Finalized and sent the final guidance document, titled, “New Jersey Department of Environmental Protection Guidelines for Grant Programs Supporting Documentation,” to the NJDEP on February 26, 2026.
9. Drafted monthly reports for January, February, and March 2026.
10. Drafted the first quarterly report for 2026.

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

Requesting invoice documentation for each monthly invoice period.

b) Recovery Program Participant Comments

Agree with IM Response

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

a) IM Response

Reviewing invoices to ensure they adhere to 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. 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.). We are currently reviewing a selected sample of expenditures on each invoice submitted monthly.

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, including project guidance, the CMF submitted to the NJDEP to support the project. However, minimal documentation related to the subcontractor-specific costs and invoice is available due to the structure of the contract. To aid the contractor and subcontractors in substantiating costs, we drafted and finalized a guidance document, which we provided to the NJDEP on December 22, 2025, to support its 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

Agree with IM Response

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

a) IM Response

While awaiting subcontractor-specific expenditure documentation, no instances of waste, fraud, or abuse have been identified to date. This assessment remains subject to change as additional invoices and expenditures

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are reviewed. Any identified issues will be documented in monthly and quarterly reports. However, there is an increasing concern that the CMF may be unable to obtain sufficient supporting documentation related to subcontractor expenditures, particularly as it relates to certified payroll documentation.

b) Recovery Program Participant Comments

Agree with IM Response

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—17.25

Rick Duran—10.90

Sophia Staveris—39.35

Bianca Joseph—31.45

Cassy Good—32.25

Sydney Long—1.50

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b) Recovery Program Participant Comments

Acknowledge hours are TBD

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:

Bianca Joseph



Signature:

Date:

04/13/2026