

**Integrity Monitor Report
Categories 1 and 2**

Integrity Monitor Firm Name: The North Highland Company LLC
Integrity Monitor Category (1 or 2): Category 2
Quarter Ending: 06/30/2022
Expected Engagement End Date: 07/5/2022

A. General Information

1. Recovery Program Participant:

**State of New Jersey's, Department of Human Services, ONA
Division**

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

ARPA

3. State Funding Source (if applicable):

None

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

**December 31, 2024 – obligation must occur; December 31, 2026,
all ARPA funds must be liquidated**

5. Accountability Officer:

[Brian Francz]

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

[The Excluded New Jerseyans Fund]

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

This Engagement Query is issued by the Department of the Treasury on behalf of the Department of Human Services ("DHS").

The purpose of this engagement query is to contract for grant management services as described in Section 3.1.1.2 of the RFQ, Category 2 Financial

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Auditing and Grant Management, to review and adjust DHS's program design for compliance with federal rules, develop policy and training documents, and assist DHS in the engagement of entities to administer the program. These contracted entities will allow DHS to provide cash assistance to residents impacted by the COVID-19 pandemic but not otherwise eligible for federal stimulus or Pandemic (extended) Unemployment Insurance benefits.

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

Current estimate of \$80 million, eligibility determinations are still in process.

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

[As of 7/5/2022, more than \$20,000,000 has been distributed (closed).]

10. Amount Provided to Other State or Local Entities:

None

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

[Since the last report, the program has shifted to using ARPA dollars to fund the program. The program closed to the public on February 28, 2022. Over the period of January 1, 2022, through February 28, 2022, the program essentially doubled in size. The Excluded New Jerseyans Fund began as a \$40 million program and is now an \$80 million program.

12. Completion Status of Integrity Monitor Engagement:

[Over the course of Q4 2021, it was determined that North Highland was not responsible for conducting CAT 3 level monitoring activities, but as a part of our CAT 2 engagement, we are providing the State with QA/QC level work to avoid fraud, waste, or abuse. With the program extending it's activities, NH has received extensions to continue to assist the Department with integrity monitoring work through Q1 of 2022 and into Q2 of 2022.]

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B. Monitoring Activities

13. 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

[North Highland has engaged with the DHS to provide technical assistance with the compliance of federal rules, develop policy and training documents, oversee a growing team of NJDHS temporary staff, and assist DHS in the engagement with external vendors (the CBO) that are assisting in working with the individual applicant to complete their applications. North Highland's role is to assist with their training and coordination.]

b) Recovery Program Participant Comments

Concur with IM response.

14. Description of activities to prevent, detect, and remediate waste, fraud, and/or abuse during the quarter:

a) IM Response

At this time, North Highland has responded to requests on policy and process matters that are meant to avoid instances of fraud, waste, or abuse. North Highland has not provided legal advice; instead, North Highland has provided opinions within our role as policy and compliance experts.]

b) Recovery Program Participant Comments

Concur with IM response.

15. General description of any findings of waste, fraud, or abuse:

a) IM Response

All potential issues have been properly reported.

b) Recovery Program Participant Comments

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Concur with IM response.

C. Miscellaneous

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

a) IM Response

The following North Highland team members have billed hours during the second quarter of 2022 (April through June). Not all team members have or will remain on the project.

Row Labels	Sum of Hours
Brett Woodall	280
Courtney Sullivan	8
Daryl Brazier	380
Destiny Giordano	288
Devin Mitchell	296
Emily Sherman	480
Greg Martin	208
Jason Pettus	277
Jennifer Pang	524
Joanna Redding	170.5
Jordan McCowan	492
Jorge Erazo	304
Laura Copen	452
Maninder Kaur	496
Marquita Horne	460
Melody Malek	488
Mercedes Romero	432
Michael Tellup	510
Pelumi Onabanjo	48
Peter Cotterrell	408
Tuan Nguyen	488
Grand Total	7489.5

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b) Recovery Program Participant Comments

Concur with IM response.

Name of Integrity Monitor: The North Highland Company LLC
Name of Report Preparer: Jason Pettus
Signature: *Jason Pettus*
Date: 07/5/2022