

**Integrity Monitor Report**  
**Category 3**

Integrity Monitor Firm Name: Vander Weele Group<sup>LLC</sup>  
Quarter Ending: 09/30/2025  
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:

Middlesex Reservoir Reclamation 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 under the *American Rescue Plan Act (ARP CSFRF)*. The New Jersey Department of Community Affairs is the prime recipient of the *ARPA* CSFRF funding and has passed it through to the NJDEP via a Memorandum of Understanding (MOU), executed on October 30, 2023, and an amendment to that MOU, executed on May 6, 2024. The NJDEP received \$30 million in *ARPA* CSFRF funding for the Middlesex Reservoir Reclamation Project. Per the engagement query for this integrity monitorship, the \$30 million in funding is

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budgeted as a pass-through grant to Union County for the contractual work on this project.

The NJDEP describes ongoing flooding of the Rahway River and its tributaries to have exacerbated critical siltation and sedimentation issues. These issues have impacted the former Middlesex Water/Clark Reservoir (Reservoir), which could lead to irreversible damage and loss of the Reservoir.

Two phases are expected throughout the contractual work, including dredge improvement in Phase One and park development and improvement in Phase Two.

The purpose of this engagement is to perform a risk assessment and retrospective review of the grant agreement and forthcoming amendment(s) between the NJDEP and Union County to determine the latter's compliance with applicable Federal rules, laws, and regulations. Additionally, the integrity monitor (IM) will review and report on the contracts Union County has procured to ensure its compliance with applicable state and Federal procurement regulations and to verify that the associated invoices, change orders, and payments fall within applicable regulations. Furthermore, the integrity monitor will monitor Union County's management of the Reservoir project for any indicia of fraud, waste, abuse, or mismanagement of the funds.

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

\$30,000,000

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

Payment to Union County in the amount of \$70,568.

NJDEP administrative costs for NJDEP staff salary coding in the amount of \$7,471.65

10. Amount Provided to Other State or Local Entities:

Payment to Union County in the amount of \$70,568.

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

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Review of procurement process and grant agreement.

12. Completion Status of Integrity Monitor Engagement:

In process

**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.) Attended Microsoft Teams meetings with Union County and NJDEP staff on 07/29/2025, 08/26/2025, and 9/30/2025.
- 2.) Received the fully executed contract with Union Paving and Construction from Union County on 7/30/2025.
- 3.) Received the preliminary project schedule from Union Paving and Construction.
- 4.) Attended Microsoft Teams preconstruction meeting on 08/21/2025 with Union County, Union Paving and Construction, and CME Associates.
- 5.) The Notice to Proceed was issued on 09/15/2025. Completion of the project is anticipated to be 660 days after the NTP, which is beyond the 12/31/2026 ARPA deadline for expenditures.
- 6.) Completed the final version of the risk assessment summary and sent it to the NJDEP and Union County on 09/15/2025.
- 7.) Finalizing the draft report for the procurement review.
- 8.) Continued drafting the review of the grant agreement and amendment to the grant agreement between the NJDEP and Union County. The integrity

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monitor will sample Union County's process to document expenditures for the NJDEP, then finalize the review.

- 9.) Drafted and finalized the monthly reports for July and August.
- 10.) Drafted the monthly report for September 2025.
- 11.) Drafted and finalized the second quarterly report for 2025.
- 12.) Drafted the quarterly report for Q3.

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

Union County provided pre-construction meeting minutes held during the month of September 2025.

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

- 1.) We are drafting the report for the procurement review.
- 2.) We are drafting a review of the grant agreement and amendment to the grant agreement between the NJDEP and Union County. We will sample Union County's process to document expenditures for the NJDEP, then finalize the review.

b) Recovery Program Participant Comments

Agree with IM response.

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

a) IM Response

We have just begun the expenditure review process as the Notice to Proceed was just finalized in September. As such, we have not yet received payment documentation in connection with the project.

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 are currently in the process of reviewing procurement documentation and drafting a guidance document to share with the county to support the request for documentation for expenditures under federal funding. This will be provided to the NJDEP for review in the coming weeks.

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

Our primary concern with the project is the current delays on the procurement that have pushed the Notice to Proceed to September 2025. We will continue to monitor expenditure totals throughout the engagement and provide guidance toward full expenditure.

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

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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—26.25

Elizabeth Mackay—60.75

Rick Duran—34.35

Sophia Staveris—30.30

Bianca Joseph—56.65

Rene Alaniz—78.00

Katherine Larson—70.90

Christina Evans—3.50

Sydney Long—5.50

- b) Recovery Program Participant Comments

Agree with IM response.

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

- a) IM Response

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N/A

b) Recovery Program Participant Comments

N/A

Name of Integrity Monitor:	Vander Weele Group <sup>LLC</sup>
Name of Report Preparer:	Sophia Staveris
Signature:	<i>Sophia Staveris</i>
Date:	10/14/2025