

**Integrity Monitor Report
Category 3**

Integrity Monitor Firm Name: Vander Weele Group^{LLC}/Joseph A. DeLuca Advisory and Consulting Services^{LLC}
Quarter Ending: 03/31/2026
Expected Engagement End Date: 12/31/2026

A. General Info

1. Recovery Program Participant:

New Jersey Board of Public Utilities (NJBPU)

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:

Jeannine DeHart (Acting Accountability Officer)

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

1.) School and Small Business Ventilation and Energy Efficiency Verification and Repair (SSB-VEEVR) Program

2.) School and Small Business Noncompliant Plumbing Fixture and Appliance (SSB-NPFA) Program

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

The purpose of this engagement is to review the SSB-VEEVR and SSB-NPFA programs for compliance with the School and Small Business Energy Efficiency Stimulus Program Fund (*P.L. 2021, c. 200*) and the Coronavirus State Fiscal Recovery Fund (CSFRF) Interim and Final Rule, as applicable.

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

The NJBPU earmarked approximately \$180 million for the two programs and an additional \$5 million for administrative expenses.

- Of the \$180 million, \$7,934,801.52 is for the SSB-NPFA (plumbing) program and \$172,065,198.48 is for the SSB-VEEVR (HVAC) program.
- Of the total \$5 million set aside for administrative costs, \$3,778,262.88 is obligated to TRC, the program administrator, and \$1,221,737.12 is obligated to the integrity monitor.

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

Administrative Costs	\$4,355,029.81
Small Business HVAC - Other Community	\$5,005,665.50
Small Business HVAC - Underserved Community	\$1,407,403.11
Small Business Plumbing - Other Community	\$729,004.99
Small Business Plumbing - Underserved Community	\$257,440.05
School HVAC - Other Community	\$85,081,778.75
School HVAC - Underserved Community	\$56,666,441.45
School Plumbing - Other Community	\$3,475,079.35
School Plumbing - Underserved Community	\$3,325,185.78
Total Expended to Date	\$160,303,028.79

10. Amount Provided to Other State or Local Entities:

N/A

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

Subrecipient sampling and application review

12. Completion Status of Integrity Monitor Engagement:

Programmatic review process

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.) Met with the NJBPU via Microsoft Teams on 01/08/2026, 02/12/2026 and 03/12/2026.
- 2.) Per the HVAC and plumbing program manuals applicants were given one year to complete their projects and allowed TRC to grant up to two six-month extensions if justified. Many of the applicants experienced delays in receipt of material for the projects that went beyond the original program extension periods. As a result, the NJBPU decided to grant extensions beyond the original program guidelines. Extension requests beyond the original guidelines must be approved by the NJBPU, rather than TRC.
- 3.) Reviewing projects with delayed milestones and canceled projects that received incentive payments.
- 4.) Sent follow-up questions to TRC on 01/14/2026 regarding site visits conducted in December 2025. TRC responded on 01/15/2026.
- 5.) Canceled site visits planned for projects 68286 and 68287 in December 2025, due to weather-related access issues. The IM is working with TRC to reschedule the site visits.
- 6.) Sent TRC a list of the second set of projects for round 3 testing and requested documentation on 01/08/2026.
- 7.) Provided a list of projects with delayed milestones to TRC on 01/14/2026 and requested that TRC justify cancellations. TRC responded with the requested explanations on 01/22/2026.
- 8.) Sent the HVAC Round 2 draft report to TRC on 01/16/2026 and requested their responses to the findings on the report.
- 9.) Continued the final round of testing and requested additional documentation from TRC after reviewing the initial documentation received.

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- 10.) Followed up with TRC on 02/12/2026 about the status of six projects with delayed milestones. TRC responded on 02/13/2026, stating that it is still waiting for extension requests.
- 11.) Began gathering data for the data analysis portion of the engagement.
- 12.) Received TRC's administrator comments on the HVAC Round 2 Report on 02/20/2026.
- 13.) Sent the final report for HVAC Round 2 to the NJBPU on 03/13/2026.
- 14.) Analyzed the 03/17/2026 milestone report and noted projects with delayed milestones that require further review.
- 15.) Requested that TRC provide the status of twenty-one projects with delayed milestones. TRC provided responses on 03/27/2026, which the IM is reviewing.
- 16.) Finalized and submitted the fourth quarterly report for 2025.
- 17.) Drafted and finalized the monthly reports for January and February 2026.
- 18.) Drafted the monthly report for March 2026.
- 19.) Drafted the quarterly report for the period ending 03/31/2026.

b) Recovery Program Participant Comments

Staff continues to support the IM in its efforts.

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

- a. TRC provided the documentation requested for the final round of testing and has responded to inquiries regarding projects with delayed milestones.
- b. The NJBPU provides the IM with the biweekly HVAC pipelines report. The IM has analyzed these reports and identified twenty-one projects with delayed milestones for further review. Requested that TRC provide the status of twenty-one projects with delayed milestones. TRC provided responses on 03/27/2026, which the IM is in the process of reviewing.

b) Recovery Program Participant Comments

None

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

a) IM Response

1. Monitored HVAC program status and total project expenditure by reviewing biweekly pipeline reports.
2. Reviewing projects with delayed milestones and canceled projects that received incentive payments.
3. Conducting Round 3 of testing.
4. A summary of December 2025 site visits is listed below:

Project #	Project Status	Site Visit Results
67617	Completed 12/31/2024	No findings.
67923	In Process – 2 nd incentive paid 9/26/24	No findings based on site visit; however, we are currently reviewing the reason for the delayed milestone.
68354	Completed 5/3/2024	No findings.
68286	Completed 7/30/2024	Unable to access the site due to weather conditions. Rescheduling the site visit.
68287	Completed 12/10/2024	Unable to access the site due to weather conditions. Rescheduling the site visit.
68177	Canceled 10/14/2024. Incentive paid \$97,500 Applicant decided not to proceed with the project.	Although the project was canceled the IM drove by the location and confirmed its existence.
68273	Canceled 5/8/25 Incentives paid \$307,494	Verified that the business no longer exists at the site.
68211	Completed 03/30/2023	No findings.
68280	Completed 01/24/2024	No findings.
68382	Completed 06/9/2025	No findings.

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b) Recovery Program Participant Comments

None. Staff notes that a member of Staff participated in several site visits with IM staff

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

a) IM Response

Reviewed the 03/17/2026 biweekly HVAC pipeline report and noted that:

- The report contains 152 complete projects.
- Forty-seven of the 152 completed HVAC projects had unexpended funds totaling \$5,423,988.57.
- Unexpended funds from either canceled projects or completed projects whose incentive payments were less than the commitment have gone toward on hold projects and new applications.
- A total of \$1,288,344.25 in incentives was paid for 30 canceled HVAC programs.
- Twenty-eighty HVAC projects are in process. The most recent milestone for five of the projects was in 2023, for six of the projects, it was in 2024 and for 10 of the projects it was 2025 (one in February, one in August, two in October 2025, six in December).

b) Recovery Program Participant Comments

Staff is currently working with the Program Administrator to ensure all projects are completed on time.

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

a) IM Response

Reviewed the 03/17/2026 biweekly HVAC pipeline report and noted that:

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- The report contains 152 complete projects.
- Forty-seven of the 152 completed HVAC projects had unexpended funds totaling \$5,423,988.57.
- Unexpended funds from either canceled projects or completed projects whose incentive payments were less than the commitment have gone toward projects approved but initially put on a wait-list due to full obligation of the project funds.
- A total of \$1,288,344.25 in incentives was paid for 30 canceled HVAC programs.
- Twenty-eighty HVAC projects are in process. The most recent milestone for five of the projects was in 2023, for six of the projects, it was in 2024 and for 10 of the projects it was 2025 (one in February, one in August, two in October 2025, six in December).

b) Recovery Program Participant Comments

Staff is currently working with the Program Administrator to ensure all projects are completed on time.

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

a) IM Response

- The NJBPU is addressing our primary concern of unexpended funds. The NJBPU and the NJDCA are discussing opportunities for expenditure and a plan, developed with TRC, to fully expend funds by the ARPA deadline of 12/31/2026. We will document details of integrity issues/findings, or potential findings of waste, fraud, and/or abuse if they arise.
- As noted in Q4-2025's report, the IM reviewed HVAC project #68273 and found that it was canceled after receiving \$307,494 from the first two incentive payments. The recipient, per TRC, was evicted from the initial site location listed on the program's initial application and had told the contractor and TRC that it had found a new location. The recipient had acquired the new property on 03/01/2024. Since a new location was anticipated, the application was updated to reflect the new location's address. The contractor conducted multiple site visits to the new location and designed and developed the project from 03/06/2024 to 11/01/2024. The contractor logged all work performed, including the time and dollar amounts, as well as all attempts to communicate with the recipient. From 11/06/2024 to 12/03/2024, both the contractor and TRC attempted contact the recipient multiple times but received no

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response. Subsequently, TRC canceled the project. The second incentive, \$299,994, was for materials. Although the contractor canceled the materials order, TRC stated that the advance deposit was not refundable.

In early 2026, the recipient relocated to Medford, New Jersey; however, it has yet to open. The IM is in the process of performing additional research on the recipient and if funds will be questioned costs requiring a reimbursement to the NJBPU.

b) Recovery Program Participant Comments

Staff is currently working with the Program Administrator to ensure all projects are completed on time.

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

We helped the NJBPU in the overall monitoring of program spending to date, including encumbrances and actual expenditures. We will continue to monitor and recommend best practice adjustments to remediate waste, fraud, and /or abuse.

b) Recovery Program Participant Comments

None

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 -1.35
Dr. Kristen Mokofisi -23.50
Kathleen Budrean -.50
Joseph DeLuca -2.25
Sophia Staveris -104.60
Rick Duran -21.35
Bianca Joseph -66.45
Kevin Mullins -16.00
Katherine Larson -83.35

b) Recovery Program Participant Comments

None

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} /Joseph A. DeLuca Advisory and Consulting Services ^{LLC}
Name of Report Preparer:	Sophia Staveris
Signature:	<i>Sophia Staveris</i>
Date:	04/15/2026