

**Integrity Monitor Report  
Category 3**

Integrity Monitor Firm Name: Vander Weele Group<sup>LLC</sup>  
Quarter Ending: 09/30/2024  
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 *ARP* CSFRF funding 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. The NJDEP RBDH project received additional funding

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from the Housing and Urban Development (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) in the amount of \$132,898,711.76 and Federal Emergency Management Agency (FEMA) Building Resilient Infrastructure and Communities (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 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 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:

[\$32,354,992.37]

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 and design phase]

12. Completion Status of Integrity Monitor Engagement:

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[Planning and review phase]

**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 biweekly internal and NJDEP meetings on 07/12/2024, and 07/26/2024, 08/09/2024, 08/23/2024, and 09/06/2024.
- 2.) Finalized the single-entity risk assessment and sent the draft to the NJDEP on 07/25/2024. Updated risk assessment per request from Steve Matis and resent a second version on 07/26/2024.
- 3.) Conducted the initial on-site monitoring visit on 07/01/2024, which included a walkthrough of the construction management firm (CMF) site offices and all active sub-locations. We also met the CMF and NJDEP project staff.
- 4.) Input initial notifications from the on-site visit into the draft single-entity risk assessment.
- 5.) Finalized and sent the final risk assessment reflecting the NJDEP RBDH team's comments on 08/20/2024.
- 6.) Requested and received various invoice documentation from the NJDEP RBDH team.
- 7.) Reviewed NJDEP RBDH team's uploaded documentation, including checklists and invoices, to develop a work paper monitoring tool to ensure all reviewed items are allowable and fall within applicable Federal and state regulations.

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- 8.) Began drafting a monitoring tool and checklist for the monitoring reviews.
- 9.) Began utilizing the workpaper to review expenditures.

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

[Currently in the process of receiving various invoice documentation for each monthly invoice period. We have reviewed the received documentation to date and continue to review documentation as received. ]

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

[Currently reviewing procurement documentation, including contracts with the CMF involved in the project, to ensure that the program is following 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 a few invoices to date and other documentation inclusive of receipts and NJDEP RBDH checklists to support our review. ]

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 various documentation to support the project, including project guidance documents. As we are in the beginning stages of the reviews, no instances of waste, fraud, and/or abuse have been noted. We will note our findings in our monthly and final reporting throughout the engagement. As we move through the review phase, we will continue to 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

[As we are currently in the early stages of monitoring, we have not detected findings of waste, fraud, and/or abuse to date. However, this may change as we begin the invoice and subsequent expenditure reviews. If instances are noted, we will document these instances in our quarterly reporting.]

b) Recovery Program Participant Comments

[Agree with IM Response

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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 – 38.05

Sophia Staveris – 21.80

Cassy Good – 17.25

Bianca Joseph – 102.25

Rick Duran – 62.80

Christina Evans – 5.00

Sydney Long – 3.50

b) Recovery Program Participant Comments

[Hours TBD. The NJDEP will confirm the hours on the final version of the quarterly report.]

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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:  
Name of Report Preparer:

Vander Weele Group<sup>LLC</sup>  
[Bianca Joseph]

Signature:  
Date:

  
[  
09/27/2024