

**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:

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 \$255,398,711.76. The NJDEP RBDH project received additional funding from the Housing and Urban Development (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) for \$132,898,711.76 and the Federal Emergency Management Agency (FEMA) Building Resilient Infrastructure and Communities (BRIC) for \$22,500,000.

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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 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 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:

\$63,205,384.39

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**

13. If FEMA funded, brief description of the status of the project worksheet and its support:

a) IM Response

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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.
2. Requested and received various invoice documentation from the NJDEP RBDH team. NJDEP does not gather invoice-specific documentation from the subcontractors, therefore our requests go directly to the construction management firm (CMF). However, the CMF is having difficulty gathering invoice-specific documentation to substantiate the costs. We are providing best practice recommendations to improve the process of gathering documents. During our review, we have noted that some subcontractors, having completed their work more than a year ago, are missing documentation, which may become a concern for this project.
3. Reviewed the NJDEP RBDH team's uploaded documentation in Microsoft OneDrive and ProjectSolve, including checklists and invoices, and updated the monitoring tools.
4. Utilized the work paper and checklist to review expenditure documentation provided through each invoice.
5. Drafting a methodology report for the invoice review process.
6. Updated the status schedule to track the progress of invoice reviews.
7. Ensured that areas of concern documented in the work paper aligned with regulatory requirements for the invoice reviews. Additionally, we reviewed the schedule of values and its associated sub-worksheets.
8. Attended several quantities meetings that demonstrated how the field personnel for the contractor work on the project. The meeting provides an avenue for receipt of weekly updates and their associated values for monthly invoices.
9. Conducted a training session with RBDH and CMF teams to review the IM-developed compliance matrix work paper tool and examples of guidance documents that may aid the state in gathering adequate documentation from subcontractors in the future. There are currently no guidance documents outside of the initial contractual documentation used by the NJDEP to gather supporting documentation. We discussed our

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ability to support the development of a guidance document to provide to subcontractors who are paid through federal funds.

10. Requested and received an updated status on the projected expenditures the NJDEP sent to the New Jersey Department of Community Affairs (NJDCA).
11. Following request from the NJDEP, we are currently drafting the New Jersey Department of Environmental Protection Guidelines for Grant Programs Supporting Documentation to provide to contractors and subcontractors on their responsibilities in gathering and maintaining applicable documentation for all funds expended under federal grant allocations.
12. Drafted monthly reports for July, August, and September 2025.
13. Drafted the third quarterly report for 2025.

b) Recovery Program Participant Comments

DEP Agrees 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

DEP Agrees 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 procurement documentation, including contracts with the CMF involved in the project, to ensure the program follows applicable regulations.

b) Recovery Program Participant Comments

DEP Agrees 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 received invoices and other documentation, including receipts and NJDEP RBDH checklists, to support our review. However, the majority of subcontractor-specific documentation has been difficult for the CMF to locate. Additionally, the NJDEP updated the NJDCA, stating the following: “Construction is ongoing with more than half of the ARP funds expended. Funding should be fully expended by end of calendar 2025.”

b) Recovery Program Participant Comments

DEP Agrees 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 the CMF submitted to the NJDEP to support the project, including project guidance documents. However, minimal documentation related to the subcontractor-specific costs and invoice exists. We are currently drafting a guidance document to provide to the NJDEP in support of gathering and maintaining 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

DEP Agrees with IM Response

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

a) IM Response

As we await subcontractor-specific expenditure documentation, we have not yet detected findings of waste, fraud, and/or abuse. However, this may change

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as we review invoices and subsequent expenditures. It is, however, a growing concern that the CMF may not be able to gather adequate documentation related to subcontractor expenditures.

b) Recovery Program Participant Comments

DEP Agrees 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—21.50

Sophia Staveris—48.85

Cassy Good—203.00

Bianca Joseph—35.45

Rick Duran—21.80

Sydnie Long—1.75

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b) Recovery Program Participant Comments

DEP acknowledges 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<sup>LLC</sup>

Name of Report Preparer:

Bianca Joseph



Signature:

Date:

10/15/2025