

Integrity Monitor Report
Category 3

Integrity Monitor Firm Name: Vander Weele Group^{LLC}
Quarter Ending: 12/31/2025
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 (ARPA)* 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:

NJDEP payment to Union County: \$3,980,150.47.

Amount expended by Union County to date: \$3,909,582.47.

NJDEP administrative costs for staff salary coding: \$8,247.92

10. Amount Provided to Other State or Local Entities:

Payment to Union County in the amount of \$3,908,150.47.

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

Construction Phase

12. Completion Status of Integrity Monitor Engagement:

In Process – Expenditure 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.) The IM attended Microsoft Teams meetings with Union County and NJDEP staff on October 28, 2025, and November 25, 2025.
- 2.) Dr. Kristen Mokofisi assumed the program manager role for the remainder of the integrity monitor engagement. Previously, Elizabeth Mackay held the position.
- 3.) The IM drafted grant documentation guidance for the NJDEP to review.
- 4.) The IM provided Union County and the NJDEP to a SharePoint site to load document requests to.
- 5.) The second amendment, changing the method of payment from advance payment to reimbursement, was finalized.
- 6.) The IM is reviewing the draft report for the procurement review.
- 7.) The IM is reviewing of the NJDEP and Union County’s grant agreement and amendment. Due to an adjustment in the grant agreement structure,

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we will sample Union County's process of documenting expenditures for the NJDEP in Q1 2026, then finalize the review.

- 8.) Union County sent the first draft of the cost-loaded schedule to the IM on November 13, 2025. The County will update the cost-loaded schedule in the coming months.
- 9.) The IM had finalized and provided the risk assessment and a summary to the County in September. In response, the County requested adjustments. The IM adjusted one statement but did not adjust the final risk ratings. The IM provided a revised summary to the County and sent a revised final risk assessment to the NJDEP on November 14, 2025.
- 10.) The second amendment to the MOU between Union County and NJDEP, changing the method of payment from advance payment to reimbursement, was finalized.
- 11.) The December monthly meeting between the IM, Union County and NJDEP staff was canceled as the NJDEP confirmed that there will be no expenditure approvals until Q1 2026 for reimbursement until early 2026 due to the updated structure from advance payment to reimbursement.
- 12.) Drafted and finalized the monthly reports for October and November 2025.
- 13.) Drafted the monthly report for December 2025.
- 14.) Finalized the third quarterly report for 2025.
- 15.) Drafted the quarterly report for Q4.

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

- 1.) Union County sent the first draft of the cost-loaded schedule to the IM on November 13, 2025. The County will update the cost-loaded schedule in the coming months.
- 2.) Union County provided the following update to the current construction efforts. The preconstruction meeting was held on August 21, 2025. The notice to proceed was issued to the Contractor on September 8, 2025, with an effective date of September 15, 2025. The contractor immediately began preparing submittals, coordinating utilities, and conducting survey work. Additionally, the survey work began laying out the limits of

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disturbance and the silt fence locations. Silt fence and soil erosion measures were installed in conformance with the Soil Erosion and Sediment Control Permit. The lake lowering permit was approved, and lowering began in October. Fish Collection began a few days later, by a subcontractor. To regulate the water levels more effectively, three siphons were installed adjacent to the dam outfall pipe, providing a potential for four lowering methods. Tree Clearing and site prep began along Madison Hill Road, where the roadway and parking areas will ultimately be located. This will also serve as the haul road for the material being removed from the site. The Contractor also began preparing his soil-movement operations and is now using equipment on the lakebed. Although dredge material has not yet begun trucking off, they are currently constructing a low-flow channel along the length of the project and in the flow channels along the sides of the lakes to properly channel flow during upcoming rain events. The contractor has also begun the necessary environmental testing of the dredge material to determine where it will ultimately be hauled off. Additional survey work has continued throughout the project, laying out the proposed walking path.

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.) The IM is reviewing the draft report for the procurement review.
- 2.) The IM is drafting the review of the NJDEP and Union County's grant agreement and amendment. Due to an adjustment in the structure of the grant agreement, we will sample Union County's process of documenting expenditures for the NJDEP in Q1 2026 and finalize the review.

b) Recovery Program Participant Comments

Agree with IM Response

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

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a) IM Response

Due to an adjustment in the structure of the grant agreement, sampling of the expenditure documentation process will occur in Q1 2026.

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

To support the requirement for expenditure documentation requests under federal funding, we drafted a guidance document for Union County, which will be provided to the NJDEP and Union County for use. This was initially estimated to be provided to the County in Q4 of 2026. However, the IM postponed presenting the draft of the guidance document until the amendment was fully executed. We estimate that this will be provided to the County by January 2026.

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

We will continue to monitor expenditure totals throughout the engagement and provide guidance toward full expenditure. As the amendment was recently executed between the County and NJDEP, both parties agreed that the County will continue to submit monthly expenditures and required documentation and the NJDEP will process on a quarterly basis. The NJDEP estimates that the first round of expenditure documentation will be available for the IMs review for the Q4 2025 expenditures toward the end of January or beginning of February 2026. As such, we have not yet noted any findings or concerns of waste, fraud, and/or abuse to date.

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—17.75

Rick Duran—13.65

Sophia Staveris—11.75

Bianca Joseph—54.00

Rene Alaniz—9.0

Katherine Larson—44.50

Sydnie Long—18.50

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:

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a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

Name of Integrity Monitor:	Vander Weele Group ^{LLC}
Name of Report Preparer:	Sophia Staveris
Signature:	<i>Sophia Staveris</i>
Date:	01/12/2026