

**Integrity Monitor Report  
Category 3**

Integrity Monitor Firm Name: Vander Weele Group<sup>LLC</sup>  
Quarter Ending: 03/31/2025  
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:

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 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.

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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, 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:

[\$51,706,106.21]

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:

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

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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 on 01/10/2025, 01/29/2025, 02/12/2025, 02/26/2025, 03/05/2025, 03/07/2025, and 03/26/2025.
2. Requested and received various invoice documentation from the NJDEP RBDH team.
3. Participated in the training for ProjectSolve, which serves as a repository for the backup documentation related to each invoice.
4. Reviewed the NJDEP RBDH team's uploaded documentation in Microsoft One-Drive and ProjectSolve, including checklists and invoices, and updated the work paper monitoring tools and compliance matrix to ensure all reviewed items are allowable and fall within applicable Federal and State regulations.
5. Began utilizing the work paper and checklist to review various expenditure documentation provided through each invoice.
6. Began drafting a methodology report for the invoice review process.
7. Updated the status schedule to track the progress of invoice reviews.
8. Attended the contractor's weekly project completion meeting, which established values to be charged on the monthly invoice. Ensured all reviewed items are allowable and fall within applicable Federal and State regulations.
9. Developed a robust document request list for Invoice 10, 12, and 13.
10. Attended several quantities meetings that demonstrated how the field personnel at E.E. Cruz & Company, Inc. provide an assessment of weekly updates and their associated values for monthly invoices.
11. Reviewed the schedule of values and its associated sub-worksheets.
12. Attended the on-site visit and observed the condition of the area on 03/10/2025.
13. Began creating notes on the condition of the area.

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- 14. Requested from NJDEP and received an updated status on the projected expenditures sent to the New Jersey Department of Community Affairs (NJDCA).
- 15. Drafted monthly reports for January, February, and March 2025.
- 16. Drafted the first quarterly report for 2025.

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 and continue to review the documentation we have received to date.

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 and other documentation to date, including receipts and NJDEP RBDH checklists to support our review. Additionally, the NJDEP sent an updated status to 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

[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, we have not 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 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 we note instances of waste, fraud, and/or abuse, we will document them in our monthly and quarterly reporting.

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 — 51.25

Sophia Staveris — 40.90

Cassy Good — 33.25

Bianca Joseph — 96.70

Rick Duran — 43.25

Sydney Long — 2.50

b) Recovery Program Participant Comments

Agree with IM Hours

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

a) IM Response

[N/A]

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b) Recovery Program Participant Comments

[N/A]

Name of Integrity Monitor:  
Name of Report Preparer:

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

A handwritten signature in black ink on a light gray rectangular background. The signature is cursive and appears to read 'BJ'.

Signature:  
Date:

04/14/2025