

**Integrity Monitor Report
Category 3**

Integrity Monitor Firm Name: CohnReznick

Quarter Ending: 3/31/2026

Expected Engagement End Date: December 31, 2026, or within 3 months following expenditure of available program funds, whichever transpires first.

A. General Info

1. Recovery Program Participant:

New Jersey Board of Public Utilities (NJBPU)

2. Federal Funding Source (e.g., CARES, HUD, FEMA, ARPA):

The U.S. Department of Treasury Coronavirus Capital Projects Fund (CPF) under the 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:

The funds appropriated for this program must be obligated by December 31, 2024, and expended by December 31, 2026.

5. Accountability Officer:

Elena Thaxton

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

New Jersey Broadband Infrastructure Deployment Equity (NJBIDE) Pilot Program

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

To fulfill its obligations under Executive Order (E.O.) 166 regarding the appointment of independent Integrity Oversight Monitors (“Integrity Monitors” or “IOM”) for any New Jersey State Agency receiving \$20 million or more in COVID 19 Recovery funds and per the IOM guidelines, the NJBPU engaged

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CohnReznick (the IM, CR) to perform the Integrity Monitoring services for four multifamily programs.

The purpose of this Integrity Monitoring engagement is to:

Category	Key Activities
Program Oversight & Compliance	Ensure program integrity by verifying applicant eligibility, aligning grant agreements and policies with CPF/NJBIDE requirements, preventing duplication with other broadband initiatives, and restricting fund use to approved deployment activities.
Risk-Based Monitoring	Implement a flexible, risk-based sampling approach that accounts for project size, geographic location, and subrecipient risk to ensure targeted and effective program monitoring.
Financial & Procurement Reviews	Ensure financial and contractual integrity by reviewing ISP/vendor payments, scrutinizing procurement practices, evaluating MOUs for alignment, and testing expenditures for proper documentation and approvals.
Construction Monitoring	Monitor construction projects through on-site visits and detailed reviews of change orders, invoices, and punch list items to ensure progress, quality, and regulatory compliance.
Payroll & Personnel Reviews	Review payroll records and personnel documentation to ensure compliance, eligibility for reimbursement, and transparency in all NJBIDE-funded staffing activities.
Fraud Prevention & Detection	Leverage data analytics, interviews, and validation techniques to detect and prevent fraud, while developing structured reporting procedures and a comprehensive anti-fraud program tailored to broadband deployment risks.
Training & Awareness	Promote program integrity by delivering fraud awareness training and reinforcing ethical conduct through clear reporting mechanisms for staff, contractors, and subrecipients.
Stakeholder Engagement	Engage stakeholders through interviews with BPU staff, contractors, subrecipients, and community members to gather insights on program implementation and effectiveness.
Documentation & Record-Keeping	Engage stakeholders through interviews with BPU staff, contractors, subrecipients, and community members to gather insights on program implementation and effectiveness.

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

NJBIDE: \$52 Million

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

As of 3/31/2026 \$5,885,289.04 has been expended and fully supported. An additional \$380,285.44 has been advanced or has support pending to subrecipients for a total \$6,265,574.48.

10. Amount Provided to Other State or Local Entities:

N/A

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

In progress

12. Completion Status of Integrity Monitor Engagement:

In progress

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:

- Held bi-weekly status calls and evaluated PBC documents provided by NJBPU.
- Held planning sessions and conducted walkthroughs to complete awardee eligibility testing.
- Provided NJBPU with the draft and finalized work plan

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- Drafted additional PBC requests regarding eligibility review and provided them to the client.
- Completed eligibility testing for all program awardees.
- Obtained access to SAGE
- Prepared and submitted the January, February, and March Monthly Report.
- Finalized Q4 2025 report
- Prepared and drafted the Q1 2026 Treasury Report.

b.) Recovery Program Participant Comments

N/A

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

The IM obtained access from NJBPU to the Storm Integrated Recovery Operations and Management System (SIROMS), which serves as the system of record for managing SFRF funds, including tracking expenditures and obligations. The IM periodically reviews uploads organized by each subrecipient and project, including expenditure requests, supporting documentation, and required periodic progress reports. The IM also meets regularly with NJBPU's grant management team to confirm that all grantee information and data are complete and compliant with program requirements.

Additionally, the IM is in the process of obtaining access to System for Administering Grants Electronically (SAGE), NJBPU's grant management system, to further support the review and verification of program expenditures and data.

b) Recovery Program Participant Comments

N/A

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

a) IM Response

N/A

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b) Recovery Program Participant Comments

N/A

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

a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

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

a) IM Response

During this period, IM activities were focused on conducting detailed eligibility reviews of awardees to verify compliance with program requirements and identify potential indicators of fraud, waste, or abuse. IM also held and participated in ongoing discussions with the program team to monitor program status, assess data consistency, and evaluate any anomalies or irregularities that could warrant further review.

b) Recovery Program Participant Comments

N/A

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

a) IM Response

No integrity issues were noted this quarter.

b) Recovery Program Participant Comments

N/A

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20. Details of any other items of note that have occurred in the past quarter:

a) IM Response

Based on regular status calls held with the NJBPU program team throughout the quarter, expenditures to date relative to program progress are within expectations. The program team has indicated that the majority of expenditures are anticipated to be incurred and submitted in Q3 of 2026.

In addition, the program team conducts regular monthly site visits to monitor progress and has confirmed that project advancement aligns with expectations. IM has obtained documentation of these site visits.

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

For the period January 1, 2026, through March 31, 2026, the following individuals have expended a total of 688.4 hours:

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Name:

1. Anna Fomina (0 hours)
2. Julie Mitchell (288.2 hours)
3. Lindsay Calvert (0 hours)
4. Eliane Kabre (3 hours)
5. Nate Kessler (325.7 hours)
6. Ron Frazier (43.5 hours)

Total billable expenses incurred for the quarter amounted to \$0

b) Recovery Program Participant Comments

N/A

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

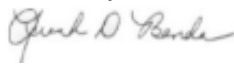
24. IM Response

N/A

a) Recovery Program Participant Comments

Name of Integrity Monitor: CohnReznick

Name of Report Preparer: CohnReznick

Signature 

Date: 4/10/2026