

**Integrity Monitor Report  
Category 3**

Integrity Monitor Firm Name: The North Highland Company LLC  
Quarter Ending: 09/30/2021  
Expected Engagement End Date: 11/30/2021

**A. General Info**

1. Recovery Program Participant:

State of New Jersey, The Department of Children & Families

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

[CARES]

3. State Funding Source (if applicable):

N/A

4. Deadline for Use of State or Federal Funding by Recovery Program Participant:

CARES Act ends 12/31/2021 unless otherwise extended

5. Accountability Officer:

Catherine Schaeffer

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

Supporting Vulnerable Youth, Congregate Care Support, DCF PPE and Sanitization, Extending Foster Care, MRSS Support, & Reimbursement for DWCF Provider Agencies – PPE, Cleaning, & Technology

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

1. Supporting Vulnerable Youth: Vulnerable youth received an allocated amount of funds to offset increased expenses and income loss for COVID-19 retroactive to Executive Order No. 103 and extending through December 30, 2020. Approximately 1,188 young adults age 18 through 23 were eligible for \$1,850 in one-time funding.

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2. Congregate Care Support: Contracted congregate care (youth housing) agencies received an allocated amount for COVID-19 related expenses retroactive to Executive Order No. 103. Attestations were required.
3. DCF PPE and Sanitization: Funds used to sanitize and disinfect the DCF's office locations and Office of Education ("OOE") school campuses, as well as vehicles utilized by NJDCF ("Sanitization and Disinfection"); and continues to expend funds to provide personal protective equipment ("PPE") for Department personnel; supporting the continuing needs of DCF personnel for PPE and for Sanitization and Disinfection of DCF offices and OOE school campuses.
4. Extending Foster Care: NJDCF is reimbursed to offset the increased and unanticipated costs associated with extending Child Protection and Permanency (CP&P) foster care services to prevent the "aging out" of youth in foster care at age 21 during the COVID-19 public health emergency and who lack permanent connection to family.
5. MRSS Support: Grant supported unaccounted for and eligible "necessary expenditures incurred due to the public health emergency" that were incurred between March 9, 2020 and ending before December 30, 2020. For MRSS provider agencies who incurred economic losses due to decreased customer volume as a result of the COVID-19 emergency.
6. Reimbursement for DWCF Provider Agencies – PPE, Cleaning, & Technology: Contract agencies apply for reimbursement of documented COVID-19 related expenses retroactive to Executive Order No. 166. Expenditures that qualify for reimbursement for COVID-19 related expenses: PPE, Cleaning, HIPAA compliant technologies.

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

1. Supporting Vulnerable Youth: \$2,200,00
2. Congregate Care Support: \$993,020
3. DCF PPE & Sanitization: \$5,500,000
4. Extending Foster Care: \$741,291
5. MRSS Support: \$13,985,744
6. Reimbursement for DWCF Provider Agencies: \$5,000,00

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

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1. Supporting Vulnerable Youth: \$2,035,000
2. Congregate Care Support: \$657,640
3. DCF PPE & Sanitization: On-going
4. Extending Foster Care: \$690,363
5. MRSS Support: \$8,176,594
6. Reimbursement for DWCF Provider Agencies: \$1,060,512

10. Amount Provided to Other State or Local Entities:

None that we are aware of.

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

DCF is winding down. There is one program, the DCF PPE & Sanitization Program that is still recording receivables per the documentation that we have in hand. The other five programs are in the process of a monitoring activity.

12. Completion Status of Integrity Monitor Engagement:

Engaged. Schedule end of the program is 11/30.

**B. Monitoring Activities**

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

a) IM Response

N/A – CARES funded

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.):

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a) IM Response

We are in the process of reviewing the data that has been provided and determining if there are gaps to be addressed. We will issue an RFI for those documents.

b) Recovery Program Participant Comments

[Type Here]

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

At this time, we are in the process of issuing an RFI to fill any gaps we may believe exist.

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

To date, we have connected with DCF and have obtained documents from DCF. We are examining these documents for compliance with the CRF standards set by the US Treasury, the terms of the MOU, 2 CFR, and best practices for documenting supplemental assistance.

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

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We have noted that the Department has issued payments. We are following up to ensure we have all the necessary documentation to support the Department.

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

We have engaged in a detailed review and analysis of each of the six program files, and provided documentation, to ensure no waster, fraud, or abuse has occurred. To date, we have no findings to report.

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

As of this report, there are no outstanding issues to report. We have engaged in communication with the Department to ensure that we fully understand the program through the lens of the documents provided and the necessary documents needed to support the Department.

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

Nothing to note

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b) Recovery Program Participant Comments

[Type Here]

21. Details of any actions taken to remediate waste, fraud, and/or abuse noted in past quarters:

a) IM Response

There have not been any issues of fraud, waste, or abuse to note as of this report. Therefore, no remediation activities have occurred.

b) Recovery Program Participant Comments

[Type Here]

**C. Miscellaneous**

22. List of hours (by employee) and expenses incurred to perform quarterly integrity monitoring review:

a) IM Response

[Jason Pettus: Hours to date: 91  
Logan Marrett: Hours to date: 80  
Steve Stevens: Hours to date: 1  
Nicole Acosta: Hours to date: 3  
Toree Ennis: Hours to date: 10

No further expenses to report.]

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

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The Department of Children and Families team has been a great partner. We look forward to our continued partnership and successful competition of this activity.

b) Recovery Program Participant Comments

[Type Here]

Name of Integrity Monitor:	The North Highland Company LLC
Name of Report Preparer:	Jason Pettus
Signature:	<i>Jason Pettus</i>
Date:	09/30/2021