

State of New Jersey
 Department of Treasury
 Integrity Oversight Monitoring Reporting Model

Firm Name: Navigant Consulting Inc.
 Engagement: EQ2014-002-P3-DCA Sandy Contracts
 For Quarter Ending: 9/30/2015

Reports required under A-60 will be submitted by Integrity Monitors on the first business day of each calendar quarter to the State Treasurer and will contain detailed information on the projects/contracts/programs funded by the Disaster Relief Appropriations Act.

No.	Recipient Data Elements	Response	Comments
General Info			
1.	Recipient of Funding	The New Jersey Department of Community Affairs ("DCA"), Sandy Recovery Division ("SRD"), is the direct recipient of funding from the United States Department of Housing and Urban Development ("HUD"), Community Development Block Grant, Disaster Recovery Program ("CDBG-DR") to address the massive property damage inflicted by Superstorm Sandy. DCA retained several contractors, who fall under the purview of the New Jersey Integrity Oversight Monitor Act ("A-60"), to assist it in managing various programs designed to distribute CDBG-DR funds to eligible New Jersey residents and businesses. These Contractors include the Gilbane Building Company ("Gilbane"), CB&I Shaw ("CB&I"), and the URS Group, which were retained to manage the Rehabilitation, Reconstruction, Elevation and Mitigation Program ("RREM"); Gilbane, which was retained to manage the Landlord Rental Repair Program ("LRRP"); CGI Federal ("CGI"), which was retained to create and manage the Sandy Integrated Recovery Operations and Management System ("SIROMS"), an information technology solution to assist DCA in managing its SRD programs; Hammerman & Gainer ("HGI"), which was retained to manage the housing application process for the SRD's various housing programs; ICF, Inc., which was retained to provide subject matter expertise and staffing augmentation services to DCA; and Cohn Reznick, which was retained to serve as DCA's internal integrity monitor.	
2.	Federal Funding Agency? (e.g. HUD, FEMA)	HUD	
3.	State Funding (if applicable)	None	
4.	Award Type	HUD CDBG-DR Award	
5.	Award Amount	Gilbane (RREM): \$54,606,950; Gilbane (LRRP): \$10,811,324 CB&I/Shaw: \$86,057,625 CGI: \$65,698,399 ICF: \$74,134,279 URS: \$20,096,853 HGI: \$67,739,989 Cohn Reznick: \$9,992,683	

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6.	Contract/Program Person/Title	<p>RREM and LRRP: Stephen Grady, Assistant Director, Housing Recovery Programs, DCA SIROMS and Sandy Grant Manager Module ("SGM"): Linda Torres, Contract Manager, DCA Information Technology Director ICF: Elizabeth Mackay, Assistant Division Director, DCA Sandy Recovery Division Cohn Reznick: Robert Bartolone, Director, Office of Auditing, DCA</p>	
7.	Brief Description, Purpose and Rationale of Project/Program	<p>RREM provides CDBG-DR awards of up to \$150,000 to eligible homeowners to restore homes damaged by Superstorm Sandy. LRRP provides CDBG-DR awards of up to \$50,000 per unit to owners of rental properties with between 1 and 25 units that require rehabilitation as a result of Superstorm Sandy. SIROMS, developed and administered by CGI, manages all of DCA's Superstorm Sandy funding requests from State agencies, local governments and school districts, as well as all HUD reporting obligations. SGM, a grant tracking system, was developed by CGI. It has replaced the eGrant system developed by HGI. ICF provides strategic advice, program implementation, subject matter expertise and staff augmentation services to DCA. Superstorm Sandy Housing Incentive Program ("SSHIP") covered the completion and processing of housing program applications, and the determination of eligibility and disbursement of funds under the Resettlement Incentive Program, and the RREM and LRRP Programs. HGI was the original contractor selected to manage SSHIP, but prior to the beginning of Navigant's monitorship, DCA and HGI, by mutual agreement, terminated HGI's role as the SSHIP contractor. HGI's performance under the contract is currently the subject of an arbitration proceeding. The New Jersey Attorney General's Office represents the State in that proceeding. DCA assumed responsibility over HGI's duties at the Superstorm Sandy Housing Recovery Centers, and CGI assumed responsibility for migrating applicant data from HGI's eGrants system to CGI's SGM system. CGI has completed the migration of data from eGrants to SGM, and is managing the data for the RREM and LRRP programs going forward.</p>	
8.	Contract/Program Location	Trenton, New Jersey	

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9.	Amount Expended to Date	Amounts are based on current invoice totals as of September 30, 2015: Gilbane (RREM): \$38,131,992; Gilbane (LRRP): \$6,873,926 CB&I/Shaw: \$32,677,232 CGI Federal: \$39,379,272 ICF: \$40,363,816 URS: \$5,543,381 HGI: \$35,910,449 Cohn Reznick: \$9,065,058	
10.	Amount Provided to other State or Local Entities	N/A	
11.	Completion Status of Contract or Program	Completion Status based on contract values and invoiced amounts as of September 30, 2015: RREM (Gilbane/CB&I Shaw/URS): approximately 52% LRRP (Gilbane): approximately 64% SIROMS/SGM (CGI): approximately 60% ICF: approximately 54% Cohn Reznick: 100%	
12.	Expected Contract End Date/Time Period	RREM (Gilbane & CB&I Shaw): May 22, 2017 LRRP (Gilbane): June 30, 2016 CGI: May 24, 2016 ICF: July 15, 2016 Cohn Reznick: June 30, 2015	
Monitoring Activities			
13.	If FEMA funded, brief description of the status of the project worksheet and its support.	N/A	

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14.	<p>Quarterly Activities/Project Description (include number of visits to meet with recipient and sub recipient, including who you met with, and any site visits warranted to where work was completed)</p>	<p>Navigant's integrity oversight monitoring activity for the Third Quarter 2015 focused principally on four areas: (1) reviewing the invoices of the two RREM Contractors, Gilbane and CB&I/Shaw ("the Contractors"), and their numerous subcontractors; (2) attending and observing homeowner and Contractor meetings and inspections, conducting site visits of homes in the RREM program, and providing feedback to DCA and the Contractors; (3) completing our comprehensive technical electronic analyses of RREM application data to identify potentially problematic files for further review; and (4) developing the methodology to commence a technical electronic analysis of LRRP application data to identify potentially problematic files for further review. During this quarter, we conducted 20 meetings with DCA, Treasury, NJ Attorney General's Office, CB&I/Shaw, Gilbane, Housing Center staff and RREM applicants. We also conducted site visits in Hoboken, Union Beach and Toms River, NJ encompassing 133 properties.</p>	
		<p>A. Invoice Review:</p> <p>Throughout the Quarter, we continued our review of the RREM and LRRP Contractor and their respective subcontractor invoices, and continued conducting the following three targeted reviews of certain billings:</p> <p>(1) Follow up with CBI/Shaw and DCA to obtain and review the supporting documentation for the time and material invoices submitted by one of its hazmat subcontractors, quantify the extent of unsupported billings, and review any reissued invoices.</p> <p>(2) Obtain from Gilbane and review additional supporting documentation for the time and material invoices submitted by one of its hazmat subcontractors, and update our invoice analytics and preliminary findings.</p> <p>(3) Update our invoice database to compile relevant invoice details for further analysis to include comparing and reconciling Contractor purchase order amounts and certain subcontractor invoices.</p>	
		<p>Navigant reported in the prior Quarter's report that a CBI/Shaw hazmat subcontractor submitted billings on a time and materials basis totaling \$2.12 million, which included Contractor markups by CBI/Shaw. These billings were for 727 hazmat inspections (447 asbestos and 280 lead inspections). We followed up with CBI/Shaw and presented our findings and observations to DCA regarding the accuracy, adequacy and appropriateness of the supporting documentation. Consequently, CBI/Shaw agreed that it will correct these billings and submit revised invoices for this hazmat subcontractor's entire time and materials billings that could not be properly supported.</p>	

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		<p>During the quarter, Navigant reviewed additional time and materials invoices submitted by the same CBI/Shaw hazmat subcontractor totaling \$591K, which included Contractor markups by CBI/Shaw. This additional billings were for 223 hazmat inspections (119 asbestos and 104 lead inspections). Accordingly, CBI/Shaw has invoiced DCA a total of \$2.71 million on a time and materials basis for a total of 950 hazmat inspections.</p> <p>DCA concurred with Navigant's findings regarding the hazmat subcontractor's unsupported time and materials billings. Pursuant to our findings, DCA worked collaboratively with Navigant to review CBI/Shaw's reissuance of the hazmat subcontractor's billings that were originally prepared on a time and materials basis and then converted to a unit price basis. The reissued billings utilized unit prices which were previously approved unit rates between CBI/Shaw and its hazmat subcontractor and approved/accepted by DCA. As a result, the total of the revised invoices based on unit prices was \$2.01 million. Accordingly, the reissuance of the time and materials billings to a unit price basis resulted in a savings to the State of New Jersey totaling \$694K. DCA informed Navigant that the State will offset the \$694K as a credit against CBI/Shaw invoices that have not been paid.</p> <p>Additionally during this Quarter, Navigant continued our ongoing review of additional Gilbane subcontractor invoices to identify any pricing that is inconsistent with the Gilbane's purchase orders and/or contracts with their subcontractors. We continued to track and summarize these preliminary potential discrepancies, and followed up with Gilbane to obtain any amendments or updates to the existing subcontractors' contractual documents to supplement or supersede, if applicable, information that Gilbane have provided to us to date. During the next Quarter when Navigant expects to receive all of the additional requested documentation, we will determine if the invoices are consistent with the contract terms, are accurate and fully supported, and quantify the extent of unsupported time and material invoices submitted by one of Gilbane's hazmat subcontractors.</p> <p>Navigant will continue to request and review new invoices submitted by the Contractors on a recurring basis, and will update our Contractor and Subcontractor invoice database to compile relevant invoice details for further ongoing analysis. This database will enable us to verify the mathematical accuracy of invoiced amounts, validate the invoiced unit rates, identify any second-tier subcontractors, track the amount of the subcontractors' billings to date, and track total amounts billed by subcontractors to the terms of their subcontractor agreements or purchase orders. It will also enable us to conduct additional invoice analytics based on the RREM and LRRP application numbers, other key information and underlying source documents.</p>	

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		<p>B. Meetings and Inspections:</p> <p>During the Quarter, we reviewed relevant documentation available on SIROMS, conducted site visits and attended two (2) meetings with RREM applicants and various RREM program representatives, which included Contractors, homeowners and homeowner selected builders/lifters. The meetings consisted of a 5A Meeting, and a 50% Inspection.</p> <p>The RREM-Contractor ran the 5A Meeting in an organized manner, consistent with meetings attended in prior quarters. The documentation provided and/or reviewed at the meeting included the most current documentation available on SIROMS. The Contractor provided clear instructions and explanations, and damaged property owners affirmatively indicated they understood the information and directions being provided.</p> <p>The 50% inspection, standard for Pathway C homes, was done in order to assess the value of the work that has been performed by the RREM assigned homebuilder. The RREM Contractor documented the current status by performing an inspection, including electronic photographs for record. The home had recently been lifted and new foundation/block walls were installed. Based on the Grant Award value, it was determined that the completed work exceeded the 50% threshold which would allow for the next draw of funding to be released to the homebuilder. As a follow-up, it was noted on SIROMS that a check dated 9/14/2015 was issued for this applicant.</p> <p>Either prior or after attending the meetings we reviewed each applicant’s current workflow status and supporting documentation available within SIROMS, including the Grant Award Calculation (“GAC”), Work-in-Place Estimates (“WIP”), Estimated Cost to Repair (“ECR”) and Reimbursement Requests, among other documents. It was determined that there were no inconsistencies between SIROMS and the documents presented and reviewed in the meetings. The meetings were held at a damaged home that was currently being reconstructed and the Housing Recovery Centers (“HRC”). No issues were observed or found at either of the meetings.</p> <p>In addition to attending the formal RREM Contractor meetings, a series of site visits were performed. Specifically, site visits were performed in three towns (Hoboken, Union Beach and Toms River) encompassing 133 properties in the RREM program. In preparation for the site visits, a list of the RREM homes within each town was extracted from SIROMS and verified with a CGI export of the data. The current “status” within SIROMS, as well as some key information, including Grant Award, Grant Award Signing Date, Reimbursement Award, Pathway, Payments Received etc., were extracted from SIROMS in preparation for the site visits.</p>	

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		<p>During the site visits, the status of construction, if any, and evidence of work either being performed, or completed was noted. As these site visits and inspections were random and not performed in conjunction with RREM Contractor or other scheduled meetings, interior inspections were not performed. Our observations included an evaluation of the following: (a) Were construction crews present; (b) Has the elevation of the damaged property been completed or in the process of being performed; (c) Is past or ongoing work evident; (d) Are construction permits posted; (e) Is the damaged property still an empty lot; and (f) Does the construction appear to be complete?</p> <p>A total of 133 site visits were performed in three towns, Hoboken (36 total), Union Beach (79 total), and Toms River (18 total).</p> <p>A database of the individual RREM Applicant's information is being maintained for the damaged properties that were visited. In the next quarter, a review of the SIROMS data in conjunction with the site visit information will be evaluated to determine any areas of interest or specific files that may require follow-up.</p>	
		<p>C. Technical Electronic Analyses:</p> <p>During the Quarter, Navigant continued our comprehensive technical analyses to identify potentially problematic RREM applications for further review.</p> <p>As a continuation of an analysis performed last Quarter, Navigant took further steps to identify additional potentially questionable changes to the mailing address and damaged property address fields recorded in SIROMS. This Quarter, Navigant received updated SIROMS audit log data from CGI, inclusive of all changes tracked in the original audit log extract and additional changes recorded since the original extract was received in November 2014. Using the updated extract, Navigant identified 3,438 funded or waitlisted applications in which a change was recorded in the SIROMS audit log for at least one of the address fields of interest. Because this step of the analysis was previously performed over the original audit log data, Navigant then isolated the additional changes made to the mailing address and damaged property address fields and ran the values recorded before and after each change through an algorithm that calculates the similarity between the contents of each field before and after each change.</p>	

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		Based on the results, Navigant completed a detailed initial review of the additional changes in order to assign a risk ranking to each additional address change. Following the same process from our review of the original audit log extract data, Navigant applied a two-phased approach to identify an aggregated prioritized subset of 1,191 applications for further review. Similar to results established in the previous Quarter, our initial review indicated that there can be a number of reasons for a valid address change. Relevant public record research was conducted for a sample of the high risk applications identified in this subset, and it was determined from this research that the addresses for these applicants in this group were valid, and therefore did not warrant any further review or investigation.	
15.	Brief Description to confirm appropriate data/information has been provided by recipient and what activities have been taken to review in relation to the project/contract/program.	Navigant obtained (1) from DCA, invoice-related documentation (2) from DCA, supplemental applicant related data (3) from the Contractors, regular schedules of their planned RREM applicant meetings and inspections, and some, but not all, of the invoice-related documentation requested; and (4) from CGI, data extracts containing the historical RREM application structured data available at the time of the data migration, the current RREM application structured data available when the extract was prepared, and the current audit trail of changes made to the RREM application data available when the extract was prepared. This data and information was utilized in the analyses described in paragraph 14 above.	
16.	Description of quarterly auditing activities that have been conducted to ensure procurement compliance with terms and conditions of the contracts and agreements.	As described in paragraph 14 above , during this Quarter, Navigant reviewed the invoices of the RREM Contractors and their subcontractors for billing irregularities; attended and observed homeowner and Contractor meetings and inspections to assess compliance with program policies, procedures and controls, and provided feedback to DCA and the Contractors; conducted site visits of homes under construction or repair; completed our two comprehensive technical electronic analyses of RREM application data to identify potentially problematic files for further review; and developed the methodology to commence a new technical analysis of LRRP application data to identify potentially problematic files for further review.	

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17.	<p>Have payment requisitions in connection with the contract/program been reviewed? Please describe</p>	<p>As described in paragraph 14 above, during this Quarter, Navigant continued reviewing the RREM Contractor invoices and their subcontractor invoices, and updated our invoice database to compile relevant invoice details for further analysis. This database enables us to verify the mathematical accuracy of invoiced amounts, validate the invoiced unit rates, identify any second-tier subcontractors, track the amount of the subcontractors' billings to date, track total amounts billed by subcontractors to the terms of their subcontractor agreements or purchase orders, and conduct additional invoice analytics based on the RREM and LRRP application numbers and other key information and underlying source documents. Our review during the Quarter continued to identify potential billing issues that require additional documentation to resolve. Navigant presented our preliminary findings related to the billing issues to DCA in the previous quarter. Pursuant to our findings, DCA worked with Navigant to continue their efforts to resolve the billing issues that subsequently resulted in a \$694K savings to the State for the previous unsupported time and materials invoices submitted by CBI/Shaw for payment. To complete and close out this CBI/Shaw subcontractor's time and materials invoice analysis, we examined the revised invoices and additional back-up documentation obtained by DCA from the Contractors and performed a reconciliation with our findings.</p>	
18.	<p>Description of quarterly activity to prevent and detect waste, fraud and abuse.</p>	<p>As described in paragraph 14 above, all of Navigant's work this Quarter was designed to prevent and detect waste, fraud and abuse. Our review of the invoices of the RREM Contractors and their subcontractors sought to identify any potential irregularities with billings submitted by the Contractors and their subcontractors; our attendance at homeowner and RREM Contractor meetings and field inspections sought to identify any irregularities in the conduct of RREM meetings and inspections that might be in conflict with RREM program policies and procedures, or that might undermine the controls established for the program; our performance of site visits to analyze and reconcile the progress of repairs with payments made to both homeowners or homebuilders; and our technical electronic analyses of the universe of RREM and LRRP applications sought to identify potentially problematic applications for further review using data extracts from SIROMS.</p>	
19.	<p>Provide details of any integrity issues/findings</p>	<p>As explained in paragraphs 14 and 18 above, our review of the invoices of the RREM Contractors and their subcontractors identified potential billing issues. The billing issues are in the process of being resolved pursuant to the issuance of revised invoices and a credit memo to the State, and we continue to review and reconcile against our analysis in the next Quarter after receipt of additional documentation from DCA; and the second of two technical electronic analyses of the universe of RREM applications using data extracts from SIROMS which addressed potential applicant eligibility issues was completed and no further action will be necessary. We have also developed a methodology to commence a new technical analysis of LRRP applications, similar to our RREM technical analyses, using data extracts from SIROMS to identify and analyze potential applicant eligibility issues. This analysis will commence in the next Quarter.</p>	

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20.	Provide details of any work quality or safety/environmental/historical preservation issue(s).	N/A	
21.	Provide details on any other items of note that have occurred in the past quarter	N/A	

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22.	Provide details of any actions taken to remediate waste, fraud and abuse noted in past quarters	N/A	
C. Miscellaneous			
23.	Attach a list of hours and expenses incurred to perform your quarterly integrity monitoring review	For the Quarter Ending September 30, 2015: Total hours incurred: 617.60 hours Total fees incurred: \$166,195 Total expenses incurred: \$0	
24	Add any item, issue or comment not covered in previous sections but deemed pertinent to monitoring program.	N/A	

Name of Integrity Monitor: Navigant Consulting Inc. Name of Report Preparer: Daniel F. Gill

Signature:
Date: December 31, 2015

**Appendix A
Meetings Conducted
For Quarter Ending 9/30/2015**

I. Department of Community Affairs

- | | |
|-------------------------|--|
| A. David Reiner | Deputy Commissioner, Sandy Recovery Division |
| B. Laura Shea | Assistant Commissioner, Sandy Recovery Division |
| C. Sam Viavattine | Director, Sandy Recovery Division |
| D. Robert Bartolone | Director, Office of Auditing |
| E. Elizabeth Mackay | Assistant Division Director-Legal |
| F. Jerry O'Brien | Principal Fiscal Analyst |
| G. Vera Ellen Ricciardi | CFO, Sandy Recovery Division |
| H. Michael Simon | Compliance |
| I. Terri Quintero | Sr. Contracting Officer-Procurement/Legal- Sandy Recovery Division |

II. Department of the Treasury

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|--------------------|---|
| A. David Ridolfino | Associate Deputy State Treasurer |
| B. Roseann Kovall | Integrity Oversight Monitor Program |
| C. Jeff Burns | Division of Administration-Emergency Operations Coordinator |
| D. Matthew Murray | Office of the Treasurer-Deputy Chief of Staff |

III. Gilbane Building Company

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|--------------------|-----------------|
| A. Bart Gentile | Project Manager |
| B. Virginia Franco | Project Manager |

V. Shaw Environmental, Inc. (a CB&I Company)

- | | |
|--------------------|--------------------------------------|
| A. Jo Carroll | Program Manager |
| B. Tarek Bahgat | Project Controls Manager |
| C. Daniel Paetzold | Deputy Program Manager- RREM Program |