



PHILIP D. MURPHY  
Governor

## State of New Jersey

SHEILA Y. OLIVER  
Lieutenant Governor

DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT  
P.O. BOX 950, TRENTON, NEW JERSEY 08625-0950

ROBERT ASARO-ANGELO  
Commissioner

April 18, 2022

### AMENDMENT TO PURCHASE ORDER #21-PROSV-01441:4 / Vander Weele Group LLC CONTRACT: G4018

A letter of engagement was issued to Vander Weele Group LLC on December 22, 2021 to perform integrity monitoring services as described in that engagement. On March 30, 2022, New Jersey Department of Labor and Workforce Development and Vander Weele Group LLC agreed to the following no-cost modification.

- Reduction to Item #5, Class-item 918-00, Category 3 Integrity Monitoring/Anti-Fraud, Year 1 – Hourly Consultant Rate by 31.67 hours or \$4,275.45. Revised quantity 210.33 hours and total cost \$28,394.55.
- Increase to Item #1, Class-item 918-00, Category 3 Integrity Monitoring/Anti-Fraud, Year 1 – Hourly Partner/Principal/Director Rate by 18.0019 hours or \$4,275.45. Revised quantity 36.0019 and total cost \$8,550.45.

This no-cost modification is needed to adjust the number of hours allocated to the tasks set forth in the engagement and to ensure the appropriate review and analysis of the requested work is completed. The VWG Partner has an extensive background as an Inspector General and a focus on anti-fraud. Her expertise will bring extensive application of knowledge and competency to the requested level of work.

The parties agree that all deliverables in the engagement remain unchanged and must be completed by May 31, 2022. The parties also agree that all other terms and conditions under this Engagement remain in full force and effect.

*Theresa Vallely*

Theresa Vallely  
New Jersey Department of Labor and Workforce Development

Maribeth Vander Weele  
Vander Weele Group LLC



INTERNAL  
AUDIT

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AD-18.38 (2/20)



PHILIP D. MURPHY  
Governor

## State of New Jersey

DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT  
P.O. BOX 950, TRENTON, NEW JERSEY 08625-0950

ROBERT ASARO-ANGELO  
Commissioner

March 22, 2022

### AMENDMENT TO PURCHASE ORDER #21-PROSV-01441:1 / Vander Wee Group LLC

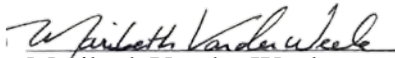
A letter of engagement was issued to Vander Wee Group LLC on December 22, 2021 to perform integrity monitoring services as described in that engagement. On March 17, 2022, New Jersey Department of Labor and Workforce Development and Vander Wee Group LLC agreed to extend the term of the engagement to May 31, 2022.

Reporting Requirements: Vander Wee Group LLC shall fulfill the monthly and quarterly reporting requirements as set forth in the Engagement Query. First confidential draft of Unemployment Fraud Prevention and Detection Policy must be delivered by March 31, 2022, and a final draft by May 31, 2022. All deliverables must be completed by May 31, 2022.

The parties agree that all other terms and conditions under this Engagement remain in full force and effect.

*Theresa Vallely*

Theresa Vallely  
New Jersey Department of Labor and Workforce Development

  
Maribeth Vander Wee  
Vander Wee Group LLC



INTERNAL  
AUDIT

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AD-18.38 (2/20)

Letter of Engagement

December 22, 2021

Successful Bidder:

On behalf of the Department of Labor, the State of New Jersey, Department of the Treasury hereby issues this Letter of Engagement to Vander Weele Group, pursuant to the Engagement Query issued on December 10, 2021 and Vander Weele Group's proposal dated December 20, 2021.

All terms and conditions of the Engagement Query, including but not limited to the Scope of Work, milestones, timelines, standards, deliverables and liquidated damages are incorporated into this Letter of Engagement and made a part hereof by reference.

The total cost of this Engagement shall not exceed \$172,310.98

The Integrity Monitor is instructed not to proceed until a purchase order is issued.

Thank you for your participation in the Integrity Monitor program.

Sincerely,

Mona Cartwright  
IM State Contract Manager

## **INTEGRITY MONITOR ENGAGEMENT QUERY**

Contract G4018 – Integrity Oversight Monitoring: Program and Performance Monitoring, Financial Monitoring and Grant Management and Anti-Fraud Monitoring for COVID-19 Recovery Funds and Programs

Department of Labor and Workforce Development  
Category 3 services per Section 3.1.1 of the IOM RFQ

### **I. GENERAL INFORMATION:**

On March 9, 2020, Governor Murphy issued Executive Order 103 declaring both a Public Health Emergency and State of Emergency in light of the dangers of the Coronavirus disease 2019 (“COVID-19”). On March 13, 2020, the President of the United States declared a national emergency and determined that the COVID-19 pandemic was of sufficient severity and magnitude to warrant a nation-wide emergency declaration under Section 501 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121-5207, (“Stafford Act”) and that declaration was extended to the State of New Jersey on March 25, 2020 pursuant to Section 401 of the Stafford Act. Since then, Congress has enacted legislation to stimulate economic recovery and assist State, Local and Tribal governments navigate the impact of the COVID-19 outbreak and cover necessary expenditures related to the public health emergency.

On July 17, 2020, Governor Murphy signed Executive Order 166 (“E.O. 166”), which established the COVID-19 Compliance and Oversight Task Force (the “Taskforce”) and the Governor’s Disaster Recovery Office (GDRO).

Pursuant to E.O. 166, the Taskforce has issued guidelines, which have been updated as of June 2021 and are attached hereto, regarding the appointment and responsibilities of COVID-19 Oversight Integrity Monitors (“Integrity Monitors”). Integrity Monitors are intended to serve as an important part of the State’s accountability infrastructure while working with Using Agencies in developing measures to prevent, detect, and remediate inefficiency and malfeasance in the expenditure of COVID-19 Recovery Funds and provide expertise in Program and Process Management Monitoring; Financial Auditing and Grant Management; and Integrity Monitoring/Anti-fraud services.

The New Jersey Department of the Treasury (Treasury) has established a pool of qualified Integrity Monitors for oversight of COVID-19 Recovery Funds and Programs pursuant to the Request for Quotation for Integrity Oversight Monitoring: Program and Performance Monitoring, Financial Monitoring and Grant Management and Anti-Fraud Monitoring for COVID-19 Recovery Funds and Programs (IOM RFQ) that Using Agencies may now use to discharge their responsibilities under E.O. 166. The Integrity Monitor’s executed State of NJ Standard Terms and Conditions (SSTC) will apply to all Integrity Monitoring Engagements executed via this Engagement Query.

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This Engagement Query is issued by the Department of the Treasury on behalf of the **Department of Labor and Workforce Development.**

The purpose of this Engagement Query is to solicit services for Integrity Monitoring Category 3 per section 3.1.1 of the IOM RFQ.

The capitalized terms in this Engagement Query shall have the same meanings as set forth in the IOM RFQ.

## **A. Background**

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which became federal law on March 27, 2020, created three new unemployment insurance (UI) benefit programs that were implemented and managed by the Unemployment Division of the New Jersey Department of Labor and Workforce Development (Using Agency):

**Pandemic Unemployment Assistance (PUA)**—Provides unemployment compensation to workers who have typically been found ineligible for UI benefits (e.g., self-employed workers, independent contractors). New Jersey Department of Labor and Workforce Development expended \$5.6 billion in PUA benefits.

**Federal Pandemic Unemployment Compensation (FPUC)**—An additional \$600/\$300 per week, on top of regular state UI benefits and PUA benefits. All UI recipients and PUA recipients received this extra benefit between April 4, 2020 and September 4, 2021. New Jersey Department of Labor and Workforce Development expended \$9 billion in FPUC benefits.

**Pandemic Emergency Unemployment Compensation (PEUC)**—An additional 13 weeks of UI benefits, beyond the regular 26 weeks that most states provide, for a total of 39 weeks of coverage. New Jersey Department of Labor and Workforce Development expended \$3.8 billion in PEUC benefits.

New Jersey Department of Labor and Workforce Development received \$133.5 million to administer these programs, of which \$84 million had been expended. The program period ended, however, the department continuous to administer benefits for the effective period ending September 4, 2021.

## **II. SCOPE OF WORK (SOW) REQUIREMENTS**

### **A. Project Description**

- a. The Integrity Monitor shall be able to perform the monitoring virtually;
- b. The Integrity Monitor shall perform Risk Assessments of the PUA, FPUC, and PEUC programs at minimum addressing the items in the Risk Assessment attached hereto at Attachment 3 ;

- c. The Integrity Monitor shall perform a programmatic review and document the processes and procedures that were established since inception of the programs and designed to prevent and detect any Fraud, Waste and Abuse in the Unemployment Insurance, PUA, FPUC, and PEUC programs;
- d. The Integrity Monitor shall evaluate effectiveness of these processes and procedures via interview of personnel and procedure walk-throughs. Minimal testing may be necessary to understand the procedures in place. The integrity monitor shall identify deficiencies and suggest corrective action.
- e. Integrity Monitor shall draft a confidential Unemployment Fraud Prevention and Detection Policy based on documented and evaluated processes and procedures, including any suggested corrective action;
- f. Integrity Monitor shall submit a monthly report to the Agency Contract Manager on the 1<sup>st</sup> of each month for the preceding month that will outline monitoring activities and any deficiencies identified in the Department's program policies and procedures.
- g. The Integrity Monitor shall have bi-weekly meetings via Microsoft Teams or other virtual meeting platform with the Accountability Officer to report on progress toward meeting the deliverables and to discuss any issues that may need to be resolved.

## **B. Specific Performance Milestones/Timelines/Standards/Deliverables**

- a) All deliverables must be completed by March 31, 2022;
- b) Risk Assessments must be delivered by January 31, 2022;
- c) First confidential draft of Unemployment Fraud Prevention and Detection Policy must be delivered by March 15, 2022, and a final draft by March 31, 2022.
- d) Integrity Monitor shall submit a monthly report to the Agency Contract Manager on the 1<sup>st</sup> of each month for the preceding month that will outline identified deficiencies.

## **C. Risk Assessment Summary**

Risk Assessments for the specified programs to be completed by the Integrity Monitor as specified in A above.

## **D. Reporting Requirements**

## 1. Quarterly Integrity Monitor Reports

- a. Pursuant to E.O. 166, the Integrity Monitor shall submit a draft quarterly report to the Using Agency on the last day of every calendar quarter detailing the specific services rendered during the quarter and any findings of waste, fraud, or abuse using the Quarterly Report template attached hereto. If the Integrity Monitor report contains findings of waste, fraud or abuse, the Using Agency has an opportunity to respond within 15 days after receipt.
- b. Fifteen business days after each quarter-end, the Integrity Monitor shall deliver its final quarterly report, including any comments from the Using Agency, to the State Treasurer, who shall share the reports with the GDRO, the Senate President, the Speaker of the General Assembly, the Attorney General, and the State Comptroller. The Integrity Monitor quarterly reports will be posted on the COVID-19 transparency website pursuant to E.O. 166.

## 2. Additional Reports

- a. E.O. 166 directs the Office of the State Comptroller, (OSC) to oversee the work of Integrity Monitors. Therefore, in accordance with E.O. 166 and the IOM Guidelines, OSC may request that the Integrity Monitor issue additional reports or prepare memoranda that will assist OSC in evaluating whether there is waste, fraud, or abuse in COVID-19 Recovery Programs administered by the Using Agencies. OSC may also request that the Integrity Monitor share any corrective action plan(s) prepared by the Using Agencies to evaluate whether those corrective plan(s) have been successfully implemented.

## 3. Reports of Waste, Fraud, Abuse, or Potential Criminal Conduct

- a. The Integrity Monitor shall report issues of waste, fraud, abuse and misuse of COVID-19 Recovery Funds immediately to the GDRO, OSC, the State Treasurer, the State Contract Manager, and the Accountability Officer. The Integrity Monitor shall report issues of potential criminal conduct immediately to the Office of the Attorney General.

### **III. Proposal Content:**

At minimum, the Integrity Monitor's proposal shall include the following:

- 1) A detailed proposal, describing how the Integrity Monitor intends to accomplish each component of the scope of work.
- 2) A detailed budget identifying staff classifications and hourly rates which shall not exceed the rates in the Integrity Monitor's BAFO Price Schedule.
- 3) A timeline for submission of the deliverables required by this Engagement Query.

- 4) Identification of any potential conflicts of interest regarding the delivery of services for the scope of work under this Engagement Query.
- 5) Identification of monitoring and audit experience relevant to the unemployment insurance programs and Cares Act fraud monitoring.

**IV. Submission of Proposals:**

Detailed proposals in response to this Engagement Query shall be submitted electronically by 3:00 p.m. on December 20, 2021. Proposals must be submitted via email as set forth below:

TO: State Contract Manager  
 Mona Cartwright, Fiscal Manager, Department of the Treasury  
 [REDACTED]

With a copy to the Agency Contract Manager Theresa Vallely at [REDACTED]

**V. Duration of the Engagement:**

The Engagement will commence upon the issuance of a Letter of Engagement and expire on March 31, 2021. At the option of the Using Agency, this Letter of Engagement may be extended. Any extension to this Letter of Engagement, however, may not to exceed the Contract Term, and any extensions thereto, as set forth in Section 5.2 of the IOM RFQ.

**VI. CONTRACT TERMINATION**

The IOM's failure to comply with the requirements of the Engagement, including but not limited to E.O. 166, the IOM RFQ, the IOM Guidelines and this Engagement Query may constitute a breach of contract and may result in termination of the contract by the Using Agency or imposition of such other remedy as the Using Agency deems appropriate in accordance with Section 9.0 of the RFQ.

**VII. LIQUIDATED DAMAGES**

At the Using Agency's option, liquidated damages may be assessed each time any of the below events occur, due to an act or omission of the IOM. The Using Agency and the IOM agree that it would be extremely difficult to determine actual damages that the Using Agency will sustain as the result of the IOM's failure to meet its contractual requirements. Any breach by the IOM could prevent the Using Agency from complying with E.O. 166, the IOM Guidelines, and laws applicable to the use and expenditure of COVID-19 Recovery Funds and other public funds; will adversely impact the Using Agency's ability to ensure identification and mitigation of risks; and may lead to damages suffered by the Using Agency and the State as a whole. If the IOM fails to meet its contractual obligations, the Using Agency may assess liquidated damages against IOM as follows:

Failure to deliver a Risk Assessments within fifteen (15) days of the due date in Section II, B	\$500/day
Failure to deliver a quarterly report by established due dates (listed in D Reporting Requirements)	\$500/day

**VIII. Questions regarding this Engagement Query :**

Any questions related to the Scope of Work must be submitted electronically by 3:00 p.m. on December 14, 2021. They must be submitted via email to [REDACTED] with a copy to the State Contract Manager; Mona Cartwright, [REDACTED]

**IX. Selection Process**

The Agency Contract Manager will review the proposal(s) received and select the Integrity Monitor whose proposal is most advantageous, price and other factors considered. The State Contract Manager will then issue a Letter of Engagement with a “not to exceed” clause to the selected proposer

Prior to issuing a Letter of Engagement, the Agency Contract Manager in consultation with the Accountability Officer, will independently determine whether the proposed Integrity Monitor has any potential conflicts with the Engagement.

**ATTACHMENTS**

Attachment 1: Integrity Oversight Monitor Guidelines, updated as of June, 2021

Attachment 2: Quarterly Report Template

Attachment 3: Risk Assessment Template

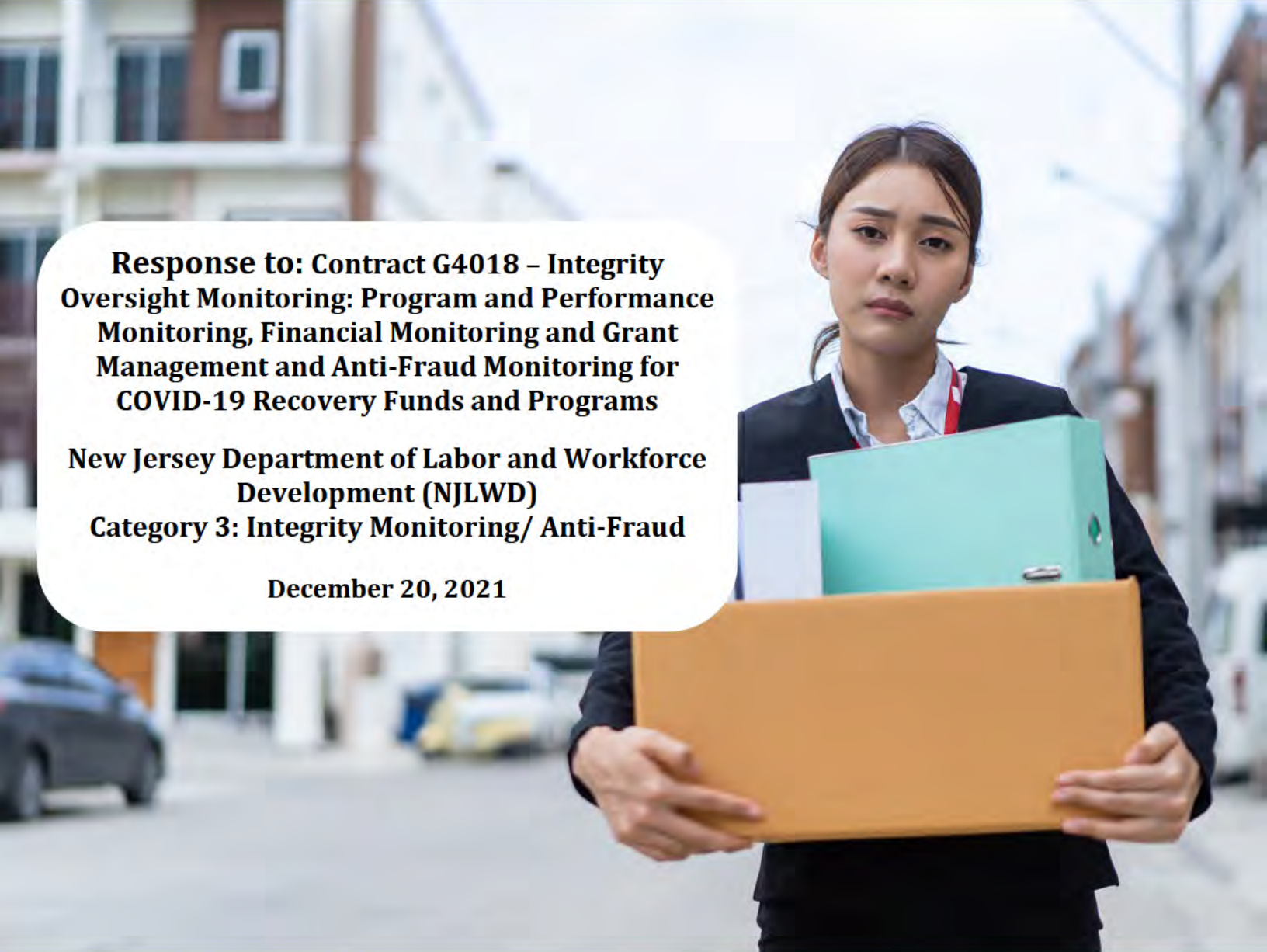
Notice of Executive Order 166 Requirement for Posting of Winning Proposal  
and Contract Documents

Pursuant to Executive Order No. 166, signed by Governor Murphy on July 17, 2020, the Office of the State Comptroller (“OSC”) is required to make all approved State contracts for the allocation and expenditure of COVID-19 Recovery Funds available to the public by posting such contracts on an appropriate State website. Such contracts will be posted on the New Jersey transparency website developed by the Governor’s Disaster Recovery Office (GDRO Transparency Website). The Letter of Engagement resulting from this Engagement Query is subject to the requirements of Executive Order No. 166. Accordingly, the OSC will post a copy of the Letter of Engagement, including the Engagement Query, the winning proposer’s proposal and other related contract documents for the above contract on the GDRO Transparency website.

In submitting its proposal, a proposer may designate specific information as not subject to disclosure. However, such proposer must have a good faith legal or factual basis to assert that such designated portions of its proposal: (i) are proprietary and confidential financial or commercial information or trade secrets; or (ii) must not be disclosed to protect the personal privacy of an identified individual. The location in the proposal of any such designation should be clearly stated in a cover letter, and a redacted copy of the proposal should be provided. A Proposer’s failure to designate such information as confidential in submitting a proposal shall result in waiver of such claim.

The State reserves the right to make the determination regarding what is proprietary or confidential and will advise the winning proposer accordingly. The State will not honor any attempt by a winning proposer to designate its entire proposal as proprietary or confidential and will not honor a claim of copyright protection for an entire proposal. In the event of any challenge to the winning proposer’s assertion of confidentiality with which the State does not concur, proposer shall be solely responsible for defending its designation.

# Vander Weele Group<sup>LLC</sup>



**Response to: Contract G4018 – Integrity Oversight Monitoring: Program and Performance Monitoring, Financial Monitoring and Grant Management and Anti-Fraud Monitoring for COVID-19 Recovery Funds and Programs**

**New Jersey Department of Labor and Workforce Development (NJLWD)**

**Category 3: Integrity Monitoring/ Anti-Fraud**

**December 20, 2021**

Presented by:

Vander Weele Group<sup>LLC</sup> and

Joseph A. DeLuca Advisory & Consulting Services

December 20, 2021

Mona Cartwright, State Contract Manager and Fiscal Manager  
New Jersey Department of the Treasury  
[REDACTED]

Theresa Vallely, Agency Contract Manager  
New Jersey Department of Labor and Workforce Development  
[REDACTED]

Dear Ms. Cartwright and Ms. Vallely,

The Vander Weele Group<sup>LLC</sup>, a certified Woman-Owned Business Enterprise and a Disadvantaged Business Enterprise, and Joseph A. DeLuca Advisory and Consulting Services LLC (“DLA”) are pleased to present this proposal to support the New Jersey Department of Labor and Workforce Development with oversight of unemployment programs funded through the CARES Act. The required services will address the Pandemic Unemployment Assistance, the Federal Pandemic Unemployment Compensation, and the Pandemic Emergency Unemployment Compensation programs.

If privileged to serve the Department, the Vander Weele Group<sup>LLC</sup> will serve as Prime Contractor, but DLA will take the lead in managing and providing many of the deliverables.

Founded in 2003 by a two-time Inspector General, the Vander Weele Group and its team offer a powerful combination of nationwide expertise to strengthen oversight of Federal and local grant programs. Our methodologies—derived from extensive experience in managing and providing oversight to large-scale programs—support financial compliance, promote programmatic fidelity, and curtail integrity breaches.

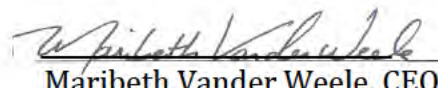
The Vander Weele Group<sup>LLC</sup> - DLA team has experience and expertise in providing the services called for in the Engagement Query. Key members of the DLA team, including Joseph DeLuca, Steven Pasichow, and Kevin Mullins, have extensive experience working with New Jersey government agencies. We have a long commitment to providing services to the government and understand what it takes to design and implement programs aimed at preventing and detecting fraud, waste, and abuse. DLA is particularly experienced in disaster recovery programs and related funding streams from a loss prevention perspective and is currently servicing both Middlesex and Gloucester Counties with COVID-19- related oversight services.

The Vander Weele Group<sup>LLC</sup> - DLA team has no conflicts of interest. We trust this proposal meets your expectations. Thank you for your time and consideration.

Sincerely,



Joseph A. DeLuca, CEO



Maribeth Vander Weele, CEO

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## I. INTRODUCTION

### A. Overview

The Vander Weele Group<sup>LLC</sup> and its New Jersey-New York subcontracting partner, Joseph A. DeLuca Advisory & Consulting Services LLC (“DLA”), are privileged to present this proposal to provide the New Jersey Department of Labor and Workforce Development (“NJLWD”) with oversight, compliance, and advisory services regarding unemployment insurance benefit programs established through the Coronavirus Aid, Relief, and Economic Security Act (“CARES Act”).

The Vander Weele Group<sup>LLC</sup> is a Federally certified Woman-Owned Business Enterprise (“WBE”) and a Disadvantaged Business Enterprise (“DBE”) specializing in grants oversight. We are a mission-minded organization, passionate about providing meaningful oversight and support to programs serving the public interest. Incorporated in 2003, the Vander Weele Group<sup>LLC</sup> was founded by Maribeth Vander Weele, a former member of the Chicago Public Schools turnaround team, a two-time Inspector General, and a noted author. She has overseen grants monitoring programs in 24 states, including a program that annually monitors services provided to 19,000 children with disabilities or developmental delays and a program monitoring approximately \$1 billion of COVID relief funds in the State of Illinois.

Our firm’s grants experience began in 2006, when we designed and executed grant-funded Safe Schools programs for the Bureau of Indian Education (“BIE”) of the U.S. Department of the Interior. In 2011, we designed a grants monitoring program for the BIE. Called a model for the nation by the U.S. Department of Education, it focused on programmatic effectiveness and later fiscal compliance in 183 Native American schools receiving Federal funds. In 2018, our firm narrowed its strategic vision to focus exclusively on grants oversight. Since then, we have recruited former government program officers with decades of grants experience, built an extensive library of information related to grants management, and developed extensive internal training.

As we continue to deepen our expertise in Federal grants oversight, we look forward to supporting our growing client base in their work to transform lives and uplift communities.

We have documented methodologies for every aspect of grants management.

DLA is a New York/New Jersey firm with extensive experience in integrity monitoring and conducting audits and controls reviews related specifically to the use of funds designated for COVID-19 relief through the CARES Act. As such, DLA will be taking on the majority of the tasks performed under this engagement should it be awarded to us. Founded by Joseph A. DeLuca in 2018, DLA brings the experience of highly decorated former Inspectors General, investigators, forensic accountants, and research analysts, to clients. Key members

of the DLA team come with experience working with New Jersey government agencies and New Jersey law enforcement. For example, Steven Pasichow, the proposed Program Manager for this assignment, is an Executive Managing Director with DLA who brings invaluable experience as previous Deputy Inspector General and Director of Investigations for the Port Authority of New York and New Jersey, and who currently manages the oversight for Middlesex County's Emergency Rental Assistance Program ("MCERAP").

The proposed Project Manager for this assignment is Kevin Mullins, who has significant experience in conducting audits and reviews of grants programs. In fact, some of that experience was providing oversight for another New Jersey agency's use of CARES funds, work he conducted at the end of 2020 and early 2021.

Since March 2020 at the onset of the Pandemic, the Vander Weele Group<sup>LLC</sup> - DLA teams have performed auditing, direct oversight, monitoring, consultation, and operational involvement supporting COVID-19 response efforts in multiple State and Local governments.

To ensure swift action during the influx of unprecedented health challenges, our team has taken a proactive approach toward ensuring our clients' adaptability to the COVID-19 disaster response and recovery.

Using our unique investigation qualifications and experience, the Vander Weele Group<sup>LLC</sup> - DLA team has access to stringent analysis, best practices, and insight. We have extensive disaster recovery expertise and have specialized in directing states and localities with disaster response and recovery prior to recent health developments.

Our experienced professionals bring wisdom and knowledge through previous procurements with Federal funding, emergency response to disasters such as Hurricane Sandy, and grant funding sources in New York, Philadelphia, Chicago, and New Jersey, to name a few. Seasoned in Federal recovery programs' governing regulations and policies, our team provides oversight and consultation for best practices in all phases of disaster recovery program lifecycles.

We provide insight into best practices for compliance with existing regulations and policies and ensure updates to Federal, State, and County guidelines are fulfilled. Programs must comply with applicable Federal regulations, including the Stafford Act, the Code of Federal Regulations (CFR), the FEMA Public Assistance Policy and Procedures Guide, the CARES Act, U.S. Treasury guidance, the American Rescue Plan Act, and more.

## B. Program Background and Objectives

When the CARES Act became law on March 27, 2020, three new supplemental unemployment insurance ("UI") benefit programs were created. These programs provide additional assistance to unemployed citizens while also broadening the eligibility

requirements. In New Jersey they are implemented and managed by the Unemployment Division of the NJLWD, and are collectively called the UI Benefit Programs. They include:

- Pandemic Unemployment Assistance (“PUA”),
- Federal Pandemic Unemployment Compensation (“FPUC”), and
- Pandemic Emergency Unemployment Compensation (“PEUC”).

The PUA provides unemployment compensation to workers who have typically been found ineligible for UI benefits. These workers include those who were:

1. Not eligible for unemployment benefits in any state, including self-employed workers (independent workers, “gig” workers),
2. Otherwise able and available to work except that they are unemployed, partially unemployed, or unable or unavailable to work due to a COVID-19 qualifying reason, and
3. Able to demonstrate labor market attachment, through earnings or an official work offer.

The PUA program allowed recipients to receive 60% of their average weekly salary, up to a maximum of \$731 per week (with the ability to supplement their benefit with other existing UI programs, as explained below). NJLWD expended \$5.6 billion in PUA benefits as of the date of the Integrity Monitor Engagement Query (“IMEQ”).

The FPUC program provided an additional \$600/\$300 per week in addition to regular state UI benefits and PUA benefits for all UI recipients from April 4, 2020, and September 4, 2021. NJLWD expended \$9 billion in FPUC benefits as of the date of this IMEQ.

The PEUC program provided an additional 13 weeks of UI benefits, beyond the regular 26 weeks provided by most states, provided that the recipients, according to the U.S. Department of Labor, “are able to work, available to work, and actively seeking work.” NJLWD expended \$3.8 billion in PEUC benefits.

NJLWD received \$133.5 million to administer these programs, \$84 million of which was expended as of the date of the IMEQ. NJLWD stated that administering benefits has been an ongoing operation, effectively ending on September 4, 2021.

For the above benefit programs, the Vander Weele Group<sup>LLC</sup> - DLA team will:

- Perform Risk Assessments of the PUA, FPUC, and PEUC programs by addressing, at minimum, the items in the attached Risk Assessment template;

- Perform a programmatic review of the PUA, FPUC, and PEUC programs and document the processes and procedures that were established, since the inception of the programs, to prevent and detect fraud, waste, and abuse;
- Evaluate the effectiveness of these processes and procedures via interviews of personnel and procedure walk-throughs. We understand that this may require minimal testing, as deemed necessary to the understanding of the procedures in place;
- Identify any deficiencies and suggest corrective actions in real time.
- Draft a confidential Unemployment Fraud Prevention and Detection Policy based on documented and evaluated processes and procedures, including any suggested corrective actions;
- Submit monthly reports to the Agency Contract Manager on the first of each month for the preceding month that will outline monitoring activities and any deficiencies identified in the Department's program policies and procedures.
- Conduct bi-weekly meetings, via Microsoft Teams or another virtual meeting platform, with the Accountability Officer to report on the progress made toward meeting the deliverables and to discuss any issues that may need to be resolved.
- Perform all of the above services virtually, unless suggested or explicitly approved by the Agency Contract Manager.

In addition to the above objectives stated in the IMEQ, the Vander Weele Group<sup>LLC</sup> - DLA team will ensure that NJLWD objectives adhere to 2 CFR 200.303 Internal Controls, such as:

- a) Establishing and maintaining effective internal controls over Federal awards to provide reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.
  - Internal controls should be in compliance with guidance from:
    - Standards for Internal Control in the Federal Government issued by the Comptroller General of the United States and/or,
    - Internal Control Integrated Framework issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- b) Comply with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal awards;
- c) Evaluate and monitor the non-Federal entity's compliance with statutes, regulations and the terms and conditions of Federal awards;
- d) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings; and,

- e) Take reasonable measures to safeguard protected Personally Identifiable Information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive, consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.

## II. CONFLICTS OF INTEREST

As stated, the Vander Weele Group<sup>LLC</sup> - DLA team has no conflicts of interest regarding this Engagement Query. We offer an objective, unbiased, and professional perspective.

## III. DELIVERABLES AND ACTIVITIES

### A. Proposed Approach

The Vander Weele Group<sup>LLC</sup> - DLA team will plan the scope of work by performing an internal control review of the UI Benefit Programs. An internal control review is the process of evaluating programs that have been designed and implemented to ensure the programs achieve their objectives in a compliant and effective manner.

The goal of our internal control review is to provide reasonable assurance that the UI Benefit Programs are compliant with Federal and state stipulations, including but not limited to, the CARES Act, the Uniform Guidance, and Executive Order 166, that they operate with maximum efficiency, and that they follow consistent financial reporting procedures. Internal control reviews help to assure transparency, accountability, and serve as preventative and detective measures against fraud, waste, and abuse.

In 1992, and updated in 2013, the Committee of Sponsoring Organizations of the Treadway Commission (“COSO”) published the first framework for effective internal controls after a slew of corporate fraud scandals in the 1980’s. The framework is broken into five components:

- Control Environment
- Risk Assessment
- Control Activities
- Information and Communication
- Monitoring

The Vander Weele Group<sup>LLC</sup> - DLA team will consider each of the five framework components, determining how well each does or does not support efficient operations, reliable financial reporting, and regulatory compliance, including measures to prevent and detect fraud, waste, and abuse.

Upon notification of an award and execution of a written agreement, the Vander Weele Group<sup>LLC</sup> - DLA team, led by Program Manager Steven Pasichow and Project Manager Kevin

Mullins, will work with NJLWD to plan and perform our internal control review in four phases:

Phase	Task
I.	Planning
II.	Risk Assessment
III.	Programmatic Review
IV.	Reporting

## B. Planning

The planning phase will allow the Vander Wee Group<sup>LLC</sup> - DLA team to evaluate the control environment and work with NJLWD to establish a plan of action including objectives, milestones, and previous performance measures.

The control environment is considered the tone and overall culture established by management with regards to communication of values, adherence to program and municipal mission statements, and the general standard of ethics expected from employees. The control environment helps the Vander Wee Group<sup>LLC</sup> - DLA team assess how well the culture supports the other, more specific internal control components.

During this phase, the Vander Wee Group<sup>LLC</sup> - DLA team will perform the following:

- Attend a kick-off meeting with representatives of NJLWD, with the intention of confirming the timeline of deliverables and to discuss other items including, but not limited to:
  - Engagement expectations;
  - Performance of UI Benefit Programs including strengths, weaknesses, and corrective measures to mitigate known weaknesses;
  - Coordinating access and systems training for the Vander Wee Group<sup>LLC</sup> - DLA team staff for NJLWD grant management system;
  - The preliminary project work plan including project schedules, timelines, and activities;
  - Identify any known red flags that should be brought to our attention from those within the operation; and
  - Other information as necessary.
- Review any audit reports, past assessments, or other previously performed monitoring service to determine efficiency of the UI Benefit Programs, or those of

similar operations, to help organize our approach to our program and compliance plan based on strengths, weaknesses and applicable risks identified.

- Review the applicable guidance standards that govern the proper use of UI unemployment benefit funds as well as those that dictate non-Federal entity programs such as 2 CFR Subpart D Post Federal Award Requirements and 2 CFR Subpart F Audit Requirements.
- Review organizational charts, or similar, to gain an understanding of the chain of command, authorities, accountabilities, and responsibilities, of the roles performed within the UI Benefit Programs including those that surround the accounting and oversight controls.

### C. Risk Assessment

The Vander Weele Group<sup>LLC</sup> - DLA team is determined to assess NJLWD's risk of performing and operating the UI Benefit Programs, the risk posed to public funds, both received and disbursed, and to the level at which established internal controls alone are adequate to mitigate or eliminate risks

According to the Integrity Oversight Monitor Guidelines, 2021 Update, "The risk assessment should include a review of the agency's ability to comply with Federal statutory and regulatory requirements as well as applicable state laws and regulations, including with regard to reporting, monitoring, and oversight, and a review of the agency's susceptibility to waste, fraud, and abuse."

The Vander Weele Group<sup>LLC</sup> - DLA team will perform the risk assessment in accordance with the Risk Assessment template provided by NJLWD. Steps to performing the risk assessment include, at a minimum, but are not limited to:

- Organizational leadership, capacity, expertise, and experience managing and accounting for Federal grant funds in general, and disaster recovery funds in particular;
- Input from the individuals/units that will be disbursing funds or administering the program;
- Review of existing internal controls and any identified weaknesses;
- Prior audits and audit findings from state or Federal oversight entities;
- Lessons learned from prior disasters;
- Sub-recipient internal control weaknesses, if applicable;

- Adequacy of financial, acquisition, and grants management policies and procedures, including technological capacity and potentially outdated financial management systems;
- Ability to complete timely, accurate and complete reporting;
- Experience with state and Federal procurement processes, value of anticipated procurements, and reliance on contractors to meet program goals and objectives;
- Potential conflicts of interests and ethics compliance;
- Amount of funds being disbursed to a particular category of sub-recipient and the complexity of its project(s); and
- Whether Federal or state guidelines provide guidance regarding the uses of funds (i.e., discretionary vs. restrictive).

#### D. Programmatic Review

The Vander Weele Group<sup>LLC</sup> - DLA team will utilize the Risk Assessment to develop a program review strategy to determine the effectiveness of the processes, procedures, and the controls surrounding the UI Benefit Programs.

The first step to our programmatic review is to understand the control activities, or specific actions the agency takes to reduce risk of achieving program objectives. This step includes:

- Analyzing and documenting the processes and procedures of the UI Benefit Programs, since inception, that were established and designed to prevent and detect fraud, waste and abuse;
- Interviewing personnel and performing procedural walkthroughs to understand the procedures in place;
- Reviewing all relevant written policies and procedures, program guides, or other internally memorialized publications to understand the breadth and depth of control activities.

Next, the Vander Weele Group<sup>LLC</sup> - DLA team will analyze the information gathered, organized, and used to make determinations as well as the effectiveness of communication among employees, among systems, and among employees and systems. For this step, the Vander Weele Group<sup>LLC</sup> - DLA team will perform minimal, specific testing procedures to evaluate:

- The effectiveness of UI Benefit Programs policies and procedures;
- Data collected and organized throughout the UI Benefit Programs' life cycle, and

- Information gathered from previous steps performed including the risk assessment, employee interviews, and walkthroughs.

The final component, monitoring, is the review of all internal control components to ensure that each are present and functioning as necessary. Within the timeframe of the engagement, the Vander Weele Group<sup>LLC</sup> - DLA team will conduct ongoing monitoring activities of the policies, procedures, processes, and controls in place, to detect and prevent instances of fraud, waste and abuse, and to ensure compliance with both Federal and state guidelines and objectives. Throughout the internal control review, all identified deficiencies will be disclosed to the NJLWD Program Manager and coupled with suggested corrective actions.

Based on the internal control review, and on documented and evaluated processes and procedures, including any suggested corrective action the Vander Weele Group<sup>LLC</sup> - DLA team will draft a confidential Unemployment Fraud Prevention and Detection Policy that is compliant with both non-Federal entity, governed by the Uniform Guidance, and COSO standards. We are able to include recommendations of next-step recovery actions to any discoveries of fraud, waste, and abuse uncovered during our normal course of work.

## E. Reporting

The Vander Weele Group<sup>LLC</sup> - DLA team will prepare monthly reports, quarterly reports, and additional reports, as requested, including the following, and will deliver them by the specified dates below:

Task	Deliverable	Due Date
<b><u>Task 1: Integrity Monitor Monthly Report</u></b>	The Vander Weele Group <sup>LLC</sup> - DLA team will submit a monthly report to Theresa Vallely, the NJLWD Contract Manager on the first of each month for the preceding month that will outline identified deficiencies.	January 1, 2022 February 1, 2022 March 1, 2022 March 31, 2022*
<b><u>Task 2: Risk Assessment</u></b>	The completed risk assessments of UI Benefit Programs at minimum addressing the items in the Risk Assessment attached hereto in Attachment 3 of the IMEQ proposal.	January 31, 2022
<b><u>Task 3: Unemployment Fraud Prevention and Detection Policy</u></b>	The Vander Weele Group <sup>LLC</sup> - DLA team will provide the first and final confidential drafts of the Unemployment Fraud Prevention and Detection Policy by their respective dates.	March 15, 2022 March 31, 2022

<p><b>Draft Quarterly Integrity Monitor Reports</b></p>	<p>a) Provide a memorandum explaining the specific services rendered during the quarter and any findings of waste, fraud, or abuse using the Quarterly Report template.</p> <p>b) If the Quarterly report contains any finding(s) of waste, fraud or abuse, the Using Agency has an opportunity to respond within 15 days after receipt.</p>	<p>December 30, 2021 March 31, 2022</p>
<p><b>Final Quarterly Reports*</b></p>	<p>Consistent with the Engagement Query, within 15 days after the issuance of the draft quarterly report, we will include any comments from the Using Agency to the State Treasurer, who shall share the reports with the GDRO, the Senate President, the Speaker of the General Assembly, the Attorney General, and the State Comptroller.</p>	<p>January 15, 2020 April 15, 2022*</p>
<p><b>Additional reports requested by the Office of the State Comptroller ("OSC")</b></p>	<p>Upon request, we will provide additional reports, such as;</p> <p>a) Reports that will assist OSC in evaluating whether there is waste, fraud, or abuse in COVID-19 Recovery Programs administered by the Using Agencies;</p> <p>b) Reports that share any corrective action plan(s) prepared by the Using Agencies to evaluate whether those corrective plan(s) have been successfully implemented; or</p> <p>c) Immediate reports of waste, fraud, abuse and misuse of COVID-19 Recovery Funds directed to the GDRO, OSC, the State Treasurer, the State Contract Manager, and the Accountability Officer.</p>	<p>As Requested by March 31, 2022</p>

\* We understand that the Engagement is set to expire on March 31, 2022, and will work with NJLWD to complete draft and final quarterly reports to meet these deadlines, as required.

It should be noted that instances of fraud, waste, and abuse, although specified within the monthly and quarterly status reports, will be communicated immediately to the GDRO, OSC, the State Treasurer, and State Contract Manager, and the Accountability Officer.

#### F. Ongoing Quality Assurance

We believe that quality is derived not only from hiring experienced staff but from standardizing processes to ensure consistent delivery of quality deliverables. For this reason, the Vander Weele Group<sup>LLC</sup> - DLA team breaks down each element of the required activities and lays out for its team the required processes with template language for

governing authorities, findings, recommendations, and corrective action plans. As time allows, we employ a peer review process to ensure colleagues agree that the evidence supports findings, and to promote consistency. Our Project Manager has experience in working with other New Jersey government agencies and in providing reports within the given timeline. All reports will be reviewed by the Program Manager and Project Manager before being submitted to NJLWD.

## IV. PROJECT COMMUNICATIONS

### A. Reporting

As stated above, we will provide reports to NJLWD in accordance with the requirements as stated in the Engagement Query. These will cover, at a minimum, progress toward each of the identified milestones, status of compliance reviews, and trends in significant findings. We will also make schedules, status reports, and draft and completed reports available to NJLWD through a password-protected website or electronic tool.

### B. Status Meetings

We will meet with NJLWD for the kickoff meeting and, thereafter, participate in regular communication meetings with NJLWD every week—or on a frequency that NJLWD prefers—to discuss outstanding items, potential issues, upcoming testing, and the overall progress of the engagement.

### C. Other Communications

As part of this engagement, we will:

- Follow up with questions regarding specific funding decisions and application approvals as it relates to the distribution of funds;
- Facilitate the exchange of ideas with NJLWD, including both past and present lessons learned, to promote operational efficiency for future relief funding;
- Promote cooperation and communication among Integrity Monitors engaged by other Recovery Program participants (e.g., to guard against duplication of benefits);
- Simultaneously report any issues of fraud or criminal conduct immediately to the Accountability Officer, NJLWD Contract Manager, the Office of the State Comptroller, (“OSC”), the Governor’s Disaster Recovery Office (“GDRO”), and the State Treasurer.

## V. BUDGET

We propose a total contract cost of \$172,310.98. Our budget reflects an emphasis on planning, execution, and oversight to support the fieldwork and realistic time frames to allow for quality work. Although we request flexibility to move hours between tasks, the following table provides underlying estimates to support our pricing.

Phase I: Planning		Fieldwork		Reporting	
RFQ Title	Rate	Hours	Amount	Hours	Amount
Partner / Principal / Director (1)	\$ 237.50	1.00	\$ 237.50	-	\$ -
Partner / Principal / Director (2)	\$ 237.50	1.00	\$ 237.50	-	\$ -
Program Manager (1)	\$ 229.81	1.00	\$ 229.81		\$ -
Program Manager (2)	\$ 229.81	1.00	\$ 229.81		\$ -
Project Manager	\$ 170.00	1.00	\$ 170.00	1.50	\$ 255.00
Supervisory / Senior Consultant	\$ 211.06	4.00	\$ 844.24	2.00	\$ 422.12
Subject Matter Expert (1)	\$ 192.54	8.00	\$ 1,540.32	4.00	\$ 770.16
Subject Matter Expert (2)	\$ 192.54	8.00	\$ 1,540.32	-	\$ -
Technical Analyst	\$ 135.00	-	\$ -	-	\$ -
<b>Phase Totals:</b>		<b>25.00</b>	<b>\$ 5,029.50</b>	<b>7.50</b>	<b>\$ 1,447.28</b>

Phase II: Risk Assessment		Fieldwork		Reporting	
RFQ Title	Rate	Hours	Amount	Hours	Amount
Partner / Principal / Director (1)	\$ 237.50	-	\$ -	2.00	\$ 475.00
Partner / Principal / Director (2)	\$ 237.50	-	\$ -	2.00	\$ 475.00
Program Manager (1)	\$ 229.81	-	\$ -	8.00	\$ 1,838.48
Program Manager (2)	\$ 229.81	-	\$ -	8.00	\$ 1,838.48
Project Manager	\$ 170.00	10.00	\$ 1,700.00	16.00	\$ 2,720.00
Supervisory / Senior Consultant	\$ 211.06	20.00	\$ 4,221.20	5.00	\$ 1,055.30
Subject Matter Expert (1)	\$ 192.54	45.00	\$ 8,664.30	10.00	\$ 1,925.40
Subject Matter Expert (2)	\$ 192.54	45.00	\$ 8,664.30	10.00	\$ 1,925.40
Technical Analyst	\$ 135.00	65.00	\$ 8,775.00	16.00	\$ 2,160.00
<b>Phase Totals:</b>		<b>185.00</b>	<b>\$ 32,024.80</b>	<b>77.00</b>	<b>\$ 14,413.06</b>

Phase III: Programmatic Review		Fieldwork		Reporting	
RFQ Title	Rate	Hours	Amount	Hours	Amount
Partner / Principal / Director (1)	\$ 237.50	-	\$ -	2.00	\$ 475.00
Partner / Principal / Director (2)	\$ 237.50	-	\$ -	2.00	\$ 475.00
Program Manager (1)	\$ 229.81	-	\$ -	8.00	\$ 1,838.48
Program Manager (2)	\$ 229.81	-	\$ -	8.00	\$ 1,838.48
Project Manager	\$ 170.00	50.00	\$ 8,500.00	16.00	\$ 2,720.00
Supervisory / Senior Consultant	\$ 211.06	50.00	\$ 10,553.00	5.00	\$ 1,055.30
Subject Matter Expert (1)	\$ 192.54	110.00	\$ 21,179.40	10.00	\$ 1,925.40
Subject Matter Expert (2)	\$ 192.54	110.00	\$ 21,179.40	10.00	\$ 1,925.40
Technical Analyst	\$ 135.00	145.00	\$ 19,575.00	16.00	\$ 2,160.00
<b>Phase Totals:</b>		<b>465.00</b>	<b>\$ 80,986.80</b>	<b>77.00</b>	<b>\$ 14,413.06</b>

Phase IV: Reporting		Fieldwork		Reporting	
RFQ Title	Rate	Hours	Amount	Hours	Amount
Partner / Principal / Director (1)	\$ 237.50	-	\$ -	4.00	\$ 950.00
Partner / Principal / Director (2)	\$ 237.50	-	\$ -	4.00	\$ 950.00
Program Manager (1)	\$ 229.81	-	\$ -	8.00	\$ 1,838.48
Program Manager (2)	\$ 229.81	-	\$ -	8.00	\$ 1,838.48
Project Manager	\$ 170.00	-	\$ -	16.00	\$ 2,720.00
Supervisory / Senior Consultant	\$ 211.06	-	\$ -	16.00	\$ 3,376.96
Subject Matter Expert (1)	\$ 192.54	-	\$ -	32.00	\$ 6,161.28
Subject Matter Expert (2)	\$ 192.54	-	\$ -	32.00	\$ 6,161.28
Technical Analyst	\$ 135.00	-	\$ -	-	\$ -
<b>Phase Totals:</b>		<b>-</b>	<b>\$ -</b>	<b>120.00</b>	<b>\$ 23,996.48</b>

**Proposal Totals: 956.50 \$ 172,310.98**

## VI. STAFFING

The Vander Weele Group<sup>LLC</sup> - DLA team has assembled a group of highly qualified individuals with relevant experience to assist NJLWD with oversight, compliance, and advisory services regarding unemployment insurance benefit programs and those who receive the benefits. Each member of our team has been carefully selected to create a balanced team capability and environment that provides experienced project management and leadership, a thorough understanding of the needs of NJLWD, and an understanding of major components of the scope of work for this engagement query.

The proposed staff includes:

**Maribeth Vander Weele** is President of the Vander Weele Group<sup>LLC</sup>, a Chicago firm that specializes in grants oversight. Maribeth is a results-oriented professional known for her ability to drive strategic and tactical change in large organizations. She has overseen large scale grants oversight programs in 24 states. A former award-winning journalist for the *Chicago Sun-Times*, she authored *Reclaiming Our Schools, the Struggle for Chicago School Reform*, which became the roadmap for reform of the nation's third largest school system. A key member of the system's 1995 turnaround team, she spearheaded multiple integrity initiatives, among them revamping the Internal Audit division. In 1998, Chicago Mayor Richard Daley appointed Maribeth as Inspector General of Chicago Public Schools. Also in that year, she served as President of the Illinois Association of Inspectors General. In 2012, she was appointed as the outsourced Inspector General of the Public Building Commission of Chicago, which manages hundreds of millions of dollars of public construction projects. Also, that year, Cook County Board President Toni Preckwinkle appointed Maribeth to the Cook County Board of Ethics. Maribeth has been profiled in the *Wall Street Journal*, *Teacher Magazine*, and in the 1998 book, *Extraordinary Women Making a Difference*. Maribeth has lectured for institutions such as TIAA-CREF; APEC, a group of Fortune 500 Security Directors; the Association of Inspectors General, and the World Bank on data analytics, including the analytics of 65 million data points in the payroll of a major government institution.

**Joseph DeLuca** has overseen multiple flagship integrity oversight and grants-related projects over a career that spans more than four decades. Mr. DeLuca knows and understands the working environment of government agencies as well as other state and local law enforcement agencies, prosecutors, and emergency service providers. Joseph DeLuca is the founding principal of DLA and a leading expert in the disaster recovery integrity monitoring profession. Mr. DeLuca has served as an integrity monitor on projects such as the World Trade Center 9/11 cleanup, Superstorm Sandy response and recovery in both New York and New Jersey, and other disasters. He has helped design statewide legislation mandating the use of integrity monitors for various jurisdictions and has designed monitoring and oversight programs for public institutions across the country. In March 2020, in anticipation of the Federal pandemic recovery acts, DLA emerged as a thought leader on how local, county, and state governments can best prepare for the influx of Federal and state resources in response to the devastation caused by the pandemic. Mr. DeLuca is well-versed in and has presented on local, state, and Federal grant programs and the associated labyrinth of regulations for oversight and reporting. He is an expert

in designing systems and internal controls to prevent and detect fraud, waste, and abuse through deployment of a multi-disciplinary approach utilizing accountants, lawyers, investigators, analysts, and subject matter experts. There will be no learning curve for this team.

**Steven A. Pasichow** from DLA will serve as a Program Manager. He has served as the lead in DLA's engagements with Middlesex and Gloucester Counties pertaining to CRF funds, including their Small Business Relief Grant Programs. Steve is a Certified Inspector General and Certified Fraud Examiner with more than 40 years of investigative experience across a vast range of pressing issues such as corruption, fraud, conflicts of interest, cyber-crime, whistleblower retaliation, and police, employee, contractor, and vendor misconduct. He is a veteran leader of major public institutions whose excellence in leading complex projects and delivering top-notch results has earned him widespread recognition and various awards for outstanding performance over the course of his distinguished career. Steve retired as the Deputy Inspector General and Director of Investigations at The Port Authority of New York and New Jersey ("PANYNJ") after more than fifteen years with the office. Steve also led the PANYNJ's Fraud Prevention Program for major capital construction projects such as the World Trade Center Redevelopment Program, New Goethals Bridge, Bayonne Bridge Navigational Clearance Program, LaGuardia Airport Central Terminal Building Redevelopment Program, Lincoln Tunnel Access Program, and Hurricane Sandy Recovery Projects. He previously served for more than 26 years with the New York City Department of Investigation as an Assistant Commissioner and Inspector General of numerous city agencies, including managing the Integrity Monitors monitoring the Ground Zero cleanup following the September 11th terrorist attacks.

**Deb Wells** is the Vander Weele Group<sup>LLC</sup>'s Program Officer and also provides subject matter expertise on Federal regulations. She has served as the Director of Grants for schools serving two major charter school organizations and has experience in grant management and grant monitoring for multi-state programs. For 36 years she worked with the Federal government as the Senior Director of Financial Workforce Management for the Department of Defense. She has experience in fiscal management and the planning, programming, budgeting and execution of programmatic, special project and grant funds; as well as experience in Human Capital, Acquisition, Policy development and implementation, and Program Management. She led efforts in the design of the Base Realignment and Closure cost analysis model; the consolidation and oversight of the DoD FM Education and Training contracts (\$586M per fiscal year); the design, construction and implementation of the DoD FM Institute in Southbridge, MA; the consolidation of all DoD finance and accounting operations; and the establishment of the strategic human capital initiatives in FM. She was also instrumental in the drafting and receipt of new Congressional legislation in the Fiscal Year 2012 *National Defense Authorization Act* which mandated the DoD Financial Management Certification Program to strengthen the public sector's confidence in the Department's overall fiscal management. She is fully proficient in the application of the CARES, CSSRA and ARPA programs.

**Kevin Mullins** is a Project Manager and the Head of Forensic Accounting at DLA. He is an accounting professional specializing in financial and forensic investigations. He is a Certified Fraud Examiner with nearly 20 years of multidisciplinary experience in the accounting industry, specifically in the areas of forensic accounting and auditing. He has led various project teams of

all sizes, executing audit plans designed to detect not only fraud and noncompliance, but also to identify cost recoveries and areas for improvements in internal controls. With Kevin as Project Manager, there will be no learning curve when it comes to the policies and procedures and key people in place for administering CRF funds. He is familiar with the tight deadlines, forms, and reporting structure and will be an invaluable member of the team.

**Michael Dundas** is a Forensic Audit Subject Matter Expert with DLA contributing almost two decades of experience in the public sector within audit divisions of the Port Authority of New York and New Jersey to the project team. He ensures compliance policy objectives are met through the creation of achievable and practical procedures and that all reviews are performed efficiently and effectively and in a collaborative fashion.

**Matthew Gavin** is a Senior Consultant with DLA who has collaborated with clients ranging from Fortune 500 companies undertaking large-scale construction and redesign projects to state-run governmental agencies responsible for planning, designing, and developing public works projects. He has served as the Senior Forensic Accountant in DLA's engagements with Middlesex Counties, pertaining to CRF funds, including their Small Business Relief Grant Programs, CARES Act audit and compliance assistance, Emergency Rental Assistance monitoring, and assistance in program implementation. Matt excels at bringing a detailed eye to client- and industry-specific needs throughout his work leading audits, reviews, and research, and develops business and process improvement recommendations suited to both client and industry needs.

**Salvatore Ubaldini** is a Senior Forensic Accountant in the DLA team and is a licensed Certified Public Accountant and Certified Fraud Examiner who brings more than 8 years of experience in public accounting, auditing, and forensic accounting with a focus on financial and forensic investigations. Salvatore has a strong foundation in grant disbursement audits, as he has previously worked with various government agencies throughout New Jersey regarding their review of COVID-19 related grant relief funds.

**Alisha Pruitt, MBA, CFE**, is a senior accountant and auditor with knowledge of Generally Accepted Accounting Principles (GAAP), Generally Accepted Government Auditing Standards (GAGAS), Yellow Book, and government cost allowability regulations/statutes. Currently a Senior Auditor for the North Carolina Department of Transportation, she is planning to join the Vander Weele Group<sup>LLC</sup> shortly. Currently, Alisha coordinates, evaluates, and audits procedures and practices of grant sub-recipients and vendors for compliance with Federal grant requirements, governmental accounting standards, and applicable local, state, and Federal statutes and policies. She reviews and approves indirect cost rates, direct labor rates, non-salary direct costs and proposed fees for prime and sub-contractors awarded Professional Service contracts. She reviews indirect cost rate proposals submitted by each consultant including CPA workpaper reviews for cognizant approvals.

Our knowledge, skills, abilities, and competencies will reduce transition and performance risks for this Engagement Query initiative. Our organizational structure allocates the right resources and the right communication channels needed to ensure quality performance and responsiveness throughout the period of performance.

The DLA founding principal will oversee this contract with support from the Vander Weele Group<sup>LLC</sup> CEO. This reinforces executive engagement with the project team, enabling quick allocation of corporate resources.

Our Project Manager, Kevin Mullins, will provide regular status reports to executive management detailing the status of deliverables, schedule, quality metrics, staffing requirements, and any issues or corrective actions. Desired intervals of such status reports can be discussed during the kick-off meeting.

The remaining project team will consist of one Program Manager from each team; two Subject Matter Experts 1 (forensic accounting); two Subject Matter Experts 2 (grants accounting and monitoring) and one or more Technical Analysts. Each member of the project team will have a clearly defined set of responsibilities. This creates an environment of clear roles and job satisfaction, which results in better performance and higher client satisfaction. When people know what they are supposed to do and understand their roles, they are more empowered to be innovative and perform exceptionally.

## VII. PAST PERFORMANCE

### DLA Clients

#### A. Middlesex County, New Jersey COVID-19 Stimulus Funds Application Monitoring (Ongoing)

Middlesex County ("Middlesex") received CARES Act funds in the amount of \$143,966,956.60 from the United States Treasury (the "Stimulus Funds"), to be used to reimburse the County and the municipalities and agencies within the County (the "Municipalities") due to economic damage caused to them by the Coronavirus. The Stimulus Funds were also to be used for the benefit of those businesses that have been impacted by COVID-19.

Middlesex County engaged the services of DLA to assist the County in its development, implementation, management and oversight of the establishment of three economic relief programs used to distribute Stimulus Funds to County Municipalities and small businesses in need of financial assistance. These programs were developed and implemented to quickly and effectively distribute the Stimulus Funds to those in immediate need.

The first program, the Municipal Reimbursement Program for County Municipalities, reimbursed County Municipalities for COVID-19 related costs including, but not limited to, vendor expenses, salary and fringe expenses, and necessary improvement projects. DLA's services for this program included:

- Providing advice and assistance regarding the interpretation of the constantly changing and updating U.S. Treasury Department's guidance on the CARES Act and its application to various situations and applications;

- Performing audits of CARES Act Reimbursement applications submitted by County Municipalities to:
  - a) Identify any weaknesses in the application process that might create an opportunity for the approval of ineligible reimbursements or those that might contain fraudulent expenses; and
  - b) Provide additional validation and vetting for expenses and to ensure there is adequate justification and documentation to support the use of CRF.
- Recommending to the County any revisions to the application review process.
- Performing a review of individual applications, on an as-needed basis, to provide additional validation and vetting for expenses.

Additionally, DLA was requested to assist the County in establishing its own CARES Act Small Business Emergency Assistance Grant Program (“SBEA Grant Program”). As a result, the County established the Small Business Relief Grant Program (“SBRG”) which provided assistance to small businesses within the County that fall within the County’s imposed eligibility restrictions, including but not limited to a net income limit of \$1M, a limit of fifty active employees, and a record of negative impact caused by COVID-19, and Small Business Grant Program (“SBGP”) for County businesses with 10 or fewer employees. The SBGP was funded by Community Development Block Grant (“CDBG”) funds. DLA’s services for these programs included;

- Developing an understanding of the requirements surrounding the SBEA Grant Program established by the New Jersey Economic Development Agency (“NJEDA”) and which of the NJEDA requirements were implemented on top of any underlying Federal requirements;
- Advising the County on choosing ‘best practice’ requirements from the CARES Act and/or NJEDA program to most adequately and efficiently accomplish the County’s goals in assisting County businesses with financial assistance
- Performing a sample review of the SBEA Grant Program applications submitted to the County to identify any weaknesses in the application review process that might create an opportunity for the approval of ineligible grants or those that might contain fraudulent information;
- Recommending to the County any revisions to the application review process; and
- Conducting due diligence on SBRG applicants and its owner(s) seeking any negative information on them that might impact the approval of the application.
- Performing reviews of individual applications, on an as-needed basis, to provide additional validation and vetting for expenses.

DLA’s services, aside from those specified above, ensured that there were adequate controls instituted for the programs and that there was adequate documentation and transparency

and other justification for the expenditure of the relief funds, to prevent fraud, waste, and abuse and to protect against disallowances or claw backs by the Federal and/or state governments.

**Project Description: ERAP**

As a result of the *Consolidated Appropriations Act of 2021* (“CARES Act II), enacted on January 3, 2021, to provide further assistance to those impacted by COVID-19, one component, the Emergency Rental Assistance program, made available \$25 billion to assist households that are unable to pay rent and utilities due to the COVID-19 pandemic. Middlesex County was one of the eligible counties to receive funds directly from the U.S. Treasury receiving roughly \$25M to provide assistance to eligible households through existing or newly created rental assistance programs.

The County engaged the services of DLA to assist the County in its development, implementation, management and oversight of their Emergency Rental Assistance Program to assist those in urgent need maximize the opportunity for relief. In establishing and implementing the program, DLA ensured that there were adequate controls instituted for the program, as well as adequate documentation, transparency, and other justifications for the expenditure of the relief funds to prevent fraud waste and abuse and to protect against disallowances or claw backs by the Federal and/or state governments.

Throughout the process of ERAP, DLA’s services have included:

- Providing advice on the interpretation of the U. S. Treasury Department’s guidance on the Rental Program and its application to various situations and applications.
- Assisting with the design of the controls, procedures, and thresholds governing the County’s Rental Program, including: the design of the eligibility criteria, application form, listing of documents that should be required to be submitted with an application, the agreement and certification that renters and landlords will be required to execute as part of the application process, etc.
  - This assistance would include the development of an on-line application, review, approval, and auditable process within a public accessible portal in OpenGov.
- Performing the necessary, and adequate, due diligence reviews of applicants (including renters and landlords) to minimize opportunities for fraud, waste, and abuse.
- This includes taking the appropriate steps to ensure there are no duplication of benefits by the renters and/or landlords, by accessing other available data on what relief funds were provided to the renters and/or landlords.
- Performing audits, based both on a random sample and on an as-needed basis, to provide additional validation and vetting for expenses, to ensure adequate

justification and documentation to support the use of Relief Funds, and to identify any weaknesses in the application review process that might create an opportunity for the approval of ineligible expenses or those based on fraudulent information

- Assisting in the full implementation of the Rental Program to ensure a prompt and expedited response from County Government.
- Performing any other professional services to the County as requested to assist with their implementation, management, and oversight of the Rental Program.

**Project Description: ARPA**

The American Rescue Plan Act of 2021 (“ARP”), which was signed into law on March 11, 2021, provides approximately \$1.9 trillion in spending to address the continued impact of COVID-19. The ARP is a follow up to the Coronavirus Aid, Relief, and Economic Security Act (the “CARES Act”), which became law in late March 2020, and that part of the Consolidated Appropriations Act of 2021 (the Consolidated Appropriations Act) devoted to COVID-19 relief, which was adopted in late December 2020.

The County also received \$160,258,621 in ARP State and Local Coronavirus Fiscal Recovery Funds and is in the process of devising plans and programs on how best to utilize these ARP funds. In the interests of preventing, and detecting fraud, waste, and abuse involving any of the Stimulus Funds received by the County, and that the County disbursed to the Municipalities and businesses, the County retained the services of DLA to provide guidance and to assist the County in its establishment of the program.

DLA’s goal, in addition to preventing fraud, waste, and abuse and protecting against disallowances or claw backs by the Federal and/or state governments, is to ensure the program effectively implements adequate controls and procedures, collects and stores adequate and sufficient documentation, and provides reasonable and transparent justifications for disbursed relief funds.

DLA has begun to assist County officials in the design and oversight of new and needed programs with ARP funds and to protect the County and its officials financially and reputationally consistent with all Federal, state and Local guidelines by providing the following services:

- Providing advice on the interpretation of the U.S. Treasury Department’s guidance on the American Rescue Plan (ARP) and its application to various programs, eligible uses of the ARP funds, and other situations, as they may arise.
- Performing random audits of ARP expenditures submitted to the County by sub-grantees and/or other third parties, or by the County to the U.S. Treasury, to provide additional validation and vetting for expenses and to ensure there is adequate justification and documentation to support the use of ARP funds.

- Providing the County any other assistance or services they request pertaining to the ARP.

## B. Gloucester County, New Jersey CARES Act Oversight

DLA just completed its first contract, (and was recently notified that it is being awarded a new contract for oversight of American Rescue Plan Act funds) providing professional services including background investigation services to Gloucester County, New Jersey as it relates to the expenditure of CDBG (Community Development Block Grant) funding related to the Coronavirus response. DLA provided advisory services, including assisting with the design and implementation of their small business grant program and oversight services, including the design of due diligence protocols as well as performance of due diligence and audits, to ensure compliance with Federal regulations and guidance issued in the expenditure of these funds similar to the work being performed for Middlesex County as described above.

## C. Cities for Financial Empowerment Fund

DLA was engaged by the Cities for Financial Empowerment (“CFE”) Fund last year to perform a thorough review and analysis of the CARES Act to determine if language exists that might support local and state governments using CARES Act money for financial empowerment initiatives including, but not limited to, one-on-one financial counseling and banking access programs for low- and moderate-income individuals impacted by COVID-19. Additionally, DLA performed a thorough review and analysis of documentation released by the Federal government that provides clarification and guidance on the permissible use of CARES Act money. As a result of this research, we provided a guide summarizing the CARES Act and related documents highlighting language that appears to support the use of CARES funding for financial empowerment initiatives, specifically offering details on the direction and tactics CFE Fund grantees can use in their efforts to secure CARES funding. Finally, we have presented the findings to CFE Fund staff and will also present to grantees, upon request, through virtual learning community events.

## D. Bloomberg Philanthropies

Since the onset of the Coronavirus pandemic and subsequent stay-at-home orders, DLA has teamed with Bloomberg Philanthropies to provide advisory services to the Conference of Mayors. In early April, DLA presented at the webinar entitled “COVID-19 Local Response Initiative: City Fiscal Tracking and Federal Reimbursement.” DLA worked alongside Rose Gill, Principal at Bloomberg, to outline critical steps to take and available resources and service offerings for governments in crisis response. The Bloomberg program has highlighted established best practices and provided to city leaders tutorials on how to apply for and receive aid, and also how to monitor expenses to ensure proper accounting. These new supports are delivered through a partnership between Bloomberg Philanthropies and the United States Conference of Mayors and is part of the Bloomberg Philanthropies COVID-19 Local Response Initiative. DeLuca Advisory Services was part of a team of companies

tapped by Bloomberg Philanthropies to generate a robust set of support services and resources to help local leaders combat the Coronavirus and protect the social and economic well-being of cities.

#### E. A Civic and Social Organization

DLA continues to provide compliance related consulting services to a civic and social organization (“C&SO”) (whose name cannot be disclosed) that specializes in engaging and distributing pertinent information to hard-to-reach communities. The C&SO, which has been contracted by several municipal groups, created a COVID-19 outreach program using a hybrid of both in-person and remote sources to connect with hard-to-reach residents through the use of door knocking and mobile outreach strategies to distribute knowledge and educational tools of, as well as advertise the availability of, COVID-19 vaccinations to the communities in which they are contracted. Compliance and consulting services provided by DLA included:

- Conducting an initial risk assessment and review internal controls, policies, and procedures;
- Advising and training, on integrity, compliance, ethics, best practices and applicable Federal guidelines;
- Review existing and amend and improve Code of Conduct, as well as other internal compliance documentation as seen fit;
- Develop a sampling methodology and perform audit testing procedures to ensure control compliance;

#### Vander Weele Group<sup>LLC</sup> Clients

#### F. Illinois State Board of Education, Division of Federal and State Monitoring

Note: This refers to two contracts and separate projects, monitoring Chicago Public Schools and nine other large districts in Illinois.

**Reference:** Matthew Ulmer, Director, Federal and State Monitoring, (217) 782-7970, mulmer@isbe.net

**Project Timeframe:** 2018 - present

**Project Dollar Amount:** Current contracts: \$2,556,434; Historical: \$481,577

**Location:** Chicago and throughout Illinois

**Project Descriptions:** This engagement, which currently involves monitoring nearly \$1 billion in CARES ACT and related grants funding for Chicago Public Schools, began on May 7, 2018, when the Illinois State Board of Education (ISBE) engaged the Vander Weele Group<sup>LLC</sup> to create and execute a risk-based program to monitor the expenditure of Federal grants distributed by ISBE to Chicago Public Schools District 299. Over two years, during FY18 and FY19, our team monitored \$62.2 million in grants expended at Chicago Public Schools for elementary and early childhood education. In the first year, the team developed program infrastructure, reviewed grant distribution and management processes in three Central Office units, and identified schools to be monitored. We monitored 33 district-operated schools and 12 charter schools funded through Chicago Public Schools (CPS). In the first year, our firm identified 74 findings of non-compliance resulting in \$245,366 in questioned costs. This year, our team is conducting 60 fiscal reviews of schools and the Central Office. Our team created fiscal monitoring tools to gauge compliance with grant requirements, including but not limited to *2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (“Uniform Guidance”), the CARES Act, and multiple education-related statutes. Examples of testing include gauging the allowability of costs, Time and Effort, adherence to budgets, appropriateness of parental involvement expenditures, timeliness of spending, coding of expenditures, and effectiveness of internal controls. We also conducted program existence testing, reconciliations of accounts, and district reporting requirements. In 2020, the State awarded our firm an additional contract to monitor nine of the state’s other large districts.

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“The Group provided the experience, expertise, and staffing resources necessary to complete the challenging engagement... Overall, I was impressed by the thorough work performed by the Group, and I was pleased with the collaborative partnership the Group formed with myself and my staff during the engagement.”

**Matthew Ulmer, Director  
Federal and State Monitoring  
Illinois State Board of Education**

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#### G. Bureau of Early Intervention, Illinois Department of Human Services

**Reference:** Ann Freiburg, Chief, Ann.Freiburg@Illinois.gov Phone: (217) 557-5387  
Jennifer Grissom, Jennifer.Grissom@illinois.gov

**Project Timeframe:** 2015 - present

**Project Dollar Amount:** Current contract: \$7,673,600; Historical: \$5,282,324

**Location:** Throughout Illinois

**Project Description:** Annually since 2015, the Vander Weele Group<sup>LLC</sup> has monitored services provided to more than 19,000 children and families of children under age 3 with disabilities or developmental delays. Each year, our team monitors 25 Child and Family Connections Offices (CFCs), conducting both general and focused verification reviews, and individual therapy Providers/Payees in 16 individual categories of service. On behalf of the Illinois Department of Human Services, the Vander Weele Group<sup>LLC</sup> monitored nearly \$140 million in funds over a five-year period provided to more than 1,200 payees and the 25 CFCs.

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*"The team has become a true partner within the Illinois Early Intervention network by delivering more than monitoring services. It also has made a significant contribution to the development of the Illinois State Systemic Plan . . . I heartily recommend the Vander Weele Group as a competent, caring, and professional organization who is proven and well-versed in the complexities of compliance monitoring."*

**- Ann Freiburg, Chief  
Bureau of Early Intervention  
Illinois Department of Human Services**

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Our Monitors test compliance with grant laws, regulations, policies, and high-quality service delivery standards. Our unique and specific testing tools are designed to ensure adherence to state and Federal regulations. Our Monitors evaluate child file documentation and Individual Family Service Plans for families in early childhood settings. Upon completion of each review, Vander Weele Group<sup>LLC</sup> Monitors facilitate exit meetings with each grantee program team and review the results directly.

Our team provides guided technical assistance so that identified concerns are mitigated and addressed. In addition to exit reports, our team provides resources and require Early Intervention trainings when findings of non-compliance are identified. We conduct surveys to gauge family satisfaction. Our team has worked with the Illinois Department of Human Services in building better measures of family engagement and has assisted the program with improving reportable data through the State Systemic Improvement Plan. This assistance includes evaluating the fidelity of data collected, revising Early Intervention policies and procedures, and providing on-going technical assistance with the implementation of the revised meeting facilitation and family support policy and procedure.

#### H. Bureau of Early Childhood Education, Illinois State Board of Education

**Client Contact:** Tamara Sanders-Carter, [tasander@isbe.net](mailto:tasander@isbe.net)

**Project Timeframe:** 2020 - present

**Project Dollar Amount:** \$6,886,343

**Location:** Throughout Illinois

**Project Description:** In a five-year engagement, the Vander Weele Group<sup>LLC</sup> has been engaged to monitor Early Childhood programs funded through the State of Illinois' Prevention Initiative program. In FY21, our team monitored 96 programs representing a total funding of \$49,874,896. Program models include BabyTalk, Early Head Start, Nurse Family Partnership, Parents as Teachers, and Healthy Families Illinois. Grantees include Regional Offices of Education, Public School Districts, Charter Schools, Area Vocational Centers and other public or private entities experienced in delivering services to young children and their families. Our team is engaged to use three monitoring tools: the Prevention Initiative Compliance Checklist, the Home Visit Rating Scales, and the Infant / Toddler Rating Scale.

#### I. Bureau of Indian Education, U.S. Department of the Interior

**Reference:** Clients retired, but a Federal reference (CPARS) is attached.

**Project Timeframe:** 2005 – 2016

**Project Dollar Amount:** All contracts: \$3,916,941

**Location:** 23 States across the US

**Project Description:** In September 2011, the Vander Weele Group<sup>LLC</sup> was engaged by the Bureau of Indian Education (BIE) to monitor 183 schools in 23 states for compliance with the *No Child Left Behind Act* (NCLB) and the *Individuals with Disabilities Education Act* (IDEA). At the beginning of the monitoring engagement, we created a school self-assessment tool, a monitoring tool, a standardized report format, and other program materials. We completed the first year's 38 compliance reviews in a two-month period. We hired Lead Monitors who previously led or taught in K-12 institutions to spearhead the compliance monitoring site visits. They were supported by secondary Monitors with critical technological and writing skills. During site visits, Monitors reviewed further documentation, conducted interviews with administrators and business managers, observed classrooms for teacher-student engagement and environment, reviewed samplings of teacher files to verify teaching credentials, and led focus groups of parents, teachers, paraprofessionals and students to gain a more complete sense of not only schools' compliance with NCLB, but operations that helped or hindered their ability to provide quality education to children. By the end of the engagement, we completed 142 site visits

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*"You and your staff's commitment to Indian Education was demonstrated on many levels. The drive to dig deeper to find the source of noncompliance was and is critical in assisting schools to improve student achievement and close the achievement gap. Your staff's commitment to working through tough issues to arrive at the best approach to serve schools and Indian students was evident throughout this contract."*

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**Stanley Holder, Chief (now retired) of the Division Compliance, Monitoring and Accountability**

and multiple desk monitoring reviews. After Monitors returned from each school visit, they completed a complex 20- to 40-page report. Each report thoroughly detailed a school's compliance with NCLB and also contained narratives explaining the school's strengths and weaknesses, which ultimately influenced a school's ability to comply with the law. The reports detailed outcomes of classroom observations, provided important insights on the causes of non-compliance, and identified endemic problems at BIE schools, which helped the agency be a better partner to the schools under its jurisdiction.

In more than a decade of service to the BIE, our firm developed more than 50 manuals, training materials, reports, template forms, sample policies and procedures, and other materials to provide schools with technical assistance. We developed more than 100 pages of training on conducting fiscal and educational reviews of schools. We also designed monitoring tools and related materials for fiscal, Special Education, and other reviews.

#### J. Bureau of Indian Education, U.S. Department of the Interior

**Reference:** Clients retired, but a Federal reference (CPARS) is attached.

**Project Timeframe:** 2005 – 2016

**Project Dollar Amount:** All contracts: \$3,916,941

**Location:** 23 States across the US

**Project Description:** In September 2011, the Vander Weele Group<sup>LLC</sup> was engaged by the Bureau of Indian Education (BIE) to monitor 183 schools in 23 states for compliance with the *No Child Left Behind Act* (NCLB) and the *Individuals with Disabilities Education Act* (IDEA). At the beginning of the monitoring engagement, we created a school self-assessment tool, a monitoring tool, a standardized report format, and other program materials. We completed the first year's 38 compliance reviews in a two-month period. We hired Lead Monitors who previously led or taught in K-12 institutions to spearhead the compliance monitoring site visits. They were supported by secondary Monitors with critical technological and writing skills. During site visits, Monitors reviewed further documentation, conducted interviews with administrators and business managers, observed classrooms for teacher-student engagement and environment, reviewed samplings of teacher files to verify teaching credentials, and led focus groups of parents, teachers, paraprofessionals and students to gain a more complete sense of not only schools' compliance with NCLB, but operations that helped or hindered their ability to provide

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#### **K. Illinois Racing Board Foundation**

Since 2018, the Vander Wee Group<sup>LLC</sup> has supported the Illinois Racing Board Foundation (IRBF) to develop a grants monitoring and technical assistance program. The IRBF provides educational, occupational, and health-related services to the unique population of racetrack workers and their families. These workers typically live at the racetracks and migrate from one track to another during racing season. This project requires applying 30 ILCS 708 Grant Accountability and Transparency Act (GATA), the Uniform Guidance, and IRB rules, assisting in developing the Notice of Funding Opportunity and evaluating responses, creating a reimbursement template for grant recipients, creating quarterly and annual report templates, developing a grants monitoring program, and related tasks.

#### **L. Navistar International**

The Vander Wee Group<sup>LLC</sup> provided nearly 200 high-level, confidential investigative projects for Navistar, Inc., a Fortune 500 manufacturer with approximately 15,000 employees. Projects include forensic data analyses of approximately \$40 million in credit card expenditures. The Vander Wee Group<sup>LLC</sup> identified 145 suspect users, some of whom were criminally charged. After two years of analyses, this project resulted in savings to the corporation of \$16.3 million a year. Matters involved allegations of insider trading, kickbacks, Foreign Corrupt Practices Act violations, unauthorized diversion of scrap, conflicts of interests, procurement fraud, accounting fraud, self-dealing, and more.

#### **M. North Dakota Department of Public Instruction**

The Vander Wee Group<sup>LLC</sup> was recently engaged by the North Dakota Department of Public Instruction to provide training on the three funding streams of the Elementary and Secondary School Emergency Relief Fund.