

State of New Jersey
 Department of Treasury
 Integrity Monitoring Reporting Model
 For Quarter Ending 3/31/2015

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
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): \$58,303,194; Gilbane (LRRP): \$10,005,234 CB&I/Shaw: \$58,900,851 CGI: \$55,211,325 ICF: \$67,558,670 URS: \$20,096,853 HGI: \$67,739,989 Cohn Reznick: \$9,992,683	
6.	Contract/Program Person/Title	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	

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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.</p> <p>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.</p> <p>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.</p> <p>SGM, a grant tracking system, was developed by CGI. It has replaced the eGrant system developed by HGI.</p> <p>ICF provides strategic advice, program implementation, subject matter expertise and staff augmentation services to DCA.</p> <p>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	
9.	Amount Expended to Date	<p>Amounts are based on current invoice totals as of March 31, 2015:</p> <p>Gilbane (RREM): \$26,943,224; Gilbane (LRRP): \$5,050,734</p> <p>CB&I/Shaw: \$16,934,441</p> <p>CGI Federal: \$28,572,570</p> <p>ICF: \$26,383,791</p> <p>URS: \$5,543,381</p> <p>HGI: \$35,910,449</p> <p>Cohn Reznick: \$7,863,540</p>	
10.	Amount Provided to other State or Local Entities	N/A	
11.	Completion Status of Contract or Program	<p>Completion Status based on contract values and invoiced amounts as of March 31, 2015:</p> <p>RREM (Gilbane/CB&I Shaw/URS): approximately 36%</p> <p>LRRP (Gilbane): approximately 51%</p> <p>SIROMS/SGM (CGI): approximately 52%</p> <p>ICF: approximately 39%</p> <p>Cohn Reznick: approximately 79%</p>	

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12.	Expected Contract End Date/Time Period	RREM (Gilbane & CB&I Shaw): May 22, 2016 LRRP (Gilbane): September 30, 2015 CGI: May 24, 2016 ICF: May 24, 2016 Cohn Reznick: June 30, 2015	
13.	If FEMA funded, brief description of the status of the project worksheet and its support.	N/A	
14.	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)	Navigant's integrity oversight monitoring activity for the first Quarter 2015 focused principally on four areas: reviewing the invoices of the two RREM Contractors, Gilbane and CB&I ("the Contractors"), and their numerous subcontractors; attending and observing homeowner and Contractor meetings and inspections, providing feedback to DCA and the Contractors; continuing our comprehensive technical electronic analyses of RREM application data to identify potentially problematic files for further review; and investigating and making referrals to the Attorney General's office regarding RREM files we examined that raised potential fraud concerns. During this quarter, we conducted 23 meetings with DCA, Cohn Reznick, CB&I, Gilbane, CGI, ICF, RREM applicants, and officials from the Office of the Attorney General (see Appendix A for a list of government officials and Contractor staff with whom we had in-person or telephonic meetings).	
		<p>A. Invoice Review:</p> Throughout the Quarter, we continued reviewing the RREM and LRRP contractor invoices and their respective subcontractor invoices and are in the process of performing four targeted reviews of certain billings as follows: <ul style="list-style-type: none"> (1) analyzing hazmat subcontractor lab results billings; (2) reconciling billings charged by 3 subcontractors during the early hazmat inspections in July 2013; (3) reviewing inconsistent supporting documentation submitted by and collected from certain hazmat subcontractors; and (4) comparing and reconciling contractor purchase order prices and certain subcontractor invoices. 	

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		<p>As we reported in the prior quarter's report regarding the hazmat subcontractor that initially worked and billed on a time and materials basis and then switched to unit pricing, we have reviewed additional time and materials invoices that this subcontractor submitted to the Contractor for payment, which resulted in an updated time and materials billings total of \$1.94 million. These billings represent 727 hazmat inspections (447 asbestos and 280 lead inspections) conducted by this subcontractor. Approximately \$1.17 million of \$1.94 million were related to hourly billings for hazmat field inspections, review of the lab results on the hazmat samples obtained and submitted for testing and the subcontractor's preparation of the report to summarize the results of the field inspection and billings for lab test results. The remaining amount of the time and materials billings (approximately \$772K) relates to the lab testing costs for the various types of lead and asbestos samples obtain from the field inspections and out of pocket costs (mileage, tolls and postage). We have submitted a supplemental document request to the Contractor requesting the underlying supporting documentation, and the Contractor is still in the process of gathering the complete documents. In the interim, the Contractor provided sample supporting documentation for our review and reconciliation of the lab testing invoices, which included the subcontractor's inspectors' timesheets and an excerpt from an invoice summary that the subcontractor maintained. We are reviewing this sample documentation and will determine whether such documentation would be adequate and appropriate to provide for the subcontractor's time and materials invoices. We will follow up with the Contractor with our observations on the accuracy, adequacy and appropriateness of the supporting documentation.</p> <p>During the Quarter, we determined that there were three hazmat subcontractors who submitted invoices for "Standby Time" totaling \$63,800 that relate to July 2013, which was when the hazmat inspections for RREM applicants commenced. We followed up with the Contractor who engaged these subcontractors and DCA to inquire about the nature and extent of such Standby Time billings. The Contractor explained that, at the outset of the environmental assessments, there was an urgent need to get homes assessed for the presence of asbestos and lead, and as a result, the subcontractors arranged for inspectors to be available to inspect the anticipated number of homes. It appears that there were instances during this period when there were more inspectors than necessary for the actual homes that were assigned to be inspected, and that the subcontractors invoiced for the inspectors who were ready and standing by to conduct environmental assessments at applicant homes, even if they were not called upon to perform any inspections. We also followed up with DCA and provided them with the information related to the invoiced Standby Time, and DCA acknowledged that they are aware of these invoiced amounts. DCA also stated that such costs are being considered in DCA's ongoing cost recovery settlement discussions with Hammerman & Gainer, Inc. (HGI), a Contractor that DCA hired to design, develop and implement a cloud-based Management Information System to efficiently coordinate and schedule hazmat inspections for applicants, among other tasks. (HGI's contract was terminated by mutual agreement with DCA in January 2014, the State is pursuing all of its rights via AAA arbitration).</p> <p>During the Quarter, we continued with our ongoing review of the hazmat subcontractors' invoices and updated our invoice database with additional key data that is being utilized for our analysis. Our review noted that the details contained in each hazmat subcontractor invoice vary. When additional underlying supporting documentation Navigant requested from contractors is provided, we will incorporate this information into our invoice database to determine whether there are any potential billings that are not accurate or properly supported.</p>	

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		<p>Pursuant to our review of additional subcontractor invoices, we have identified additional unit pricing items and prices that do not appear on the Contractors' purchase orders or contracts with their subcontractors. We continue to summarize these potential discrepancies and follow up with the Contractors to obtain any amendments or updates to the existing subcontractors' contractual documents to supplement or supersede, if applicable, information that the Contractors have provided to us to date. Some of the requested supplemental data has been provided to date on a rolling basis by the contractors. DCA has assisted with our efforts to obtain the supplemental documentation as needed, and we regularly communicate with DCA to update or close out outstanding requests as necessary. When we receive all of the additional documentation, we will determine if only approved unit rates were billed in the invoices.</p> <p>We continue to update our Contractor and Subcontractor invoice database to compile relevant invoice details for further 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, 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.</p>	
		<p>B. Meetings and Inspections:</p> <p>During the Quarter, we reviewed relevant documentation available on SIROMS, conducted site visits and attended seven (7) meetings with RREM applicants and various RREM Program parties, including Housing Advisors and Contractors. The meetings consisted of 5A Meetings, and Step 8 Meetings. The meetings were organized and generally consistent across the different Housing Advisors and the two RREM Contractors. The documentation provided to the applicants at the meetings was generally consistent and included the most current documentation available on SIROMS. It was evident that the concerns and findings we communicated to the Contractors in the previous quarter continue to be addressed. As compared to the prior quarter, there was a more consistent meeting structure and agenda followed by each of the contractors in their meetings with the homeowners. All necessary documentation was appropriately covered and explained by each Contractor representative, and the owners indicated that they understood the documents and the program requirements.</p>	

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		<p>Prior to, and 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. The meetings were held at multiple locations, including the applicant’s damaged home, and the Housing Recovery Centers (“HRC”) located within each county.</p> <p>The 5A meetings included the applicant and a Contractor’s representative, and focused on the documentation required to transition the applicant from the grant award phase to the construction phase of the RREM program. During each meeting, the Contractor’s representative ensured that each applicant had an opportunity to review the GAC, WIP and ECR prior to the meeting. The Contractor’s representative briefly described the paperwork, allowed for the applicant to ask any questions they had about the program and paperwork, and the applicant signed the required documents.</p> <p>We observed at these meetings some minor concerns that we communicated to the Contractors: 1) there was one instance of the Contractor asking the applicant to pre-sign documents prior to their completion in anticipation of future information being provided by the applicant to the Contractor’s representative so he could enter the information into the pre-signed document in order to save time. 2) the ECR’s included minor work (e.g. Fire Alarm) that had already been completed by the homeowners. Each of the above items were discussed with the Contractors. In future meetings Navigant will ensure that these concerns have been adequately addressed and will confirm the Contractor’s compliance with the revised procedures.</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>In the first analysis, Navigant performed a targeted review and analysis of RREM applications reflecting unexpected responses to specific questions in the original intake application relating to preliminary program eligibility. Specifically, Navigant sought to identify RREM applications in which:</p> <ul style="list-style-type: none"> (1) The applicant responded “no” or provided no answer within the intake application to the question: Was the property damaged by Superstorm Sandy? (2) The applicant responded “yes” or provided no answer within the intake application to the question: Has the property been foreclosed? (3) The applicant responded “no” or provided no answer within the intake application to the question: Did you register for FEMA for assistance for damage caused by Superstorm Sandy? (4) The applicant responded “no” or provided no answer within the intake application to the question: Was your total household income less than \$250,000 at the time of the storm? 	

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		<p>The first analysis was conducted using a multi-phased approach involving a review of 230 funded or waitlisted RREM applications in which at least one unexpected response to the questions listed above was present, reflecting the existence of a potential eligibility issue for the application at the intake stage. Our analysis was designed to evaluate how the program tracked the application, addressed and resolved the potential eligibility issues, and the adequacy of existing controls in place by the DCA Sandy Recovery Division ("SRD") to effectively address the eligibility issues.</p> <p>The first phase determined from the data available that 140 of the initial 230 files reviewed were eligible and were therefore not selected for any further review. The second phase of our analysis continues to be focused on the remaining 90 applications and incorporates a methodology which includes a review of the intake application, the documentation collected from the applicant, and the case log notes. Public record research, as necessary, will also be conducted regarding the damaged property. Navigant provided a list of the 90 homes and a supplemental document request to DCA for each respective finding. DCA has provided some preliminary responses and documents to date which reflect the existence of adequate controls to address the risks identified in these files, and Navigant will continue our review and testing of these controls as additional documentation is provided.</p> <p>In connection with our second technical analysis, Navigant completed a detailed initial review of changes made to RREM application address fields that were tracked within the SIROMS audit log as part of an analysis to identify any potentially suspicious changes to the applicant and damaged property address fields. Using a two-phased approach for this analysis, Navigant reviewed the SIROMS audit log data received from CGI and identified 1,863 funded or waitlisted applications in which a change was recorded for at least one of the address fields of interest. Among those 1,863 RREM applications, Navigant identified a prioritized subset of 723 applications during the first phase of this analysis based upon a risk ranking for the type of address change recorded, and our preliminary review determined that there can be a number of reasons for a valid address change. During the second phase of this analysis, to be conducted in the next Quarter, these applications will be the subject of further review to identify invalid or questionable address changes.</p>	
15.	<p>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.</p>	<p>Navigant obtained (1) from DCA, invoice-related documentation and revised RREM Policies and Procedures; (2) from the Contractors, regular schedules of their planned RREM applicant meetings and inspections, and some, but not all, of the invoice-related documentation we requested; (3) from Cohn Reznick, their updated recommendations matrix and internal monitoring reports; 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.</p>	

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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; designed and commenced two comprehensive technical electronic analyses of RREM application data to identify potentially problematic files for further review; and made referrals to the Attorney General's office regarding certain RREM files we examined that raised potential fraud concerns. Some of Navigant's referrals may be among those independently referred by DCA to the Attorney General's office.	
17.	Have payment requisitions in connection with the contract/program been reviewed? Please describe	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 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, 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 identified potential billing issues that require additional documentation to resolve. To complete this analysis, we will be examining additional back-up documentation from the subcontractors which we had not yet received as of the end of the Quarter.	
18.	Description of quarterly activity to prevent and detect waste, fraud and abuse.	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 instances of intentional or inadvertent overbilling 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; and our two technical electronic analyses of the universe of RREM applications sought to identify potentially problematic applications for further review using data extracts from SIROMS.	
19.	Provide details of any integrity issues/findings	As explained in paragraphs 14 and 18 above , our review of the invoices of the RREM Contractors and their subcontractors identified potential billing issues that we will continue to review and analyze in the next Quarter after receipt of additional documentation from subcontractors; our attendance at homeowner and RREM Contractor meetings and field inspections identified irregularities in the conduct of RREM 5A meetings that we have brought to the attention of DCA and the Contractors and that appear to have been corrected; our two technical electronic analyses of the universe of RREM applications using data extracts from SIROMS have identified two pools of applications for further review, one for eligibility issues and the other for potentially invalid changes in the applicant's address; and our review and investigation of RREM files identified certain files that raised potential fraud concerns, which we referred to the Attorney General's Office for further evaluation. Some of Navigant's referrals may be among those independently referred by DCA to the Attorney General's office.	

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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	
22.	Provide details of any actions taken to remediate waste, fraud and abuse noted in past quarters	N/A	
23.	Attach a list of hours and expenses incurred to perform your quarterly integrity monitoring review	For the Quarter Ending March 31, 2015: Total hours incurred: 866.69 hours Total fees incurred: \$239,371 Total expenses incurred: \$2,750	
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: June 30, 2015	

**Appendix A
Meetings Conducted
For Quarter Ending 3/31/2015**

I. Department of Community Affairs

- A. David Reiner Assistant Commissioner and Director of Disaster Recovery
- B. Sam Viavattine Deputy Director, Sandy Recovery Division
- C. Robert Bartolone Director, Office of Auditing
- D. Stephen P. Grady Assistant Director, Housing Recovery Programs
- E. Jerry O'Brien Principal Fiscal Analyst
- F. Theresa Vallely Audit Manager

II. Office of the Attorney General

- A. Lisa Morelli Deputy Attorney General
- B. Chris Iu Assistant Attorney General

III. Cohn Reznick

- A. Paul Raffensperger Principal
- B. Frank Banda Partner
- C. Kenneth Donohue Director and Senior Advisor
- D. Dean Krogman Director
- E. Carolyn Newcomb Manager
- F. Jennifer Fink Senior Consultant

IV. CGI Federal Inc.

- A. William Richey Deputy Program Director

**Appendix A
Meetings Conducted
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V. ICF, Inc.

- A. Al Blankenship Director
- B. Robert Hegner Program Manager

VI. Gilbane Building Company

- A. Robert Pumphrey Director, CAT Response (RREM Director)
- B. Samir Patel Project Executive
- C. Christopher Byk Project Manager
- D. James Melton Project Manager

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

- A. Tarek Bahgat Project Controls Manager
- B. Megan Rodriguez Project Manager
- C. Sean Fenlon Project Manager
- D. Adam Bevan Project Manager
- E. Jay Hetzgo Project Manager

VIII. Housing Recovery Center Personnel

- A. Denise Henry HRC Manager
- B. Vincent Rospond HRC Manager