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State of New Jersey
Education

P.O. Date: 1/17/2024

345095 ADMINISTRATIVE SERVICES

Release Purchase Order

G4018 Integrity Oversight Monitoring

Blanket Order Number

21-PROSV-01441:22

SHOW THIS NUMBER ON ALL
PACKAGES, INVOICES AND
SHIPPING PAPERS.

Agency Ref. #

V
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Vendor Number: [REDACTED]
Vander Weele Group LLC

2515 Waukegan Road, Suite 301
Bannockburn, IL 60015
maribeth@vanderweelegroup.com
773-929-3030

Vendor Alternate ID: [REDACTED]

Remit Address:
Maribeth Vander Weele
2848 Summit Ave
Highland Park, IL 60035
US

Email: njstart@vanderweelegroup.net
Phone Number: (773)929-3030

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NJDOE - BUDGET AND ACCOUNTING
100 Riverview Plaza - PO Box 500
Trenton, NJ 08625
US
Email: [REDACTED]
Phone: [REDACTED]

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NJDOE - BUDGET AND ACCOUNTING
100 Riverview Plaza - PO Box 500
Trenton, NJ 08625
US
Email: [REDACTED]
Phone: [REDACTED]

INVOICES: Direct invoices in DUPLICATE to the address shown above. TERMS
AND CONDITIONS set forth in our Bid or Quotation, on the reverse side hereof or
incorporated herein by reference become a part of this

ATTN: [REDACTED]

Solicitation (Bid) No.:					Payment Terms: Shipping Terms: Freight Terms: Delivery Calendar Day(s) A.R.O.: 0			
Item # 1 Class-Item 918-00 INTEGRITY MONITORING SERVICES OF COVID ARP SLFRF GRANT FOR LEARNING ACCELERATION Category 1 Program and Process Management Auditing , Year 1 - Hourly Program Manager Rate								
Quantity	Unit Price	UOM	Discount %	Total Discount	Tax Rate	Tax Amount	Freight	Total Cost
177.00	\$ 229.81	HOUR	0.00 %	\$ 0.00		\$ 0.00	\$ 0.00	\$ 40,676.37
Item # 2 Class-Item 918-00 Category 1 Program and Process Management Auditing , Year 1 - Hourly Consultant Rate								
Quantity	Unit Price	UOM	Discount %	Total Discount	Tax Rate	Tax Amount	Freight	Total Cost
558.00	\$ 135.00	HOUR	0.00 %	\$ 0.00		\$ 0.00	\$ 0.00	\$ 75,330.00

Letter of Engagement

December 20, 2023

Successful Bidder:

On behalf of the Department of Education, the State of New Jersey, Department of the Treasury hereby issues this Letter of Engagement to Vander Weele Group, LLC, pursuant to the Engagement Query issued on October 13, 2023 and Vander Weele Group, LLC 's proposal dated November 21, 2023.

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 \$330,483.85

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 Education (NJDOE)
[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 nationwide 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 (“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 Auditing, Financial Auditing and Grant Management, and Integrity Monitoring/Anti-Fraud services.

The New Jersey Department of the Treasury has established a pool of qualified Integrity Monitors for the oversight of COVID-19 Recovery Funds and COVID-19 Recovery Programs. Qualified Integrity Monitors are identified in G4018 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”), posted in the New Jersey Department of the Treasury eProcurement website, [NJSTART](#). Using Agencies shall engage with a qualified Integrity Monitors to carry out their responsibilities under E.O. 166. The terms and conditions of the Integrity Monitor’s executed State Contract shall apply to the Integrity Monitoring Engagement executed via this Engagement Query.

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

This Engagement Query is issued by the Department of the Treasury on behalf of The New Jersey Department of Education (NJDOE).

The purpose of this Engagement Query is for the NJDOE to procure the services of an Integrity Monitor ("IM") for **Category 3 services per Section 3.1.1 of the IOM RFO.**

A. Background

The COVID 19 pandemic interrupted learning for students across America. The Annenberg School at Brown University, published the following in working paper (<https://edworkingpapers.com/sites/default/files/ai22-521.pdf>):

Using test scores from 5.4 million U.S. students in grades 3-8, we tracked changes in math and reading achievement across the first two years of the pandemic. Average fall 2021 math test scores in grades 3-8 were .20-27 standard deviations (SDs) lower relative to same-grade peers in fall 2019, while reading test scores decreased by .09-.18 SDs. Achievement gaps between students in low-poverty and high-poverty elementary schools grew by .10-.20 SDs, primarily during the 2020-21 school year. Observed declines are more substantial than during other recent school disruptions, such as those due to natural disasters.

New Jersey has also seen lower assessment scores when compared to 2019 test scores. To assist Local Education Agencies (LEAs) provide services to help students impacted by the COVID 19 pandemic, the NJDOE has launched the New Jersey Learning Acceleration Program: High-Impact Tutoring Grant.

It is the intent of the New Jersey Learning Acceleration Program: High-Impact Tutoring Grant to support districts to provide high dosage, intensive tutoring by focusing on high-impact tutoring interventions for students that have been disproportionately affected by the pandemic. This grant opportunity prioritizes districts with elementary schools and their students in grades three (3) and four (4) but will allow Local Educational Agencies (LEAs) awarded the grant to serve additional students as needed and optimizes funding for targeted tutoring through identified vendors or organizations in addition to schools and districts that meet established, research-based criteria.

Based on the availability of State FY23 Federal ARP-GEER funds and State FY24 Federal SFRF funds, this single-year grant program will begin October 11, 2023 and will end on August 31, 2024. Applicants may apply for up to \$768,000 in funds based on a tiered system of student enrollment correlated with maximum funding levels.

This program will respond to lost student instructional time by funding a competitive grant program open to school districts for before-school, after-school, and summer learning programs. Public school districts, renaissance schools, and charter schools will all be open to apply for this grant and will implement evidence-based tutoring and learning programs identified by the NJDOE. To

ensure that districts of all sizes receive consideration for funding, districts are grouped in competitive brackets by enrollment size and percent of students proficient on the New Jersey Student Learning Assessments for ELA and math in grades 3 and 4. Under this model, similarly sized districts with comparable student performance levels would compete against one another for the limited funds.

It is anticipated that \$51,958,083 will be awarded to 394 grantees for tutoring interventions out of a possible 556 LEAs that serve third and fourth grades. That includes \$16,958,083 in ARP GEER funds (FY23 Budget) and \$35,000,000 from SFRF (FY24 budget). Awards are anticipated to be made within by the end of the calendar year.

Application forms developed by the NJDOE and User Manual related to this program are attached to this Engagement Query at Attachment 5

All information will be available electronically for the selected Integrity Monitor.

Integrity Monitor must complete all deliverables by September 30, 2024. The NJDOE retains the right to amend this contract to extend or modify the deliverables and the end date to account for additional rounds of funding or no cost extensions offered to LEAs receiving Learning Acceleration grants.

II. SCOPE OF WORK REQUIREMENTS

A. Project Description

The Integrity Monitor will be provided a listing of school districts accepting funds to support costs of Learning Acceleration. The Integrity Monitor shall select a sample to monitor and shall not select the same school districts that the NJDOE has identified to be monitored by NJDOE or other Integrity Monitors for any NJDOE program during the 2023-24 school year. A list of districts that have been selected will be provided once grant awards are finalized by the end of the calendar year.

It is expected that the sample will be evenly divided among the three (3) regions of the state – North, Central, and South. It is expected that between 20 and 40 school districts receiving ARP SFRF/GEER funds will be monitored. The number of districts monitored will not exceed 20% of the school districts who accepted funds.

If not all grant funds are awarded by NJDOE under the Learning Acceleration Program, there may be a second round and this Engagement may be amended at that time.

Below table outlines the expectations of the Integrity Monitor for each area being monitored.

NJDOE Review	Learning Acceleration Review
▪ Review NJDOE policies and procedures, organizational structure/capacity, and internal controls ▪ Conduct a risk assessment of NJDOE policies and procedures, identify risks, and offer recommendations. ▪ Review procedures for verifying duplication of benefits ▪ Interview NJDOE employees or other stakeholders, as necessary	▪ Select a sample of school districts to monitor and review. ▪ Conduct a risk assessment for each selected school districts, identify risks, and offer recommendations. ▪ Review sample of school district applicant files for eligibility, costs, and proper documentation of payments made to vendors. ▪ Review school district compliance with the Learning Acceleration Program requirements. ▪ Sampling methodology may be adjusted during the Engagement to take into account prior findings or indicia of fraud to minimize fraud, waste, or abuse ▪ Interview school district contacts or other stakeholders, as necessary ▪ Review payroll expenditures time sheets, job descriptions, and fringe benefits to ensure proper documentation, eligibility for reimbursement, etc.

- Within 5 business days of the purchase order issued as a result of the Letter of Engagement, the IM and NJDOE shall participate in a kick-off meeting to review the deliverables and due dates in Section C below and establish key personnel for communications during the course of the Engagement.
- The IM shall conduct a Risk Assessment of the NJDOE's existing controls in place to prevent fraud, waste, or abuse in connection with the COVID-19 Recovery Program that includes, at minimum, a review or assessment of:
 - Program policies and procedures
 - NJDOE's organizational structure and capacity
 - NJDOE's internal controls
 - Level of risk associated with the Program
 - NJDOE's prior audits
- The IM shall conduct a Risk Assessment of the existing controls in place in the selected sample school districts to prevent fraud, waste, or abuse in connection with the COVID-19 Recovery Program that includes, at minimum, a review or assessment of:
 - Program policies and procedures
 - School district's organizational structure and capacity
 - School District's internal controls
 - Level of risk associated with the Program
 - School District's prior audits

- Based on the risk assessment, the IM shall develop and submit a Work Plan for monitoring the COVID-19 Recovery Program for fraud, waste, or abuse that includes a review of relevant risk factors specific to the Program being monitored.
- The Work Plan shall include a sampling methodology to achieve a monitoring objective related to both compliance and internal controls. Any sampling used shall follow a nationally recognized audit standard such as the AICPA or GAO Government Auditing Standards, 2018 Revision. Sampling methodologies may include: (1) simple random; (2) statistical; (3) judgmental; (4) or other methodology appropriate to the Program characteristics. The IM shall document the rationale for the sampling methodology selected.
- Depending on findings as a result of monitoring under the Work Plan, the IM should evaluate whether onsite monitoring is appropriate based upon any conclusions reached when conducting the risk assessment or as a result of ongoing monitoring. The IM shall document in writing its evaluation and conclusion, including an assessment of the following factors:
 - Significant findings reported in quarterly reports or interim reports;
 - Unresponsiveness to requests for information;
 - Non-compliance with federal reporting requirements; and
 - Allegations of misuse of funds.
- The IM shall implement the Work Plan to provide oversight of the Program until the expiration of this Engagement.

B. Reporting Requirements

1. Quarterly Integrity Monitor Reports

- a. Pursuant to E.O. 166, the Integrity Monitor shall submit a draft quarterly report to NJDOE on the last day of every calendar quarter detailing the specific services rendered during the quarter and any findings of fraud, waste, or abuse using the Quarterly Report template attached hereto. If the Integrity Monitor report contains findings of fraud, waste, or abuse, NJDOE has an opportunity to respond within 10 business days after receipt.
- b. Fifteen business days after each quarter end, the Integrity Monitor shall deliver its final quarterly report, including any comments from NJDOE, 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 IM Guidelines, OSC may request that the Integrity Monitor issue additional reports or prepare memoranda that will assist OSC in evaluating whether there is fraud, waste, 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.

b. Reporting

- On a monthly basis, the IM shall provide a written report including, at a minimum:
 - Hours billed for each consultant corresponding to the components of the Work Plan;
 - Evaluation of effectiveness of fraud prevention activities including assessment of results, recommendations for corrective action, and prioritization of implementation of risk mitigation measures; and
 - Indications of fraud, waste, or abuse that should be immediately addressed by the NJDOE with recommendations for risk mitigation.
- At the completion of the Engagement, the IM shall submit a Project Completion Report, including at a minimum, scope of Engagement and methodology, documentation of work performed, summary of findings, and recommendations to mitigate the risk of fraud, waste, and abuse in the Program or future Programs.

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

- a. The Integrity Monitor shall report issues of fraud, waste, 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.

C. Specific Performance Milestones/Timelines/Standards/Deliverables

All deliverables must be completed by the dates indicated below.

Deliverables	Date due
Kick-off meeting with Using Agency staff and successful IM	Within 5 days of PO being provided to IM
Risk Assessment of NJDOE	Within 90 days of Engagement Date
Risk Assessment of School Districts	Within 110 days of Engagement Date
Work Plan	Within 120 days of Engagement Date
Interim Reports/Periodic Meetings	Biweekly after kick off meeting
Draft Quarterly Report(s)	Last day of each quarter
Final Quarterly Report(s)	15 business days after the end of each quarter
Monthly Report	Last day of each month
Project Completion Report	9/16/2024

III. Proposal Content

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

- A description of how the Integrity Monitor intends to accomplish each component of the scope of work in Section II above, including a timeline for submission of the deliverables required by this Engagement Query.
- A detailed budget identifying staff classifications and hourly rates shall be submitted with the response to this Engagement Query using the price sheet attached. The hourly rates shall not exceed the rates identified in the in the Integrity Monitor's Blanket P.O./Contract as posted in NJSTART. If an Integrity Monitor submits pricing over the Blanket P.O./Contract hourly rates posted in NJSTART, the response shall be rejected as the Integrity Monitor shall not be eligible for an award of this Engagement Query only.
- Identification of any potential conflicts of interest regarding the delivery of services for the scope of work under this Engagement Query.

B. The Integrity Monitor's proposal should also include the following:

- A list of existing Engagements under G4018 with other State agencies, along with the commencement and expiration dates of the Engagement. Please provide the information on Attachment 4: G4018 Integrity Monitoring Engagements Form. If the Form is not included with the proposal, NJDOE, in its sole discretion, may request the Form from the Integrity Monitor.

IV. Submission of Proposals

Detailed proposals in response to this Engagement Query shall be submitted electronically by 3:00 p.m. on **November 21, 2023**. Proposals must be submitted via email as set forth below:

TO: [REDACTED]
Mona Cartwright, Fiscal Manager, Department of the Treasury
TreasuryIM@treas.nj.gov

With a copy to the Agency Contract Manager: [REDACTED]

V. Duration of the Engagement

The Engagement will commence upon the issuance of a Letter of Engagement and expire on **September 30, 2024**.

At the option of NJDOE, this Letter of Engagement may be extended. Any extension to this Letter of Engagement, however, may not exceed the Contract Term, and any extensions thereto as set forth 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 IM Guidelines, and this Engagement Query may constitute a breach of contract and may result in termination of the contract by NJDOE or imposition of such other remedy as NJDOE deems appropriate in accordance with Section 9.0 of the IOM RFQ.

VII. Liquidated Damages

At the NJDOE's discretion, liquidated damages may be assessed each time any of the below events occur, due to an act or omission of the IM. NJDOE and the IM agree that it would be extremely difficult to determine actual damages that NJDOE will sustain as the result of the IM's failure to meet its contractual requirements. Any breach by the IM could prevent NJDOE 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 NJDOE's ability to ensure identification and mitigation of risks and may lead to damages suffered by NJDOE and the State as a whole. If the IM fails to meet its contractual obligations, NJDOE may assess liquidated damages against the IM as follows:

Failure to deliver a Risk Assessment within thirty (30) days of the due date in Section II, C	\$100/day
Failure to deliver a quarterly report by established due dates (listed in B Reporting Requirements)	\$100/day

VIII. Questions regarding this Engagement Query

Any questions related to the Engagement Query, such as questions related to the Program or accessibility and format of data, must be submitted electronically by 3:00 p.m. on **October 27, 2023**. They must be submitted via email to [REDACTED] with a copy to the State Contract Manager, [REDACTED] at TreasuryIM@treas.nj.gov.

IX. Selection Process

NJDOE's Contract Manager will review the proposal(s) received and select the Integrity Monitor whose proposal is most advantageous, price and other factors considered including:

- The qualifications and experience of the personnel assigned to this Engagement;
- The experience of the IM in engagements of a similar size and scope; and
- The ability of the IM to complete the scope of work based on the proposed personnel/staff classifications and hours allocated to tasks in its proposal.

The State Contract Manager will then issue a Letter of Engagement with a "not to exceed" clause to the selected proposer.

NJDOE may request a Best and Final Offer from Integrity Monitors that responded to the Engagement Query.

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 – Category 3
- Attachment 3: EQ Price Sheet
- Attachment 4: G4018 Integrity Monitoring Engagements Form
- Attachment 5: Application

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, 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, the Proposer shall be solely responsible for defending its designation.



Integrity Oversight Monitor Guidelines

2021 Update

**STATE OF NEW JERSEY
COVID-19 COMPLIANCE AND
OVERSIGHT TASKFORCE**

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INTRODUCTION

On July 17, 2020, Governor Murphy signed Executive Order 166 (“EO 166”), which, among other things, established the COVID-19 Compliance and Oversight Task Force (the “Taskforce”). The purpose of the Taskforce is to advise State departments, agencies, and independent authorities that receive or administer COVID-19 recovery funds (“Recovery Program Participants”) regarding compliance with federal and State law and how to mitigate the risks of waste, fraud, and abuse. As defined in EO 166, “COVID-19 Recovery Funds” are funds awarded to state and local governments, and non-government sources to support New Jersey’s residents, businesses, non-profit organizations, government agencies, and other entities responding to or recovering from the COVID-19 pandemic.

Pursuant to EO 166, the Taskforce is responsible for issuing guidelines regarding the appointment and responsibilities of COVID-19 Oversight Integrity Monitors (“Integrity Monitors”). Recovery Program Participants may retain and appoint Integrity Monitors to oversee the disbursement of COVID-19 Recovery Funds and the administration of a COVID-19 Recovery Program. They are intended to serve as an important part of the state’s accountability infrastructure while working with Recovery Program Participants in developing measures to prevent, detect, and remediate inefficiency and malfeasance in the expenditure of COVID-19 Recovery Funds. Integrity Monitors may also be used, either proactively or in response to findings by an Integrity Monitor, as subject matter experts or consultants to assist Recovery Program Participants with program administration, grants management, reporting, and compliance, as approved by the Governor’s Disaster Recovery Office (GDRO).

EO 166 requires Recovery Program Participants to identify a central point of contact (an “Accountabil-

ity Officer”) for tracking COVID-19 funds within each agency or authority. The Accountability Officer is responsible for working with and serving as a direct point of contact for the GDRO and the Taskforce. Accountability Officers should also ensure appropriate reviews are performed to assess risks and evaluate whether an Integrity Monitor can assist in reducing or eliminating risk to ensure the public that state and federal funds were used efficiently, fairly, and prudently.

Recovery Program Participants and Integrity Monitors should be focused on the common goal of maximizing the value of COVID-19 Recovery Funding by ensuring that every dollar is spent efficiently and properly. Integrity Monitors can add value to a program by assisting in implementing the fiscal controls necessary to maintain proper documentation, flagging potential issues in real time, maximizing reimbursements, sharing information with and responding to inquiries from the GDRO and Office of State Comptroller (OSC), and reporting to those offices, the Treasurer, the Attorney General, and legislative leadership.

Recovery Program Participants, Accountability Officers, and Integrity Monitors should work together to fulfill the goals of EO 166 and these guidelines. The retention of Integrity Monitors will support monitoring and oversight that will ensure that Recovery Program Participants administer COVID-19 recovery funds in compliance with program, financial, and administrative requirements set forth in the federal-state grant agreement, the State Recovery Program Participant sub-grant agreement, and applicable federal and state laws, regulations, and guidelines. Additionally, these guidelines will assist the State in fulfilling its monitoring responsibilities as set forth in 2 CFR 200 Subpart D. This may involve routine desk reviews and, when appropriate, on-site reviews by an Integrity Monitor. Recovery Program Participants that do not retain an Integrity Monitor will comply with these requirements, in coordination with the GDRO, as addressed in the Compliance Plan adopted by the Taskforce.

ESTABLISHING THE POOL OF INTEGRITY MONITORS

As of the issuance of this version of the Integrity Oversight Monitor Guidelines, a pool of monitors has already been established. The following provisions in this section should be used in the event it is necessary to establish additional pools of Integrity Monitors.¹

In the event it is necessary to establish another pool of Integrity Monitors, the New Jersey Department of the Treasury, Division of Administration (Treasury) will be responsible for designating a department employee to act as the State Contract Manager for purposes of administering the overarching state contract for Integrity Monitoring Services. The State Contract Manager will establish one pool of qualified integrity monitors for engagement by eligible Recovery Program Participants. Treasury will issue a bid solicitation for technical and price quotations from interested qualified firms that can provide the following services:

- Category 1: Program and Process Management Auditing;
- Category 2: Financial Auditing and Grant Management; and
- Category 3: Integrity Monitoring/Anti-Fraud.

The specific services Integrity Monitors provide vary and will depend on the nature of the programs administered by the Recovery Program Participant and the amount of COVID-19 Recovery Funding received. The pool of Integrity Monitors should include professionals available to perform services in one or more of the following categories:

Category 1: Program and Process Management Auditing	Category 2: Financial Auditing and Grant Management	Category 3: Integrity Monitoring / Anti-Fraud
Development of processes, controls and technologies to support the execution of programs funded with COVID-19 Recovery Funds.	Plan, implement, administer, coordinate, monitor and evaluate the specific activities of all assigned financial and administrative functions. Develop and modify policies/procedures/systems in accordance with organizational needs and objectives, as well as applicable government regulations.	Forensic accounting and other specialty accounting services.

1. Agencies and authorities that are not permitted to follow all state procurement requirements due to U.S. Department of Transportation procurement policies may procure an Integrity Monitor separately in coordination with GDRO.

Review and improvement of procedures addressing financial management.	Provide technical knowledge and expertise to review and make recommendations to streamline grant management and fiscal management processes to ensure accountability of funds and compliance with program regulations.	Continuing risk assessments and loss prevention strategies.
Workload analysis; skills gap analysis, organizational effectiveness and workforce recruiting strategies.	Monitoring all grant management, accounting, budget management, and other business office functions regularly.	Performance and program monitoring and promotion of best practices.
Consulting services to support account reconciliations.	Provide and/or identify training for staff in the area of detection and prevention of waste, fraud, and abuse.	Prevention, detection and investigation of fraud and misconduct.
Quality assurance reviews and assessments associated with the payments process to ensure compliance with federal and state regulations.	Ensuring compliance with all applicable federal and state accounting and financial reporting requirements.	Implement and manage appropriate compliance systems and controls, as required by federal and state guidelines, regulations and law.
Risk analysis and identification of options for risk management for the federal and state grant payment process.	Provide tools to be used by the Recovery Program Participant for the assessment of the performance of the financial transaction process.	Provide data management systems/programs for the purpose of collecting, conducting and reporting required compliance and anti-fraud analytics.
Consulting services to reduce the reconciliation backlog for the Request for Reimbursements process.		Ability to provide integrity monitoring services for professional specialties such as engineering and structural integrity services, etc. either directly or through a subcontractor relationship.
Consulting services providing Subject Matter Expert (SME) knowledge of required standards for related monitoring and financial standards for federal funding.		

CONDITIONS FOR INTEGRITY MONITORS

A Recovery Program Participant should evaluate whether it should retain an Integrity Monitor using the following standards.

Category 1 & 2 Integrity Monitors:

Category 1 and 2 Integrity Monitors are available to assist Recovery Program Participants, if, in consultation with GDRO, it has been determined that an agency or authority needs assistance in the establishment, administration, or monitoring of a program or when a Category 3 Integrity Monitor has issued findings that require the agency or authority to take corrective actions. In making the determination whether to obtain a Category 1 or 2 Integrity Monitor, a Recovery Program Participant's Accountability Officer, in consultation with GDRO, should evaluate whether an Integrity Monitor from Category 1 or 2 is necessary based on operational needs or to reduce or eliminate risk in view of the agency's or authority's existing resources, staffing, expertise or capacity. Agencies and authorities should evaluate whether the retention of a Category 1 or 2 Integrity Monitor would assist in addressing findings made by Category 3 Integrity Monitors. The availability of federal funds should be considered in evaluating whether to retain an Integrity Monitor from Category 1 or 2. In an appropriate circumstance, a Recovery Program Participant may request or may be directed by the GDRO to retain a Category 1 or 2 Integrity Monitor using non-federal funds.

Category 3 Integrity Monitors:

For Recovery Program Participants that have received or will administer a total of \$20 million or more in COVID-19 Recovery Funds: A Recovery Program Participant that has received this amount of funding should retain at least one Integrity

Monitor from Category 3: Integrity Monitoring/Anti-Fraud, subject to federal funding being available. The retention of Category 1 and 2 Integrity Monitors does not eliminate the obligation to retain a Category 3 Integrity Monitor. In some circumstances, multiple Category 3 Integrity Monitors may be necessary if one monitor is not adequate to oversee multiple programs being implemented by Recovery Program Participant as determined in consultation with the GDRO. In an appropriate circumstance, a Recovery Program Participant may request or may be directed by the GDRO to retain an Integrity Monitor using non-federal funds.

For Recovery Program Participants that have received or will administer a total of up to \$20 million in COVID-19 Recovery Funds: A Recovery Program Participant that has received this amount of funding should evaluate in consultation with GDRO whether a Category 3 Integrity Monitor is needed based on the risks presented. The Recovery Program Participant's Accountability Officer should conduct a risk assessment taking into account both the likelihood and severity of risk in the participant's program(s) and consult with the GDRO regarding whether an Integrity Monitor from Category 3 is necessary to reduce or eliminate risk in view of the agency's or authority's existing resources, staffing, expertise or capacity. The availability of federal funds should be considered in evaluating whether to retain an Integrity Monitor. In an appropriate circumstance, a Recovery Program Participant may request or may be directed by the GDRO to retain an Integrity Monitor from Category 3 using non-federal funds.

RISK ASSESSMENT

As noted above, in certain circumstances, Recovery Program Participants seeking to retain an Integrity Monitor will be advised to conduct a risk assessment to determine the need for such services. A Recovery Program Participant's Accountability Officer, in consultation with the GDRO, should assess the risk to public funds, the availability of federal funds to pay for the Integrity Monitor, the entity's current operations, and whether internal controls alone are adequate to mitigate or eliminate risk.

An Accountability Officer, or an Integrity Monitor retained by a Recovery Program Participant, should conduct an initial review of the Recovery Program Participant's programs, procedures and processes, and assess the organizational risk and the entity's risk tolerance. 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.

An Accountability Officer conducting a risk assessment should complete and memorialize the assessment using the [matrix template you can download from OSC's website](#). The risk assessment should be shared with the GDRO and OSC. Some of the specific factors an Accountability Officer should consider when assessing risk include:

- 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).

The Accountability Officer should determine the organization's risk tolerance as to all recovery programs jointly and as to individual programs, recognizing that Integrity Monitors may be appropriate for some programs and not others within an agency or authority. If the risk exceeds an acceptable level of risk tolerance, the Accountability Officer should engage an Integrity Monitor.

An important element in the risk assessments is documentation of the process and results. This is critical to ensuring the extent of monitoring and oversight. The overall level of risk should dictate the frequency and depth of monitoring practices, including how to mitigate identified risks by, for example, providing training and technical assistance or increasing the frequency of on-site reviews. In some cases, monitoring efforts may lead an Accountability Officer or the GDRO to impose additional special conditions on the Recovery Program Participant. Depending on the kind of work the sub-recipient performs, it may be appropriate to reevaluate frequently, including quarterly, to account for changes in the organization or the nature of its activities. See 2 CFR Section 200.207 in the uniform guidance for examples; [GAO Report: A Framework for Managing Fraud Risk in Federal Programs \(2015\)](#).

PROCEDURES FOR REQUESTING AND PROCURING AN INTEGRITY MONITOR

To retain an Integrity Monitor, a Recovery Program Participant should proceed as follows:

- A Recovery Program Participant shall designate an agency employee to act as the contract manager for an Integrity Monitor engagement (Agency Contract Manager), which may be the Accountability Officer. The Agency Contract Manager should notify the State Contract Manager, on a form prescribed by Treasury, along with any required supporting documentation, of its request for an Integrity Monitor. The Agency Contract Manager should indicate which Integrity Monitoring services are required.
- The Agency Contract Manager will develop an Engagement Query.
- The Engagement Query will include a detailed scope of work; it should include specific performance milestones, timelines, and standards and deliverables.
- The Agency Contract Manager, in consultation with the Office of the Attorney General, Division of Law, will structure a liquidated damages provision for the failure to meet any required milestones, timelines, or standards or deliverables, as appropriate.
- The Agency Contract Manager will submit its Engagement Query to the State Contract Manager. Upon approval by the State Contract Manager, but prior to the solicitation of any services, the Engagement Query shall be sent to OSC for approval pursuant to EO 166. After receiving approval from OSC, the State Contract Manager will send the Engagement Query to all eligible Integrity Monitors within the pool in order to provide a level playing field.
- Interested, eligible Integrity Monitors will respond to the Engagement Query within the timeframe designated by the State Contract Manager, with a detailed proposal that includes a detailed budget, timelines, and plan to perform the scope of work and other requirements of the Engagement Query. Integrity Monitors shall also identify any potential conflicts of interest.
- The State Contract Manager will forward to the Agency Contract Manager all proposals received in response to the Engagement Query. The Agency Contract Manager will review the proposals and select the Integrity Monitor whose proposal represents the best value, price and other factors considered. The Agency Contract Manager will memorialize in writing the justification for selecting an Integrity Monitor(s).
- Prior to finalizing any engagement under this contract, the Agency Contract Manager, in consultation with the Accountability Officer, will independently determine whether the intended Integrity Monitor has any potential conflicts with the engagement.
- The State Contract Manager, on behalf of the Recovery Program Participant, will then issue a Letter of Engagement with a “Not to Exceed” clause to the engaged Integrity Monitor and work with the Agency Contract Manager to begin the issuance of Task Orders.

INTEGRITY MONITOR REQUIREMENTS

A. Independence

The process by which Integrity Monitors are retained and the manner in which they perform their tasks in accordance with these guidelines are intended to provide independence as they monitor and report on the disbursement of COVID-19 Recovery Funds and the administration of a COVID-19 Recovery Program by a Recovery Program Participant. Although the Integrity Monitor and the Recovery Program Participant should share common goals, the Integrity Monitor should function as an independent party and should conduct its review as an outside auditor/reviewer would.

An Integrity Monitor for a particular Recovery Program Participant should have no individual or company affiliation with the agency or authority that would prevent it from performing its oversight as an independent third party. Integrity Monitors and Recovery Program Participants must be mindful of applicable conflicts of interest laws, including but not limited to, N.J.S.A. 52:13D-12 to -28, Executive Order 189 (Kean, 1988) and requirements set forth in the Uniform Grant Guidance, among others. To promote independence, an Integrity Monitor hired from Categories 1 or 2 may not also be engaged as a Category 3 Integrity Monitor to review the same programs for the same Recovery Program Participant. Likewise, a Category 3 Integrity may not be hired as a Category 1 or 2 Monitor to remediate any issues it identified as a Category 3 Integrity Monitor.

B. Communication

Integrity Monitors should maintain open and frequent communication with the Recovery Program Participant that has retained its services. The purpose of communicating in this manner is to make the Recovery Program Participant aware of issues that can be addressed during the administration of a program and prior to future disbursement of funds by the Parti-

cipant. Therefore, Integrity Monitors should not wait until reports are issued to notify an Accountability Officer of deficiencies. This will enable the Recovery Program Participant to take action to correct any deficiencies before additional funds are expended. Substantial deficiencies should also be reported in real time to the GDRO, the State Comptroller, and the State Treasurer.

Prior to the posting of an Integrity Monitor report that contains findings of waste, fraud, or abuse, the Recovery Program Participant should be permitted to respond to the findings and have that response included in the publicly posted report. This will allow the Recovery Program Participant to highlight any course corrections as a result of the finding or to contest any finding that it feels is inappropriate. A Recovery Program Participant's response is due within 15 business days after receipt of an Integrity Monitor report.

Integrity Monitors must respond promptly to any inquiries posed by the GDRO, State Comptroller, State Treasurer, and Agency Contract Manager pursuant to EO 166.

C. General Tasks of Integrity Monitors

The tasks of an Integrity Monitor may vary based on the agency/program the Monitor is overseeing and the category of Integrity Monitor engaged. Generally, the role of a Category 1 Integrity Monitor is focused on program and process management auditing. These Integrity Monitors may assist a Recovery Program Participant in developing processes or controls to support the execution of programs, conduct risk analyses, or provide consulting or subject matter expertise to Recovery Program Participants. In general, a Category 2 Integrity Monitor's role is to provide financial auditing or grants management functions for a Recovery Program Participant. A Category 3 Integrity Monitor's primary roles are to monitor for fraud or misuse of funding, and ensure that Recovery Program Participants are performing according to the sub-award agreement and applicable federal and State regulations and guidelines. Tasks to be performed by Integrity

Monitors may include the following:

- Perform initial and ongoing risk assessments;
- Evaluate project performance;
- Evaluate internal controls associated with the Recovery Program Participant's financial management, cash management, acquisition management, property management, and records management capabilities;
- Validate compliance with sub-grant award and general term and special conditions;
- Review written documents, such as quarterly financial and performance reports, recent audit results, documented communications with the State, prior monitoring reports, pertinent performance data, and other documents or reports, as appropriate;
- Conduct interviews of Recovery Program Participant staff, as well as the constituents they serve, to determine whether program objectives are being met in an efficient, effective, and economical manner;
- Sample eligibility determinations and denials of applications for funding;
- Review specific files to become familiar with the progression of the disbursement of funds in a particular program, i.e., are actual expenditures consistent with planned expenditure and is the full scope of services listed in the project work plan being accomplished at the same rate of actual and planned expenditures;
- Ensure that the agency is retaining appropriate documentation, based on federal and state regulations and guidance, to support fund disbursement;
- Follow up with questions regarding specific funding decisions, and review decisions related to emergency situations;
- Facilitate the exchange of ideas and promote operational efficiency;
- Identify present and future needs; and
- Promote cooperation and communication among Integrity Monitors engaged by other Recovery Program Participants (e.g., to guard against duplication of benefits).

Integrity Monitors should generally perform desk reviews to evaluate the need for on-site visits or monitoring. Depending on the results of the desk review, coupled with the conclusions reached during any risk assessments that may have been conducted of the sub-recipient's capabilities, the Monitor should evaluate whether an on-site monitoring visit is appropriate. If the Monitor is satisfied that essential project goals, objectives, timelines, budgets, and other related program and financial criteria are being met, then the Monitor should document the steps taken to reach this conclusion and dispense with an on-site monitoring visit. However, the Integrity Monitor may choose to perform on-site monitoring visits as a result of any of the following:

- Non-compliance with reporting requirements;
- Problems identified in quarterly progress or financial reports;
- History of unsatisfactory performance;
- Unresponsiveness to requests for information;
- High-risk designation;
- Follow-up on prior audits or monitoring find-

ings; and

- Allegations of misuse of funds or receipt of complaints.

D. Reporting Requirements

1. Reports

Pursuant to EO 166, Integrity Monitors shall submit draft quarterly reports to the Recovery Program Participant on the last day of the quarter detailing the specific services rendered during that quarter and any findings of waste, fraud, or abuse **in accordance with the report templates [found on OSC's website](#)**.

Prior to the posting of a quarterly report that contains findings of waste, fraud, or abuse, the Recovery Program Participant should be permitted to respond to the findings and have that response included in the publicly posted report. This will allow the Recovery Program Participant to highlight any course corrections as a result of the finding or to contest any finding that it contends is inappropriate. A Recovery Program Participant's response is due within 15 business days after receipt of a quarterly report.

Fifteen business days after quarter-end, Integrity Monitors will deliver their final quarterly reports, inclusive of any comments from the Recovery Program Participant, 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 GDRO transparency website pursuant to the Executive Order.

The specific areas covered by a quarterly report will vary based on the type of Integrity Monitor engaged, the program being reviewed, the manner

and use of the funds, procurement of goods and services, type of disbursements to be issued, and specific COVID-19 Recovery Fund requirements. The topics covered by the quarterly report should include the information included in [templates which you can download from OSC's website](#).

2. Additional Reports

EO 166 directs OSC to oversee the work of Integrity Monitors and to submit inquiries to them to which Integrity Monitors must reply promptly. OSC may request Integrity Monitors to issue reports or prepare memoranda that will assist OSC in evaluating whether there is waste, fraud, or abuse in recovery programs administered by Recovery Plan Participants.

The State Comptroller may also request that Integrity Monitors or Recovery Program Participants share corrective action plans prepared by Recovery Plan Participants to address reported deficiencies and to evaluate whether those corrective plans have been successfully implemented.

GDRO and the State Treasurer may also request reports from Integrity Monitors to which Integrity Monitors must reply promptly.

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

Integrity Monitors must immediately report substantial issues of waste, fraud, abuse, and misuse of COVID-19 Recovery Funds simultaneously to the GDRO, OSC, State Treasurer, and the Agency Contract Manager and Accountability Officer of a Recovery Program Participant.

Integrity Monitors must immediately report potential criminal conduct to the Office of the Attorney General.

INTEGRITY MONITOR MANAGEMENT AND OVERSIGHT

Agency Contract Managers have a duty to ensure that Integrity Monitors perform the necessary work, and do so while remaining on task, and on budget. Agency Contract Managers shall adhere to the requirements of Treasury Circular 14-08-DPP in their management and administration of the contract. The Agency Contract Manager will be responsible for monitoring contract deliverables and performing the contract management tasks identified in the circular, which include but are not limited to:

- Developing a budget and a plan to manage the contract. In developing a budget, the Agency Contract Manager should consider any caps on the amount of federal funding that can be used for oversight and administrative expenses and ensure that the total costs for Integrity Monitoring services are reasonable in relation to the total amount of program funds being administered by the Recovery Program Participant;
- Daily management of the contract, including monitoring and administering the contract for the Recovery Program Participant;
- Communicating with the Integrity Monitor and responding to requests for meetings, information or documents on a timely basis;
- Resolving issues with the Integrity Monitor in accordance with contract terms;
- Ensuring that all tasks, services, products, quality of deliverables and timeliness of services and deliverables are satisfied within contract requirements;

- Reviewing Integrity Monitor billing and ensuring that Integrity Monitors are paid only for services rendered;
- Attempting to recover any and all over-billings from the Integrity Monitor; and
- Coordinating with the State Contract Manager regarding any scope changes, compensation changes, the imposition of liquidated damages, or use of formal dispute processes.

In addition to these oversight and administration functions, the Agency Contract Manager must ensure open communication with the Accountability Officer, the Recovery Program Participant leadership, the GDRO, and OSC. The Agency Contract Manager should respond to inquiries and requests for documents from the GDRO and OSC as requested.



State of New Jersey, COVID-19 Compliance and Oversight Taskforce

**Integrity Monitor Report
Category 3**

Integrity Monitor Firm Name: [Type Here]
Quarter Ending: [MM/DD/YYYY]
Expected Engagement End Date: [MM/DD/YYYY]

A. General Info

1. Recovery Program Participant:

[Type Here]

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

[Type Here]

3. State Funding Source (if applicable):

[Type Here]

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

[Type Here]

5. Accountability Officer:

[Type Here]

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

[Type Here]

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

[Type Here]

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

[Type Here]

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

Integrity Monitor Report
Category 3

[Type Here]

10. Amount Provided to Other State or Local Entities:

[Type Here]

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

[Type Here]

12. Completion Status of Integrity Monitor Engagement:

[Type Here]

B. Monitoring Activities

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

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

14. Description of the services provided to the Recovery Program Participant during the quarter (i.e. activities conducted, such as meetings, document review, staff training, etc.):

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

**Integrity Monitor Report
Category 3**

15. Description to confirm appropriate data/information has been provided by the Recovery Program Participant and description of activities taken to review the project/program:

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

**Integrity Monitor Report
Category 3**

[Type Here]

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

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

C. Miscellaneous

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

a) IM Response

**Integrity Monitor Report
Category 3**

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

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

a) IM Response

[Type Here]

b) Recovery Program Participant Comments

[Type Here]

Name of Integrity Monitor:	[Type Here]
Name of Report Preparer:	[Type Here]
Signature:	[Sign Here]
Date:	[MM/DD/YYYY]

Integrity Monitoring - Price Sheet

Cell to be completed by Bidder

	Staffing Category	Hourly Billing Rate (\$)	Hours	Amount (\$)	Total Cost (\$)	Hourly Discounted Billing Rate (\$)	Amount (\$)	Total Cost (discounted) (\$)
Risk Assessment	Partner/Principal/Director			\$0.00	\$0.00		\$0.00	\$0.00
	Program Manager			\$0.00			\$0.00	
	Project Manager			\$0.00			\$0.00	
	Supervisory/Sr. Consultant			\$0.00			\$0.00	
	Consultant			\$0.00			\$0.00	
	Associate/Staff			\$0.00			\$0.00	
	Subject Matter Expert			\$0.00			\$0.00	
	Administrative Support			\$0.00			\$0.00	
			0					
Work Plan Development	Partner/Principal/Director			\$0.00	\$0.00		\$0.00	\$0.00
	Program Manager			\$0.00			\$0.00	
	Project Manager			\$0.00			\$0.00	
	Supervisory/Sr. Consultant			\$0.00			\$0.00	
	Consultant			\$0.00			\$0.00	
	Associate/Staff			\$0.00			\$0.00	
	Subject Matter Expert			\$0.00			\$0.00	
	Administrative Support			\$0.00			\$0.00	
			0					
On-going Monitoring	Partner/Principal/Director			\$0.00	\$0.00		\$0.00	\$0.00
	Program Manager			\$0.00			\$0.00	
	Project Manager			\$0.00			\$0.00	
	Supervisory/Sr. Consultant			\$0.00			\$0.00	
	Consultant			\$0.00			\$0.00	
	Associate/Staff			\$0.00			\$0.00	
	Subject Matter Expert			\$0.00			\$0.00	
	Administrative Support			\$0.00			\$0.00	
			0					
Reports	Partner/Principal/Director			\$0.00	\$0.00		\$0.00	\$0.00
	Program Manager			\$0.00			\$0.00	
	Project Manager			\$0.00			\$0.00	
	Supervisory/Sr. Consultant			\$0.00			\$0.00	
	Consultant			\$0.00			\$0.00	
	Associate/Staff			\$0.00			\$0.00	
	Subject Matter Expert			\$0.00			\$0.00	
	Administrative Support			\$0.00			\$0.00	
			0					
	Allowance for Travel Expenses and Reimbursement if on-site monitoring required			\$10,000.00				
Total Cost (non-discounted)					\$10,000.00			
Total Cost (if discounted)					\$10,000.00			



New Jersey Learning Acceleration Program: High-Impact Tutoring Grant

24-AB01-H02

Program Term Date: October 11, 2023 to August 31, 2024

Application Due Date: **Wednesday, September 20, 2023**
no later than 4:00 p.m.

Angelica Allen-McMillan, Ed.D
Acting Commissioner of Education

Jorden Schiff, Ed.D
Assistant Commissioner

Lisa Haberl
Executive Director

FY24
SFRF ALN: 21.027
ARP GEER ALN: 84.425V

New Jersey Department of Education
P.O. Box 500 • Trenton, NJ 08625-0500

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Dr. Angelica Allen-McMillan, Acting Commissioner
Secretary, State Board of Education

It is a policy of the New Jersey State Board of Education and the State Department of Education that no person, on the basis of race, color, creed, national origin, age, sex, handicap or marital status, shall be subjected to discrimination in employment or be excluded from or denied benefits of any activity, program or service for which the Department has responsibility. The Department will comply with all state and federal laws and regulations concerning nondiscrimination.

The following are requirements and instructions on the New Jersey Department of Education (NJDOE) Notice of Grant Opportunity (NGO). Instructions on how to gain access to the application and how to complete the application in the Electronic Web-enabled Grant (EWEG) system are available in [the Pre-Award Manual](#).

When responding to this NGO, applicants must use the Electronic Web-Enabled Grant System (EWEG) online application system on the NJDOE's [Homeroom](#) webpage. Please refer to the NJDOE's [Discretionary Grants](#) web page for the NGO and (click on available grants) for information on when the EWEG application will be online. The responsibility for a timely submission resides with the applicant. The Application Control Center (ACC) must receive the completed application through the online EWEG system access through the NJDOE's Homeroom web page on the due date of the application, no later than 4:00 p.m. Without exception, the ACC will not accept, and the Office of Grants Management (OGM) cannot evaluate for funding consideration, an application after this deadline.

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I. Grant Program Information

I.1 Purpose of the NGO

The NJDOE supports local education agencies (LEAs) efforts as they respond to students' increased academic needs and the necessity to accelerate learning by proposing a state-supported tutoring initiative. This has become a priority strategy as high-impact tutoring is an effective, research-based method LEAs can use to optimize learning acceleration. The initiative will provide targeted funding to districts for high dosage, intensive tutoring. This project optimizes funding for targeted tutoring through identified vendors or organizations in addition to schools and districts that meet established, research-based criteria.

The goal of this grant opportunity is to prioritize high-impact tutoring interventions for students that have been disproportionately affected by the pandemic. This opportunity prioritizes districts with elementary schools and their students in grades three (3) and four (4) but will allow LEAs awarded the grant to serve additional students as needed. Applicants may apply for up to \$768,000 in funds based on a tiered system of student enrollment correlated with maximum funding levels (see Figure 1 below). This single-year grant program begins October 11, 2023 and will close on August 31, 2024.

To complement and support this grant opportunity, the NJDOE has curated a list of eligible tutoring providers for reference by LEAs via a Request for Qualifications (RFQ) vendor evaluation process. Eligible applicants for the vendor list include individual organizations and a consortium of multiple organizations working together to deliver a wider range of tutoring services. If a district elects to utilize existing staff members to offer tutoring services and incurs additional costs as a result, they may do so. They may be reimbursed for costs associated with tutoring provided by the LEA, if the tutoring comports with the evidenced-based requirements detailed in this Notice of Grant Opportunity.

NOTE: It is the responsibility of the LEA to contract with the vendor providing tutoring services. All LEAs must follow local policies and procedures for contracting with vendors as well as the Public School Contracts Laws (N.J.S.A. 18A:18A-1, et seq.) and associated regulations found at N.J.A.C. 5:34-1 et seq.

Application Type: Limited Competitive* Open to all operating New Jersey public school districts serving students in grades three (3) and/or grade 4 (four).

Target Audience: ☒ Local Education Agency (LEA),
☐ Community-Based Nonprofit Organization (CBO), or
☐ Institutes of Higher Education (IHE)

I.2 Federal Compliance Requirements - Unique Entity Identifier (UEI) Registrations

In accordance with the Federal Fiscal Accountability Transparency Act (FFATA), all grant recipients must have a valid Unique Entity identifier (UEI). As part of the government-wide initiative, NJDOE will join other Federal agencies and transition from the use of the Dun and Bradstreet Data Universal Numbering System (DUNS) to the new UEI for all grant recipients and applicant organizations. UEIs are the primary means of entity identification for Federal awards and are required in accordance with 2 CFR Part 25. The UEI number is administered by the Federal Government in [SAM.gov](https://sam.gov) (System for Award Management).

I.3 Award Management SAM Application

Prior to applying for a grant application, the Local Education Agency (LEA), Community-Based Nonprofit Organization (CBO), or Institute of Higher Education (IHE) must create a profile in the NJDOE's EWEG AWARD Management SAM application to include the district's UEI information:

Key steps/actions:

1. Create and submit the AWARD Management SAM application in EWEG if your entity has applied for or has received other grants from the NJDOE.
2. When completing the AWARD Management SAM application, entities must enter an active SAM UEI and upload a copy of the district's Entity Overview form.
3. To renew an existing SAM UEI or apply for a SAM UEI, entities must go through www.sam.gov.

Failure to complete or update the AWARD Management SAM application in EWEG will prevent the applicant from viewing, creating, and submitting applications in the EWEG system.

No award will be made to an applicant not in compliance with FFATA.

I.4 Dissemination of This Notice

The Division of Teaching and Learning Services will make this notice available via NJDOE Weekly Broadcast Message from Acting Commissioner Angelica Allen-McMillan, Ed.D. to eligible applicants listed in [Section I.1](#), the Executive County Superintendents of each county.

Additional copies of the NGO are also available on the NJDOE's [Discretionary Grant](#) website or by contacting the Division of Teaching and Learning Services at the New Jersey Department of Education, 100 Riverview Plaza, Route 29, P.O. Box 500, Trenton, NJ 08625-0500; telephone: (609) 376-3885; email: njtutor@doe.nj.gov.

I.5 Access to the EWEG Application

Each eligible applicant must have a login ID and password to access the system. LEA applicants should contact their district's Web (Homeroom) Administrator, who will complete the registration. Non-LEA applicants should send an email request for [EWEG Help](#). Please allow 24-48 hours for the registration to be completed.

The NJDOE advises applicants to plan appropriately to allow time to address any technical challenges that may occur. Additionally, applicants should run a consistency check at least 48 hours before the due date to determine any errors that might prevent the submission of the application. Applicants are advised not to wait until the due date to submit the application online as the EWEG system may be slower than normal due to increased usage. Running the consistency check does not submit the application. When the consistency check runs successfully, a submit button will appear. Once the application is complete and has passed a clean consistency check with no error messages, the applicant may submit the application by clicking the Submit button and wait for the EWEG system message indicating the application was submitted. The application status will update in the GMS Select page to "Submitted for Review" along with the date the application was submitted.

Important: Once the application has been submitted via EWEG, the application will not be returned to the applicant for editing, nor can additional information or missing documentation be submitted to the department for application review consideration. **Please Note: The submit button in the EWEG system will disappear as of 4:00 PM on the due date.** Please refer to the [Pre-Award Manual](#) for instructions on how to work in EWEG.

I.6 Application Submission

The ACC must receive the completed application through the online EWEG system access through the NJDOE [Homeroom](#) web page **no later than 4:00 p.m. on Wednesday, September 20, 2023**. Without exception, the ACC will not accept, and the OGM cannot evaluate for funding consideration, an application after this deadline.

The NJDOE administers discretionary grant programs in strict conformance with procedures designed to ensure accountability and integrity in the use of public funds and, therefore, will not accept late applications. The responsibility for a timely submission resides with the applicant.

Completed applications are those that include all elements listed in [Section II.5.](#), Application Component Required Uploads checklist. Applications received by the due date and specified time will be screened to determine whether they are, in fact, eligible for consideration. NJDOE reserves the right to reject any application not in conformance with the requirements of this NGO. **Paper copies of the grant application will not be accepted in lieu of the EWEG application. Applications submitted via FAX will not be accepted under any circumstances.**

I.7 Application Review Criteria

To be considered for funding, all grant applications complete a two-tiered review. The application will be reviewed and scored by evaluators and the Program Office responsible for administering the program. The evaluators will use the information provided in the grant application under the Narrative Tabs which include the Need, Project Description, Project Activity Plan, Goals/Objectives – Indicators and Activity Plan, Commitment and Capacity, the Budget Tabs, and all required documentation noted as part of the NGO in the Upload Tab. In addition to how well the content addresses [Section II.4.](#), the evaluators will also review the NGO application for completeness and accuracy. The total point value for the NGO is 100 points.

Grant applications must score 70 points or greater and meet the intent of the Notice of Grant Opportunity (NGO) before the addition of any bonus points, as noted in section 1.1 Eligibility to Apply in the NGO, and Section II.4., Project Design Components. The NJDOE reserves the right to reject any application, not in conformance with the requirements of this NGO.

I.8 Grantee Award Notifications

A successful applicant will be notified via the EWEG system to the emails listed in the Contacts Tab and a list will be posted on the NGO web page within the NJDOE website. Preliminary Approved Applications will be notified via EWEG with instructions on how to proceed with Pre-award Revisions (PAR). Instructions on how to initiate the PAR process by creating an amendment, refer to the [Pre-Award Manual](#).

Those applicants not meeting the 70-point threshold, and/or the intent of the NGO listed in [Section II.4.](#), Program Design Consideration, will be notified via an EWEG email to the contacts listed in the application and the application status will read “No Award.”

I.9 Open Public Records

Please be advised that in accordance with the Open Public Records Act P.L. 2001, c. 404, all applications for discretionary grant funds received September 1, 2003, or later, as well as the evaluation results associated with these applications, and other information regarding the competitive grants process, will become matters of public record upon the completion of the evaluation process and will be available to members of the public upon request.

II. Completing the Application

This section intends to provide the applicant with the framework within which it will plan, design, and develop its proposed project to meet the purpose of this NGO. Before preparing applications, potential applicants are advised to review [Section I.](#), Grant Program Information, to ensure a complete understanding of the State's vision and purpose for offering the program. Additionally, the information in [Section III.](#), Grant Agreement and Program Requirements, will provide the applicant with an understanding of the specific considerations and requirements to be considered and/or addressed in their project.

II.1. General Instructions for Applying

Applicants must prepare and submit a complete application by the deadline to apply for a grant under this NGO. The following components in their related EWEG Tabs in the application are required to be completed:

Admin Tab – Contacts, Allocation, Assurance, Board Resolution,

Narrative Tab – Abstract, Project Description, Need, Goals & Objectives, Project Activity Plan, Organizational Commitment & Capacity

Budget Tab – All related subtabs.

Upload Tab – The required documents to be included in the application as stated in the NGO.

The application must respond to the State's vision as articulated in [Section I.](#), Grant Program Information. It must be planned, designed, and developed in accordance with the program framework articulated in [Section II.](#), Completing the Application. The applicant may seek additional guidance in the [Pre-Award Manual for Discretionary Grants](#).

II.2. Application Technical Assistance Sessions

Friday, August 11, 2023

Monday, August 14, 2023

☒ **TEAMs Virtual Meetings:** Please register for **only one** of the available sessions [here](#).

II.3. Grant Deliverables

Expected outcomes should align with the intent of the NGO, as noted in [Section I.1.](#), Purpose of the NGO, and [Section II.4.](#), Project Design Considerations. Grant recipients are required to adhere to the reporting schedule detailed in [Section III.](#), Grant Agreement and Program Requirements. Outcomes related to the New Jersey Learning Acceleration Program: High-Impact Tutoring Grant that can be measured through improvements in student performance are among the expected outcomes for this grant program. The Program Office welcomes invitations from grantees to observe and discuss the impact and outcomes of this grant funding via in-person and/or virtual site visits.

II.4. Project Design Considerations

High-impact tutoring has been leveraged as an effective strategy in support of learning acceleration. It has been shown to lead to substantial learning gains for students, provided the program is implemented with fidelity, according to research-based best practices. Tutoring programs should be structured to suit student and community needs while leveraging district-specific tools and resources for building, expanding, improving and funding such programs. When tutoring programs do not have these features, they may lead to negligible improvements in student learning.

II.4.a. Program Quality Criteria

The NJDOE and this grant opportunity are prioritizing tutoring programs in service to learning acceleration that meet research-based best practices and are designing with consideration of the following criteria:

- **Staffing:** Programs led by appropriately qualified teachers or paraprofessionals with pedagogical content knowledge are generally more effective than those that use nonprofessional/volunteer or parent tutors. However, it is important to note that adequate training and ongoing support are essential for all tutoring programs to be effective, irrespective of the tutor's background.
- **Curriculum:** Programs based on high-quality instructional materials (inclusive of formative assessments) tightly aligned with the adopted curriculum reinforce and supports classroom instruction. Tutors and teachers can have more focused conversations if tutoring and classroom curricula and assessments are tightly aligned.
- **Data:** Programs that use diagnostic assessments to tailor instruction for individual students (or small groups) are most effective. Regular use of data and ongoing assessments throughout the program lead to a more precise intervention and stronger outcomes.
- **Frequency:** Programs that are delivered in high dosage (three or more sessions per week) or intensive, week-long sessions yield the best outcomes. Lower frequency/dosage and less intense interventions do not yield the same positive effects on student growth.
- **Schedule:** Programs conducted during the school day tend to result in greater learning gains than those held after school or during the summer. Targeted support received closer to the time of aligned instruction is most beneficial for students.
- **Size:** Programs are most effective when serving only a few students at a time. While a one-to-one ratio is optimal, tutors may be able to effectively serve up to three or four students at once. Beyond four students, instruction becomes less personalized, requiring higher tutor skills to maintain efficacy.
- **Consistency:** Programs that ensure students have a consistent tutor over time allow for positive tutor-student relationships to develop and will lead to tutors being most responsive to the student's specific needs. In addition, informed matching of tutors to students can help tutors adopt specific strategies that best serve students from diverse backgrounds and students with specific learning needs.
- **Delivery:** Programs that are delivered in person have demonstrated positive academic outcomes. There is emerging evidence to suggest that remote tutoring may have similar outcomes, but the body of research is not well developed yet.

The above criteria will be used to evaluate proposals to ensure the programs are designed to support high-quality tutoring for students.

II.4.b. Project Requirements

The following point values apply to the evaluation of applications received in response to this NGO:

Project Abstract (250-300 words) – The Project Abstract is a (250- 300 word) summary of the proposed project's need, purpose, and projected outcomes. The proposed project and outcomes must cover the full grant period. Do not include information in the abstract that is not supported elsewhere in the application.

Statement of Need [20] – The Statement of Need identifies the local conditions and/or needs that justify the project proposed in the application. A "need" in this context is defined as the difference between the current status and the outcomes and/or standard(s) that the LEA would like to achieve.

- Describe the target population to be served in the proposed tutoring program. This should include the following, at a minimum:
 - Identify grade levels of the children to be served, with a *priority* focus on grades three (3) and four (4) within English Language Arts and Mathematics content areas;
 - Identify how students were selected for participation in the program; indicate which academic subject(s) will be the focus of the program and include a detailed explanation of why that subject(s) was selected; and
 - Describe the target population's current academic achievement as compared to state and local trends.
- Identify the LEAs and student population's needs that your grant project intends to meet through this grant opportunity.
 - Identify the reason for seeking funding. Discuss the needs of the student population and identify the learning needs that will be met relative to the grant's goals;
 - Identify the needs and current staffing and scheduling capacity to support the program and identify how your program will be implemented (partnering with a provider (see approved provider/vendor partner list), creating your program or a hybrid model) as a result of this grant.
- *Provide documentation* to substantiate the stated conditions and/or needs. Documentation may include but is not limited to demographics, assessment data, descriptions of the target population(s), nonidentifying student data, personnel data, and research. Include as much relevant data as available.
- Do not attempt to address problems beyond the grant program's scope.

Project Description [30] – Describe the project design and plan for implementing the project within the grant period in a detailed narrative. Assure that the strategies or activities are of sufficient quality and scope to ensure equitable access and participation among all eligible program participants. Provide evidence that the project is appropriate for and will successfully address the identified needs of the students within schools and/or districts. Describe the effect the project will have on the identified student population upon completion and how project impact will be evaluated. Explain how the proposed model, strategy, or approach is based on some or all of the criteria described in Section II.4a. Describe how the elements of a high-impact tutoring program will be addressed, with a specific focus on the criteria described in Section II.4. At a minimum, the project description should address the following four elements:

- A. **Tutor:** How will the grantee ensure all tutors are qualified, engaging, reliable, and consistent? Describe the initial and ongoing training that includes equity and safety. Describe the ongoing oversight and coaching tutors will receive.
- Provide evidence of tutor expectations, content proficiency, effective facilitation, data practices, and supporting students with learning differences (i.e., preservice training, related credentials, etc.)
 - If applicable, describe how the grantee will ensure that the selected vendor meets the abovementioned expectations. If available, cite specific requirements, considerations, structures, and/or contractual evidence that will be included or reviewed by the grantee to ensure the above expectations are met.
 - Provide evidence that the grantee has addressed responsibility for maintaining the health, safety, and welfare while the students are under its control and supervision. The grantee must describe how students will be properly supervised, consistent with local policies and regulations, to ensure student safety while students receive tutoring services.
- B. **Learning Integration:** Describe when tutoring will take place. How will the tutor(s) engage with teachers and families, if applicable? *Priority* will be given to those where tutoring is embedded within the school day.
- Include how the program will be scheduled and how the grantee plans to provide tutoring service while maintaining students' consistent access to non-core/core academic instruction.
 - The NJDOE has developed guidance in support of this element for grantees' reference. The [Maximizing Schedules to Support Learning Acceleration](#) resource can be used to guide this portion of the grantee's application response.
- C. **Program Elements:** Describe the program's structure and identify how you intend to *implement* high-impact tutoring.
- Quantify the number of students that will be served.
 - Identify the specific high-quality instructional materials to be used throughout the program and provide a justification for their use.
 - Describe the number of sessions and minutes per week for the targeted population. *Priority* will be given to those who can provide no less than three (3) or more times a week for thirty (30) to sixty (60) minutes per session.
 - Describe the structure of the student tutoring sessions. *Priority* will go to those structuring tutoring sessions to three (3) or fewer students per tutor at a time.
 - Describe how student attendance will be monitored.
 - Explain how responsibility for maintaining students' health, safety, and welfare has been addressed during tutoring sessions. Describe how students will be properly supervised, consistent with local policies and regulations, to ensure student safety while students receive tutoring services.
- D. **Data Use:** Describe the project's process for conducting routine assessments and ways the results will be used to provide individualized instruction. Include an explanation of how state assessment data will be used to describe the impact of the tutoring program.
- How will student assessment results be shared with staff? Describe the mechanisms for regular communication with content area teachers.
 - Describe the measurement system that will be used to track the program's progress towards goals(s). How will progress be shared with key stakeholders?

- Include benchmarks for the program's early, middle and final stages and how progress will be measured towards these benchmarks.
- How will the grantee measure project impact or define evidence of success? How will the program be evaluated based on increases in student performance?
- The project requires a comparative analysis of student performance on state level assessments before and after the tutoring program is implemented. Describe how the analysis will be conducted and how the tutoring program's impact will be measured through state assessment results.

Goals/Objectives/Indicators [20] – Establish one or more local goal(s) for this program. Using the goal(s), create objectives that are (1) relevant to the selected goal, (2) applicable to grant-funded activities, (3) clearly written, and (4) measurable. Objectives should clearly illustrate the plan to achieve the goal(s). They must be achievable and realistic while identifying the *"who, what, and when"* of the proposed project. Objectives must be results-oriented and clearly identify what the project is intended to accomplish. The objectives must contain quantitative information, benchmark(s), and how progress will be measured. Objectives should also link directly to the individual stated needs and provide a time frame for completion.

Applications must also include a plan to evaluate the project's success in achieving its goal and objectives. Indicators of success must be established for each project objective. In constructing the indicators, describe the methods that will be used to evaluate the progress toward achievement of the goal and objectives, as well as the overall grant project outcomes. Also, describe in the indicators the measures and instruments to be used, the individuals responsible for developing and conducting the evaluation, and how results will be used to improve project outcomes. Well-constructed indicators of success will help establish a clear understanding of responsibilities and a system of accountability for the project. They will also help to determine whether or not to refine an aspect of the project to ensure overall success during the grant implementation period.

- Review the Statement of Need before and after constructing the objectives to ensure that the objectives clearly address identified needs.
- Identify the project's anticipated outcomes in measurable terms and in relation to the stated needs.
- Define the population to be served.
- Identify the specific measuring/assessment tools and expected performance levels to indicate the successful achievement of the objective, specifically with regard to student performance on state level assessments.

Make certain to construct measurable indicators of success that directly link to and support project objectives.

Commitment and Capacity [10] – After identifying the conditions and/or needs and the plan to address them, next describe the tutoring organization selected (or local instructional staff members, if not selecting from the vendor list) and the capacity to take on the project. Describe the LEA/school's commitment to addressing the conditions and/or needs identified, including the organizational support that exists for implementing the proposed project. Describe all organizational resources (staff, facilities, equipment, funds, etc.) that will support successful project implementation.

- Identify the current programs and initiatives that already exist within your LEA to address the targeted population's needs.

- Identify opportunities to complement and/or improve existing programs and initiatives and the changes your grant project intends to accomplish as a result of this grant program; and
- Identify existing partnerships with approved tutoring providers and describe how they will contribute to the success of your program, if applicable.
- **Priority consideration will be given to applicants that can demonstrate that the applicant either anticipates, through participation in this program, or has already obligated or expended American Rescue Plan Elementary and Secondary Schools Emergency Relief (ARP ESSER) funding in service of learning acceleration beyond the twenty percent minimum allocation for addressing learning loss.**

Project Activity Plan [10] - The Activity Plan is for the current grant period and follows the goal(s) and objectives that were listed in the previous section. Activities represent the steps that it will take to achieve each identified objective. Also, the activities identified in this section serve as the basis for the individual expenditures being proposed in the budget. Review the Goal(s) and the Objectives when constructing the Project Activity Plan to ensure that appropriate links have been established between the goal(s) and objectives and the activities.

- State the relevant objective in full in the space provided. Number the Goal 1 and each objective 1.1, 1.2, 1.3, etc.
- Describe all the tasks and activities planned to accomplish each goal and objective.
- List all the activities in chronological order.
- Space the activities appropriately across all report periods of the grant project.
- Identify the staff directly responsible for the implementation of the activity. If the individual conducting the activity is not referenced appropriately on the Project Activity Plan, it may not be possible to determine an allocation of the requested cost, and costs may be disallowed.
- List the documentation that tracks the progress and confirms the completion of each activity, such as agenda, minutes, curriculum, etc.
- In the Report Period Column on the Project Activity Plan, indicate with a checkmark the period in which the activity will be implemented. If the activity is ongoing or recurring, place a checkmark in the boxes under each period in which the activity will take place.

Do not list the project director or other person with general oversight authority as the "person responsible" for carrying out all activities. Each activity or set of activities should demonstrate a shared responsibility for the project; one individual may have broad oversight, but successful applications will have multiple individuals working together on the entire project to demonstrate sufficient organizational commitment and capacity.

Budget [10] – Once the objectives that will guide the work in the implementation phase of the grant have been prioritized, begin to develop the details of the budget that will be necessary to carry out each activity.

The applicant's budget must be well-considered, necessary for the implementation of the project, remain within the funding parameters contained in this NGO, and demonstrate prudent use of resources. The budget will be reviewed to ensure that costs are customary and reasonable for implementation of each project activity.

The applicant must provide a direct link for each cost to the goal, objectives and activities in the Project Activity Plan that provides programmatic support for the proposed cost. In addition, the

applicant must provide documentation and details sufficient to support each proposed cost. Guidance on constructing a grant budget may be found in the Pre-award Manual for Discretionary Grants.

The budget submitted as part of the application is for the current grant period only.

Upload [00] – Evidence and/or documentation supplied as required uploads will support the Project Design Considerations, specifically, the statement of need and project description. Failure to submit a required upload(s) may result in a lower application score or an application being removed from consideration for funding.

II.5. Application Component Required Uploads

Application components listed in the table below are required to be included as part of the application. Failure to include a required upload may result in a lower application score or the application being removed from consideration for funding.

Required Uploads:

- ☐ Attachment 1 **Entity Overview** page from the applicant's [SAM/UEI](#) profile.
- ☐ Attachment 2 **Tutor Qualifications:** including but not limited to tutor expectations, content proficiency, effective facilitation, data practices, and supporting students with learning differences (i.e., preservice training, related credentials, etc.).
- ☐ Attachment 3 **Tutoring Health and Safety Plan:** addresses responsibility for maintaining the health, safety, and welfare while the students are under the control and supervision of a tutor. The grantee must describe how students will be properly supervised, consistent with local policies and regulations, to ensure student safety while students receive tutoring services.
- ☐ Attachment 4 **Statement of Need Documentation:** may include but is not limited to demographics, assessment data, descriptions of the target population(s), nonidentifying student data, personnel data, and research. Include as much relevant data as available.
- ☐ Attachment 5 **Vendor Contract, if applicable:** may include, but is not limited to, the description of scope and tutoring services in return for compensation (frequency of services, number of students served, scheduling, staffing, method of delivery, curriculum and data requirements, etc.).

II.6. Eligible Activities

Eligible activities include the provision of tutoring services for students. This may be delivered through two methods: contracting with an approved vendor (Purchased Services) or compensating LEA staff according to local collective bargaining agreements for their tutoring services (Instructional Services).

II.7. Non-Public Participation

☒ Not Applicable

II.8. Apportionment of Grant Funds

The applicant's project must be designed and implemented in conformance with all applicable state and federal regulations. Final awards are subject to the availability of funds. This program is 100% federally funded from two sources:

- \$16,958,083 - American Rescue Plan's Governor's Emergency Education Relief Fund (ARP GEER), ALN: 84.425V, FAIN: S425V210031
- \$35,000,000 - American Rescue Plan's State Fiscal Recovery Fund (SFRF), ALN: 21.027

Total funds available are \$51,958,083 over one year. The project period is from October 11, 2023, to August 31, 2024.

All operating New Jersey public school districts serving students in grades three (3) and/or grade 4 (four) are eligible for funding, with LEAs with third and fourth-grade students receiving competitive priority in accordance with the budget language associated with this grant opportunity. Applicants must score a minimum of 70 points to be eligible for funding consideration.

Applicants will be awarded according to the chart below. The award amounts are based on a tiered system aligned to LEA enrollment and English Language Arts and Mathematics proficiency levels as follows:

Figure 1. Maximum Award Size According to LEA Enrollment and Proficiency Levels

NJSLA Proficiency Level	Award Cap Sizes Based on SY23 Enrollment in Grades 3 and 4 (#students)				
	1-100	101-250	251-500	501-1000	1001+
<30%	\$48,000	\$97,000	\$192,000	\$384,000	\$768,000
31-50%	\$38,000	\$76,000	\$154,000	\$306,000	\$614,000
51-70%	\$28,000	\$58,000	\$115,000	\$230,000	\$460,000
71+%	\$18,000	\$38,000	\$76,000	\$154,000	\$308,000

Any remaining funds from each category will be used to fund awards according to rank order regardless of school district size or proficiency level.

All grant funds are subject to a 30-day liquidation period at the end of the grant term. At this time a final expenditure report will be due to close out the grant award.

Applicants may access proficiency level data on the NJDOE OGM Discretionary Grant [webpage](#) within two week of the posting of this NGO.

Grants funds will be used solely for the costs associated with and incurred to implement the grant program.

[Max Administrative Cap](#): 0% [NJ Travel Reimbursement Rate](#): \$0.47 per mile

[Max Benefit Cap](#): 68.45% [Max Indirect Costs Cap %](#): 0%

Please refer to [Section II.10.](#), Eligible Costs, and [Section II.11.](#), Ineligible Costs, for information regarding the allowability, inclusion of, and/or restriction(s) to indirect costs in a grant budget.

In the budget, applicants may request indirect costs from either 1) have a current federally negotiated indirect cost rate agreement or 2) have never received a federally negotiated indirect cost rate agreement. The indirect cost rate that may be used in budgeting is a de minimis rate, subject to the grant program's requirements. If indirect costs are requested, care must be taken to ensure that costs that would be considered indirect costs are not included in the budget as a direct cost. Additional guidance for indirect costs can be found in the [Pre-Award Manual for Discretionary Grants](#).

The NJDOE will remove from consideration all ineligible costs and costs not supported by the Project Activity Plan. The actual amount awarded will be contingent upon the applicant's ability to support its proposed budget upon application and ultimately will be determined by the NJDOE

through the pre-award revision process. The applicant's opportunity to make PAR will be limited by the NJDOE, which is not responsible for providing repeated opportunities for revisions or permitting the reallocation of the funds previously requested for costs that have not been approved or disallowed.

II.9. Eligible Costs

Use the [Quick Reference for Commonly Requested Costs](#) or the [Uniform Minimum Chart of Accounts](#) to locate the appropriate budget cost codes.

Please note that the passage of N.J.A.C 6A:23A-7 places additional administrative requirements on the travel of school district personnel. The applicant is urged to be mindful of these requirements as they may impact the ability of school district personnel to participate in activities sponsored by the grant program.

All eligible costs must be aligned with the constraints presented in [Section II.6.](#), Eligible Activities, and [Section II.11.](#), Ineligible Costs. Eligible costs include:

- **Purchased Services:** Costs for obtaining tutors from the approved vendor list for implementing high-impact tutoring services.
- **Instructional Services:** Costs for compensating existing LEA staff for implementing high- impact tutoring services.
- **Professional development opportunities:** Costs associated with LEA staff participation in professional development opportunities focused on supporting the implementation of high-impact tutoring services.
- **Instructional materials:** Costs associated with obtaining instructional materials, tutoring platforms, and other resources for high-impact tutoring purposes.
- **Evaluation strategies:** Costs for developing and implementing strategies that can be used to assess the effectiveness/impact of tutoring services on student learning.

II.10. Ineligible Costs

The NJDOE will not reimburse grantees or sub-grantees for ineligible costs. Ineligible costs include:

- **Indirect costs**
- **Outside of grant term:** Costs incurred outside of the grant term
- **Outside of allowable vendors:** Costs for the contracting of services provided by vendors not included on the NJDOE High-Impact Tutoring Provider List
- **Routine operating/administrative costs:** Costs for the routine operation or administration of the organization are not eligible
- **No benefit:** Costs incurred for salaries, services, or media which do not benefit the end user of the grant program
- **Not reasonable or necessary:** Costs that are not reasonable or necessary to carry out the grant
- **Outside of target area:** The purpose of the grant is to provide statewide coverage; therefore, any activities undertaken outside of a grantee's DHSS-designated territory must have prior NJDOE approval before costs are incurred
- **Poorly documented/undocumented:** Costs that are not supported by adequate documentation
- **Off-message:** Costs for media or instructional resources and materials which are prohibited or off message
- **Supplanting:** Costs for salaries, services, or media that are covered under other federal, state, or private funding

III. Grant Agreement and Program Requirements

Once the application for funding is approved in the PAR process, the EWEG grant application will convert to a Grant Agreement between the applicant and the NJDOE ([OMB Circular 07-05-OMB](#)). The grantee is expected to complete the goals and objectives laid out in the approved application and is expected to complete the activities established in its grant agreement and make satisfactory progress toward the completion of its approved action plan. Failure to do so may result in the withdrawal by NJDOE of the grantee's eligibility for the continuation of grant funding. The NJDOE will remove ineligible, inappropriate, or undocumented costs from funding consideration. To view and download the complete grant agreement documents, including attachments A and B of the grant agreement, click [here](#). To locate the appropriate budget costs codes, go to the [Uniform Minimum Chart of Accounts](#) web page.

III.1. Mandatory Orientation and Training

The grantee will be required to attend a program orientation. The NJDOE staff will acquaint the grantee with the general program information and requirements of the program, including grant management, mandated staffing, policies and procedures, and compliance with applicable state and federal program regulations.

III.2. Reporting Requirements

Grantees will be required to submit reports on activities according to the program report schedule (in [Section III.4.a.](#)). The grantee will ensure all reports are uploaded to EWEG by the due date. Failure to deliver the reports by the due dates may result in the grantee achieving an unsatisfactory rating and may result in the stop of all NJDOE program payments.

III.3. Interim Activity Report

These reports are to be delivered to NJDOE via electronic format uploaded or within the EWEG system. Reports submitted by other means will not be accepted and will be considered late if not uploaded by the due date listed in [section III.4.a.](#) This report tracks actual progress in meeting benchmarks and documenting measurable outcomes from the program activities listed in the application. Specific instructions for completing each report are found in this [link](#).

III.4. Fiscal Reimbursement and Fiscal Report Requirements

Reimbursement Request: The grantee shall request monthly, by the 15th of every month, reimbursement payment from the NJDOE. The grantee will complete a reimbursement request through the EWEG payment system. Specific instructions for completing this report are found at this [link](#).

Requests may begin once the contract has been fully approved and executed by the NJDOE. All programs are reimbursement-only programs. Grantees will be reimbursed based on the grantee's actual expenditures. Grantees must submit payment requests not later than the 15th of the month, via the EWEG system, to receive a payment, the following month. The reimbursements are closed 30 days before the end of the grant term. Funds owed to the grantee will be captured in the Final Expenditure Report.

In making disbursements to any third party with whom the Grantee may contract to undertake the Project, the Grantee shall ensure that disbursements are made upon delivery of satisfactory work product and in accordance with the Department's program policies.

Fiscal Interim Reports: These reports are due as stated in section III.4.a. with the interim activity report. In this report, the grantee will report on actual expenditures incurred during their reporting period and reconcile the expenditures reported in the interim report should match what has been paid to the district during the reporting period.

Final Expenditure Reports: This is the same report as the Interim Report, except that this report generates a final payment to the grantee upon selecting the “final report radial button.”

III.4.a. Reporting Periods

Reimbursement requests are due by the 15th of every month.

Note: All Reimbursement Requests must be submitted prior to August 15, 2024. Funds not requested by this date will be forfeited by the applicant.

The reporting periods for fiscal and activity reports are as follows:

Report:	Reporting period:	Date Due:
First Interim	10/11/2023 – 1/31/2024	2/15/2024
Second Interim	10/11/2023 – 4/30/2024	5/15/2024
Final	10/11/2023 – 8/31/2024	9/30/2024

III.5. Monitoring

The NJDOE Program Managers may schedule on-site monitoring visits or virtual meetings with the Program Coordinator during or after the term of the program contract to review program performance and fiscal documentation. These visits/meetings may be a comprehensive program assessment or oriented toward a performance review in specific areas. In either case, program staff shall cooperate with Program Managers and provide them with files and other information as requested. Districts are required upon request to share details regarding their implementation of awarded funds with NJDOE staff in either written form or in-person site visits and interviews.

III.6. Acceptable Documentation for Grant Monitoring

Full and detailed documentation for grant expenditures shall be retained at the organization's level for monitoring purposes. This shall include expenditures of the grantee and all sub-grantees.

III.6.a. Activity Reports

These reports consist of documentation and/or evidence of program activities. They can be in the form of a properly completed programmatic Activity Report uploaded into EWEG or emailed to the program officer detailing events and activities. To supplement activity reports, other documentation, such as student testimonials, photos, flyers, video links, and newspaper clippings/article links related to the use of grant funds, are welcome but not mandatory. Documentation should be retained with the grantee for monitoring purposes unless otherwise specified by the program office.

The Program Office will collect metrics on the tutoring program throughout the grant; however, the Final Activity Report will include, but not be limited to, the following information:

- a) All criteria used to identify students for the tutoring program

- b) Program enrollment information
 - 1. Number of students enrolled in the program
 - 2. Relevant, nonidentifying student information (ID, gender, race/ethnicity, student group (students with disabilities, English language learners, free and reduced price lunch, etc.), school, grade, subject, etc.)
 - 3. Attendance records for each student and tutor per site
- c) Structure of the program
 - 1. Confirmed list of program site(s) and how identified students were ensured access to programs (transportation, etc.)
 - 2. Hours of programming each student received per site
 - 3. Program schedule per site (i.e., number of days per week tutoring was provided, per subject)
- d) Student academic outcomes, per site/grade/subject or impact as a result of the LEAs tutoring program
 - 1. Records of assessments administered to students as part of the tutoring program;
 - 2. Data analysis and summary of local student outcomes and achievement per grade, student group, and subject area (i.e., student demographic data, attendance, grades, performance assessments, surveys, etc.);
 - 3. Data analysis and summary of student performance per grade, student group, and subject area on state level assessments pre and post tutoring program; and
 - 4. Summary of program successes, challenges, and adjustments to programming to improve student outcomes.
- e) Evaluations from teachers, students, families, and other stakeholders associated with sites where tutoring programs took place
- f) Analysis of project goal attainment and alignment with the project plan

III.7. Reimbursements

Staffing – All timesheets and payroll records for any salaries paid using funds must be retained by the grantee for both monitoring and reimbursement purposes. If staff is assigned part-time to the grant, a cost allocation sheet should accompany the reimbursement request. If vendors are used to deliver services, receipts, invoices, and purchase orders for vendor services with enough detail to determine that the expenditure is an eligible cost under the grant program must be retained by the grantee for both monitoring and reimbursement purposes.

Travel – Mileage records must include the date of travel, the point of origin and its designation (home/office), the sites visited, the purpose of the travel, and the ending location. Commutation must be subtracted from the mileage claimed. The travel reimbursement rate is \$0.47 per mile. Receipts for parking and tolls must be retained.

Mailings – Receipts for postage and other materials and services associated with photocopying, printing, and distribution of materials. Cost allocation based upon agency budget may be acceptable. Please review with the NJDOE representative.

Training – Receipts for payment of training providers, course materials, venue, proof of attendance, and copies of any certificates awarded.

Other costs – Receipts, invoices, and purchase orders with enough detail to determine that the expenditure is an eligible cost under the grant program.

III.8. Grant Amendments

All requests for amendments must be submitted a minimum of 90 days before the end date of the grant agreement via the EWEG system.

Amendment modification forms are available [here](#). Amendment modifications are initiated and submitted through the EWEG system to be uploaded into the Upload Tab in the grant application. Instructions on how to initiate the amendment are available in [the Pre-Award Manual](#). Use the [Quick Reference for Commonly Requested Costs](#) or the [Uniform Minimum Chart of Accounts](#) to locate the appropriate budget cost codes.

Amendments are required if the following situations occur:

- Changes to the program activity and request for no-cost time extension;
- Budget transfers greater than ten percent of the total approved budget into a previously approved line item;
- Changes to 200-320 Purchased Professional Education Services (subgrantee costs) previously approved in the budget;
- Budget transfer to a line not previously approved in the budget;
- Equipment: Grantees are limited to the specific equipment items listed in the final approved grant application budget. To comply with federal requirements, all equipment purchases require prior NJDOE approval. You can pay more or less than the approved amount, but the approved equipment item cannot be changed without permission (i.e., no additions, deletions, or substitutions to the approved equipment list);
- Changes to Indirect Costs.

Important Note: The subgrantee is subject to the same terms and conditions as the grantee and is responsible to you (the lead agency) for the agreed-upon scope of work (approved goals, objectives, and activities) and the expenditure of subgrant funds. Any changes (program or fiscal) requested by a subgrantee must be reviewed by the grantee. If NJDOE requires subgrantee amendment approval and you support the changes, forward the requested changes to the NJDOE Program Office for review. As the grantee, you do not have the authority to approve any changes in their project activities, any budget variances, or without prior approval by the NJDOE.

III.9. Suspension/Cancellation of Grant/Loan Agreement and/or Reduction in Funding

The NJDOE reserves the right to suspend and/or cancel this Grant Agreement for nonperformance of any of the Grant/Loan Agreement provisions. Failure by the grantee to comply with agreement stipulations, standards, or conditions may give the NJDOE cause to suspend this agreement and withhold further payments, prohibit additional obligations or project funds pending corrective action, disallow all or part of the cost associated with the noncompliance, terminate this agreement, or take other remedies that may be legally available.

Formal written notice of suspension/cancellation of Grant Agreement and/or reduction in funding will be provided to the grantee in advance of the adverse action to be taken together with recommendations to correct deficiencies. Grantees that correct deficiencies in accordance with guidance provided in the written notice shall be reinstated.

III.10. Grant Close Out

The grantee shall provide all documentation necessary to close out this agreement within sixty (60) days of the grant agreement's ending date. If performance is ahead of schedule, the documentation should be submitted within 60 days of the conclusion of grant activities. Documentation will include the Final Reports referenced in [Section III.4.a.](#)

III.11. Federal Requirements

☒ Not Applicable

Vander Weele Group^{LLC}

A New Jersey Certified
Woman-Owned Business Enterprise

Response to:

New Jersey Department of Education

**Engagement Query G4018
Integrity Monitoring for the
New Jersey
Learning Acceleration Program:
High-Impact Tutoring Grant**

November 21, 2023

November 21, 2023

[REDACTED]
State Contract Manager and Fiscal Manager
New Jersey Department of the Treasury
TreasuryIM@treas.nj.gov

[REDACTED]
Agency Contract Manager
New Jersey Department of Education
[REDACTED]

Dear [REDACTED]:

The Vander Weele Group^{LLC} is pleased to present this proposal to the New Jersey Department of Education (NJDOE) to provide Integrity Monitoring Services for the New Jersey Learning Acceleration Program: High-Impact Tutoring Grant.

The Vander Weele Group—a 20-year-old niche firm focused exclusively on grants oversight—offers nationwide expertise in Federal grants to assist the NJDOE. We are a New Jersey certified Woman-Owned Business Enterprise (WBE) and a Disadvantaged Business Enterprise (DBE). We offer a powerful team that specializes in K-12 and early childhood education. Every day, we interpret Federal and local grant requirements and have created a library of resources explaining the requirements of Federal funding streams, including U.S. Treasury Rules and the Office of Management and Budget's (OMB) 2 CFR Part 200: *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, commonly called the "Uniform Guidance." We have documented methodologies and decades of experience in grants oversight and developed customized internal software for grants monitoring in K-12 education and other grant-funded programs.

Since founding the firm in 2003, I have overseen education grants monitoring and related oversight services in more than 20 states, including New Jersey. I am a former member of the turnaround team for Chicago Public Schools, its former Inspector General, and the author of a book on public education. Our Director of Fiscal Oversight, Dr. Kristen Mokofisi, began her career as an educator and has overseen statewide Federal education grants programs in Nevada, including the 21st Century program under Title IV-B, which provides before- and after-school and summer tutoring to K-8 students. She currently manages a team that has monitored more than \$3.6 billion of COVID-19 relief funds for K-12 and early childhood education in Illinois. We also oversaw the creation of a sub-recipient monitoring program for the State of New Jersey.

We trust this proposal meets your expectations. Thank you for your time and consideration.

Sincerely,



Maribeth Vander Weele, President, Vander Weele Group^{LLC}
2515 Waukegan Road, Suite 301
Bannockburn, IL 60015
maribeth@vanderweelegroup.com 773-919-1100

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I. INTRODUCTION

A. Overview

The Vander Weele Group is pleased to present this proposal to the New Jersey Department of Education (NJDOE) to provide Integrity Monitoring Services for the New Jersey Learning Acceleration Program: High-Impact Tutoring Grant. We provide turn-key oversight and compliance solutions for large-scale Federal, state, and local grant programs. We are passionate about making grants management meaningful and mission-based: focusing oversight on conditions that positively impact the unique needs of local communities. We offer programmatic and fiscal grants monitoring, grants management, data analytics to detect fraud, and anti-fraud training

B. Competitive Edge

Key reasons to engage the Vander Weele Group are as follows:

- **We understand New Jersey requirements.** As an actively working Integrity Monitor, our team is experienced in New Jersey's framework for applying disaster recovery oversight. We have provided integrity monitoring and consulting for seven New Jersey agencies. Our team currently monitors the NJDOE's Additional or Compensatory Special Education and Related Services to Students with Disabilities Beyond Age 21 (ACSERS) program for which we monitor selected districts across the North, Central, and Southern New Jersey regions.
- **We know education.** Collectively, our team has decades of experience as K-12 practitioners at the programmatic level, as administrators at the district and state level, and as grants monitors across an array of states. Our experience crosses 30 educational grants including the monitoring and management of billions of dollars in COVID relief funds down to the smallest of state educational grants. We have designed and executed monitoring services for all *Every Student Succeeds Act* (ESSA) Title programs, including Title IV-B, 21st Century Community Learning Centers; *Individuals with Disabilities Education Act* programs; *Elementary and Secondary School Emergency Relief* (ESSER) funding, Early Childhood Block Grants, and more.
- **We are grant specialists.** Grants monitoring and compliance are our sole focus. This permits our recruitment, onboarding, training, software, and business processes to focus on a single goal: to improve grants oversight. Our experts collectively have decades of experience in applying monitoring and financial standards to Federally funded grant programs nationwide. Our team consists not only of accountants but of practitioners who have provided oversight to massive government programs. That means we appreciate the complexities and challenges of working in government environments driven by important visions but challenged by obstacles ranging from legacy software to long hiring processes.
- **We are systematized.** We have carefully crafted and documented methodologies for nearly every aspect of grants monitoring and management, some of which are embedded in our customized web-enabled grants monitoring software.
- **We know project management.** We approach the engagements we lead in a highly logical and sequenced fashion. We build project management tools around planning and process, which reduces chaos in service delivery and facilitates excellence and consistency. The logic and structure with which we approach our work are reflected in consistently strong client recommendations and an excellent client retention rate. In every instance in which there

was an opportunity to do so, our clients over the last decade have renewed our contracts with terms as long as seven years.

C. Our Understanding

As we understand it, the New Jersey Department of Education established the New Jersey Learning Acceleration Program: High-Impact Tutoring Grant to correct learning loss among students affected by the COVID-19 pandemic. This program prioritizes districts with students in grades three and four to provide high-dosage, intensive tutoring via before-school, after-school, and summer programs. Although grades three and four are prioritized, Local Educational Agencies (LEAs) are authorized to serve additional students as needed. Eligible recipients are public school districts, charter schools, and renaissance schools. This single-year, \$51,958,083 grant, which is funded by \$16,958,083 from the American Rescue Plan Governor's Emergency Education Relief Fund (ARP-GEER) and \$35,000,000 from the Coronavirus State and Local Fiscal Recovery Fund (SFLRF), began October 11, 2023, and will run through August 31, 2024. Applicants were eligible to apply for as much as \$768,000 based on a tiered student-enrollment system. The grant application period closed on September 20, 2023, with awards expected to be made by the end of calendar 2023. Public school districts, renaissance schools, and charter schools were eligible to apply.

D. Timeline

Subject to discussion and possible revision based on the kickoff meeting, we estimate the following approximate timeframes for individual milestones:

- Kickoff Meeting: Within five business days of receipt of the engagement letter.
- Risk Assessment of NJDOE: Within 90 days of the date of engagement.
- Risk Assessments of School Districts: Within 110 days of the date of engagement.
- Work Plan: Within 120 days of the date of engagement.
- Interim Reports/Biweekly Meetings: Biweekly after the kickoff meeting.
- Reporting:
 - Draft Quarterly Reports will be provided on the last business day of each quarter.
 - Final Quarterly Reports will be provided 15 business days after the end of each quarter.
 - Monthly Reports will be submitted to the NJDOE on the last business day of each month.
 - Project Completion Report will be submitted by Monday, September 16, 2024.

II. PHASE I: PLANNING

A. Kickoff Meeting

If privileged to serve NJDOE, our engagement team will meet with NJDOE staff within five days of the Purchase Order being provided to the Vander Weele Group. Before the scheduled kickoff meeting, we will send an agenda for the meeting. Tentative agenda items during the kickoff or subsequent meetings will include:

- Overall engagement expectations, assumptions, and definition of consultant and project success.
- Program strengths and challenges.
- Risk assessment procedures and an inquiry of what data for the risk assessment is already accessible.
- The technology systems and means to access them.
- The monitoring process and other elements of the monitoring plan.
- The grant application, award, reporting, and reimbursement process.
- The preliminary project work plan including project schedules, timelines/due dates, activities, and deliverables.
- Communication protocols; e.g., who is the primary point of contact and who should be copied on communications.
- Existing and contemplated budgeting and reporting tools.
- Other information, as it arises.

We will document the meeting and provide minutes to NJDOE participants and other selected stakeholders.

III. WORK PLAN AND TOOL DEVELOPMENT

Based on the results of the risk assessment, we will develop and submit a work plan for monitoring selected districts for fraud, waste, and abuse that includes a review of risk factors relevant to the Learning Acceleration High Impact Tutoring Grant Program. The work plan will incorporate a sampling methodology consistent with nationally recognized audit standards, such as the American Institute of Certified Public Accountants (AICPA) or the U.S. Government Accounting Office (GAO), and we will document our rationale for the sampling methodology used. Monitoring objectives will include both compliance and internal controls.

We will develop monitoring tools. For each monitoring standard—also called indicator, requirement, or protocol—we will identify for internal use:

- The cited authority.
- Language describing the standard.
- Evidence considered sufficient to demonstrate compliance.
- The process required to gather that evidence (interviews/file reviews/purchase order reviews, sampling standards, staff credentials, etc.).
- Standardized language describing a typical finding, which can be customized by the Monitor and tailored to field conditions.
- Standardized or customized language for the corrective action plan, if needed.
- A Compliance Matrix (also called the “Monitoring Rubric”) contains a set of indicators—or standards—to be monitored.

IV. RISK ASSESSMENT – NEW JERSEY DEPARTMENT OF EDUCATION

In conformance with the New Jersey Integrity Monitor Guidance, Updated June 2021, we will perform a risk assessment of the NJDOE's existing controls for preventing fraud, waste, and abuse in Federal grants programs.

A. Policies and Procedures

The Vander Weele Group team has extensive expertise in reviewing and developing manuals, policies, and procedures and using them as the basis for training programs. For one client alone, the Bureau of Indian Education, our firm created more than 50 manuals, training materials, reports, template forms, sample policies and procedures, and other materials to provide technical assistance to grantees. We are currently documenting grant management procedures on behalf of another New Jersey agency in a separate engagement. This exposure to client policies and procedures, coupled with our comprehensive understanding of ARPA and U.S. Treasury requirements, makes us highly qualified to help ensure NJDOE's materials are compliant with applicable laws and regulations.

We will review the adequacy of financial, acquisition, and grants management policies and procedures to control for fraud while achieving the goals of the organization and meeting the requirements of the Learning Acceleration High Impact Tutoring Grant.

After a discussion with NJDOE staff about relevance and applicability, we will request policies that address:

- Accounting for grant monies and ensuring allowability with NJDOE and grant requirements
- Audit Resolution
- Budgeting of grant monies, including budget amendments
- Contract administration
- Conflicts of interest
- Credit card use
- Documenting personnel expenses
- Federal draws
- Fraud, waste, and abuse
- Inventory
- Payroll
- Personally Identifiable Information (PII)
- Procurement of Equipment, Supplies, and Materials
- Retention of records for appropriate document retention and reporting with the Federal Financial Accountability and Transparency Act (FFATA) and/or Treasury Office of Inspector General.
- Timekeeping

- Time and effort reporting for federally funded positions
- Travel
- Vendor payments

In reviewing policies and procedures, we will look for gaps in content, gauge whether the content is adequately directed to and appropriate for the audience, and ensure that directives are clearly stated and understandable, even to those with no experience in the program.

To identify gaps in content or logic in the policies and procedures, we will draw both on our team's expertise in monitoring grants and our previous and ongoing experience in New Jersey but also on interviews with stakeholders such as those administering the policies and those tasked with following the policies and procedures to identify common areas of non-compliance or confusion. We will interview NJDOE stakeholders, as necessary. If our review of policies and procedures indicates areas of non-compliance, we will recommend additions or modifications to make them compliant.

B. Organizational Structure and Capacity

As part of the risk assessment and program review, we will analyze NJDOE's organizational leadership, capacity, expertise, and experience managing and accounting for Federal grant funds. We will review relevant documentation of human resource information including organizational charts, staff positions, and resumes. We will collect input from the individuals/units that disburse funds and/or administer the program.

In analyzing the human resource structure for adequate capacity, we may recommend a Resource Analysis that maps—for selected tasks—work to be completed with the available labor hours to ensure that job descriptions, goals, and objectives can be reasonably performed and achieved. Our Resource Analysis tool permits users to customize the number of available hours for each position by subtracting from the total available hours that are allocated for holidays, vacations, personal, sick, funeral, jury duty, training, and internal meetings. Our default number is 1,832 hours per position per year, but this will be tailored to the NJDOE team. To determine capacity, users can then estimate the amount of time required to conduct repetitive activities such as Monitoring Reviews, approving sub-recipient grant applications, reviewing program reports, and so forth.

Our analysis will discuss the NJDOE's technological capacity and consider the potential of outdated financial management systems.

C. Internal Controls

A key requirement under 2 CFR § 200.303(a) is to establish and maintain effective internal controls over the Federal award 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 award. These internal controls should comply with the guidance in the "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control-Integrated Framework," issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). Vander Weele Group team members are well-versed in these requirements and experienced in reviewing clients' internal controls to ensure they comply.

The first step we take is to understand the control activities, or specific actions the agency takes to reduce the risk of not achieving program objectives. This step includes:

- Analyzing and documenting the processes and procedures of the Learning Acceleration

Program that were established and designed to prevent and detect fraud, waste, and abuse;

- Reviewing the grant application requirements to identify program goals, objectives, and performance metrics;
- Interviewing personnel and performing procedural walkthroughs to understand the procedures in place to measure not only fiscal compliance but to report on and achieve programmatic objectives;
- Reviewing relevant written policies and procedures, program guides, or other internally memorialized publications to understand the breadth and depth of control activities; and
- Documenting any data analytics undertaken by the NJDOE.

The Vander Weele Group will analyze the information gathered, organized, and used to make determinations. Our team will perform testing procedures to evaluate:

- The effectiveness of Learning Acceleration Program High Impact Tutoring Grant policies and procedures;
- Data collected and organized throughout the program's life cycle, and
- Information gathered from previous steps performed including the risk assessment, employee interviews, and walkthroughs.

As part of our assessment, we will inquire about the NJDOE's internal controls, ranging from segregation of duties among individuals handling and accounting for grant funds to timely bank account reconciliations, a critical component in preventing waste, fraud, and abuse. We will inquire whether the NJDOE's leadership and finance team have received training on budgeting.

We will test another important requirement, found in 2 CFR § 200.302 (a)(b) *Financial Management*, which mandates that financial systems tracking Federal grant funds include or facilitate the:

- Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include, as applicable, the Catalog of Federal Domestic Assistance title and number, Federal award identification number and year, name of the Federal agency, and name of the pass-through entity.
- Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with selected provisions.
- Records that adequately identify the source and application of funds for Federally funded activities. These records must contain information about Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest, and be supported by source documentation.
- Effective control over, and accountability for, all funds, property, and other assets.
- Classification of expenditures (e.g., personnel, commodities, equipment) and comparison of expenditures with budget amounts for each Federal award.
- Written procedures to implement the requirements of 2 CFR § 200.305 *Payment*.
- Written procedures for determining the allowability of costs in accordance with Subpart E—Cost Principles and the terms and conditions of the Federal award.

In summary, we will test for the internal controls mentioned above to ensure there are adequate systems to prevent, detect, and investigate fraud or other types of integrity breaches in place at every level of the multi-tiered recovery funds distribution program.

D. Duplication of Benefits

In conducting the aforementioned risk analysis, we will seek to identify possible scenarios in which benefits can be improperly duplicated. Duplication of benefits occurs when an entity or person receives funds from one or more sources for the same purpose and in excess of the total amount needed or legally allowed. For example, sources providing the same benefit for the same purpose can include sub-recipient grants in addition to donations, insurance proceeds, other government sources, and loans. A duplication of benefits analysis includes determining the sub-recipient's need and later subtracting the duplicative assistance. In addition to standard duplication of assistance checks, our team has developed algorithms that can flag what appear to be duplicate benefits that invite further analysis. We will review related NJDOE procedures to ensure they guard against duplication of benefits.

E. Previous Audits of NJDOE

We will request the results of previous audits and audit findings of the NJDOE from state or Federal oversight agencies for review. We will seek to identify any deficiencies reported in them and determine whether NJDOE addressed them in a timely, appropriate, and effective manner to resolve any deficiencies

V. COMPARATIVE RISK ASSESSMENT TO SELECT DISTRICTS FOR MONITORING

As required by 2 CFR § 200.332(b), we will perform a comparative risk assessment to evaluate each sub-recipient's risk of non-compliance with Federal statutes, regulations, and the terms and conditions of the sub-award for the purposes of determining the appropriate monitoring needed to ensure that federal funds are used properly. Based on this assessment, we will select school districts for monitoring, based on higher risk indicators.

Under the Uniform Guidance, factors in determining risk that *may* be considered include:

- The sub-recipient's prior experience with the same or similar subawards;
- The results of previous audits including whether or not the sub-recipient receives a Single Audit in accordance with Subpart F, and the extent to which the same or similar subaward has been audited as a major program;
- Whether the sub-recipient has new personnel or new or substantially changed systems; and
- The extent and results of Federal awarding agency monitoring (e.g., if the sub-recipient also receives Federal awards directly from a Federal awarding agency).

This assessment involves comparing risk among multiple school districts using readily available quantitative data and ranking the districts according to risk. After consulting with NJDOE, we will assign objective, quantitative scores to permit ranking risk levels of individual districts. To permit adequate differentiation between grantee risk levels, these scores employ a Likert scale of 1 to 5. In the authors' experience, scales less than that result in overly broad strands of grantees that hamper the selection process.

A. Eligibility

We will review awarded districts' grant applications, associated documentation, curricula, and other work products to ensure they meet the foregoing eligibility requirements.

As we understand it, eligibility recipients:

- Must be a public school district, charter school, renaissance school, or serving students in grades three and four, although Local Educational Agencies may elect to serve additional students.
- Must have a Unique Entity Identifier (UEI) to comply with the Federal Fiscal Accountability Transparency Act (FFATA).
- Must create a profile in the NJDOE's Electronic Web-Enabled Grant System (EWEG's) System for Award Management application and upload its UEI.
- Provide high-intensity, high-dosage tutoring to students in grades three and four using vendors from the approved list of tutoring providers or local staff who deliver high-impact, research-based tutoring.

B. Cost

We will review districts' cost documentation to ensure expenditures are "well-considered, necessary for the implementation of the project, and remain within the funding parameters" specified in the Notice of Grant Opportunity. Eligible costs include:

- Purchased services: Costs for obtaining tutors from the approved vendor list.
- Instructional Services: Costs for compensating current LEA staff for implementing tutoring services.
- Professional Development: Costs for LEA staff participation in professional development opportunities for supporting high-impact tutoring services.
- Instructional Materials: Costs for instructional materials, tutoring platforms, and other resources for high-impact tutoring.
- Evaluation Strategies: Costs for developing and implementing strategies to assess the effectiveness of the services on student learning.

Finally, we will document any costs considered unallowable and notify the NJDOE of any reimbursement requests for such costs.

C. Vendor Payment Documentation

For payments to tutoring providers, we will review purchase orders, invoices, and receipts and review them for inclusion on the NJDOE High-Impact Tutoring Provider List.

D. Procurement

Effective November 12, 2020, the Uniform Guidance introduced procurement standards that significantly expanded the responsibilities of sub-recipients to procure goods and services with competition and in compliance with 2 CFR Part 200: *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* §§ 318 through 327. Our experience has demonstrated that noncompliance when procuring goods and services is one of the most frequent missteps by sub-recipients.

For example, we will review procurement documentation to ensure sub-recipients:

- Have and follow documented procurement procedures.
- Maintain oversight to ensure that contractors perform in accordance with the terms of their contracts or purchase orders.
- Maintain written standards of conduct covering conflicts of interest and governing the actions of employees engaged in the selection, award, and administration of contracts.
- Adhere to procedures that avoid the purchase of unnecessary and duplicative items.
- Conduct all procurements in a manner that facilitates full and open competition.
- Take affirmative steps to contract with minority- and woman-owned businesses and labor surplus area firms.
- Provide a preference for goods, products, or materials produced in the United States.
- Include the contract provisions provided in Appendix II of the Uniform Guidance.

We will review sub-recipients' compliance with these requirements.

As a woman-owned business, certified at the federal, state, and local levels, the Vander Weele Group is well familiar with requirements for Minority/Women-Owned Business Enterprises as well the State's small business goals.

E. Program Requirements Compliance

We will review tutoring programs to ensure they meet grant requirements. These include:

- Staffing by qualified teachers or paraprofessionals with adequate training and ongoing support.
- High-quality instructional materials closely aligned with the adopted curriculum.
- Regular use of data, including diagnostic assessments to tailor instruction.
- "High dosage," meaning programs that deliver tutoring at least three times per week, or in week-long intensive sessions.
- Scheduling that delivers tutoring during the school day when possible.
- Size, with one-on-one tutoring being ideal but small groups (up to four students) being acceptable.
- Consistency: one tutor should be assigned to individual students or small groups for the duration of their tutoring program.
- In-person delivery of tutoring.

We will review tutoring vendors' Interim Activity Reports to ensure they are measuring the outcomes of the tutoring they deliver. Evidence may include:

- Records of assessments administered through the tutoring program.
- Data analysis and summary of student outcomes.
- Data analysis and summary of student performance by grade, by student group, and by subject area.
- Summary of program successes, challenges, and adjustment to improve student outcomes.
- Evaluations from teachers, students, families, and other stakeholders at learning sites.

- Analysis of project goal attainment and alignment with the project plan.

F. Onsite Monitoring

If our monitoring review indicates a need for onsite monitoring, we will first document our reasoning, based on:

- Significant findings in quarterly or interim reports.
- Unresponsiveness to requests for information.
- Noncompliance with Federal reporting requirements.
- Allegations of misuse of funds.

After conferring with NJDOE staff, we will perform onsite monitoring as necessary.

VI. REPORTING

A. Quarterly Integrity Monitor Reports

We will provide draft quarterly reports to NJDOE on the last business day of every quarter using the NJDOE-provided Quarterly Report template. These draft reports will explain the services provided during the foregoing quarter and any findings of fraud, waste, and abuse. Should we report any findings of fraud, waste, or abuse, we realize NJDOE has an opportunity to respond within 10 days of receiving the report. Within 15 days after the end of each quarter, we will deliver the final Quarterly Report, incorporating NJDOE's comments, to the State Treasurer, who will share the reports with the Governor's Disaster Recovery Office (GDR), the Senate President, the Speaker of the General Assembly, and the State Comptroller.

B. Additional Reports

We understand the Office of the State Comptroller (OSC) may request additional reports or memoranda to help the OSC evaluate the presence of fraud, waste, or abuse. OSC may also request that we share any proposed Corrective Action Plans to be evaluated for successful implementation.

C. Monthly Reports

With each monthly invoice, we will provide a report explaining hours billed for each consultant, an evaluation of the effectiveness of fraud prevention activities, and indications of fraud, waste, and abuse that NJDOE should address immediately along with recommendations for risk mitigation.

D. Project Completion Report

We will submit a Project Completion Report at the end of the engagement. That report will detail the scope of the engagement, methodologies used, documentation of work performed, a summary of findings, and recommendations to mitigate the risks of fraud, waste, and abuse in the Learning Acceleration High Impact Tutoring Grant and future programs.

E. Reports of Fraud, Waste, Abuse, or Potential Criminal Conduct

Should we find fraud, waste, abuse, or misuse of funds, we will report our findings immediately to the GDRO, the OSC, the State Treasurer, the State Contract Manager, and the Accountability Officer. Issues of potential criminal conduct will be reported immediately to the Office of the Attorney General.

VII. BUDGET

Integrity Monitoring - Price Sheet									
	Vander Weele Group, LLC								
	Cell to be completed by Bidder								
	Staffing Category	Hourly Billing Rate (\$)	Hours	Amount (\$)	Total Cost (\$)	Hourly Discounted Billing Rate (\$)	Amount (\$)	Total Cost (discounted) (\$)	
Risk Assessment (Includes Dept Review and Individual District Reviews)	Partner/Principal/Director	\$ 250.00		\$0.00	\$104,155.26	\$237.50	\$0.00	\$103,647.06	
	Program Manager	\$ 241.91	42	\$10,160.22		\$229.81	\$9,652.02		
	Project Manager	\$ 170.00		\$0.00		\$170.00	\$0.00		
	Supervisory/Sr. Consultant	\$ 222.17		\$0.00		\$211.06	\$0.00		
	Consultant	\$ 135.00	160	\$21,600.00		\$135.00	\$21,600.00		
	Associate/Staff	\$ 130.00		\$0.00		\$130.00	\$0.00		
	Subject Matter Expert	\$ 192.54	376	\$72,395.04		\$192.54	\$72,395.04		
	Administrative Support	\$ 95.00		\$0.00		\$95.00	\$0.00		
			578						
Work Plan Development (Includes dev. of monitoring tools)	Partner/Principal/Director	\$250.00		\$0.00	\$6,748.78	\$237.50	\$0.00	\$6,651.98	
	Program Manager	\$241.91	8	\$1,935.28		\$229.81	\$1,838.48		
	Project Manager	\$170.00		\$0.00		\$170.00	\$0.00		
	Supervisory/Sr. Consultant	\$222.17		\$0.00		\$211.06	\$0.00		
	Consultant	\$135.00		\$0.00		\$135.00	\$0.00		
	Associate/Staff	\$130.00		\$0.00		\$130.00	\$0.00		
	Subject Matter Expert	\$192.54	25	\$4,813.50		\$192.54	\$4,813.50		
	Administrative Support	\$95.00		\$0.00		\$95.00	\$0.00		
			33						
On-going Monitoring	Partner/Principal/Director	\$250.00		\$0.00	\$171,204.28	\$237.50	\$0.00	\$170,526.68	
	Program Manager	\$241.91	56	\$13,546.96		\$229.81	\$12,869.36		
	Project Manager	\$170.00		\$0.00		\$170.00	\$0.00		
	Supervisory/Sr. Consultant	\$222.17		\$0.00		\$211.06	\$0.00		
	Consultant	\$135.00	372	\$50,220.00		\$135.00	\$50,220.00		
	Associate/Staff	\$130.00		\$0.00		\$130.00	\$0.00		
	Subject Matter Expert	\$192.54	558	\$107,437.32		\$192.54	\$107,437.32		
	Administrative Support	\$95.00		\$0.00		\$95.00	\$0.00		
			986						
Reports (Includes internal and client meetings)	Partner/Principal/Director	\$250.00		\$0.00	\$40,517.23	\$237.50	\$0.00	\$39,658.13	
	Program Manager	\$241.91	71	\$17,175.61		\$229.81	\$16,316.51		
	Project Manager	\$170.00		\$0.00		\$170.00	\$0.00		
	Supervisory/Sr. Consultant	\$222.17		\$0.00		\$211.06	\$0.00		
	Consultant	\$135.00	26	\$3,510.00		\$135.00	\$3,510.00		
	Associate/Staff	\$130.00		\$0.00		\$130.00	\$0.00		
	Subject Matter Expert	\$192.54	103	\$19,831.62		\$192.54	\$19,831.62		
	Administrative Support	\$95.00		\$0.00		\$95.00	\$0.00		
			200						
	Allowance for Travel Expenses and Reimbursement if on-site monitoring required				\$10,000.00			\$10,000.00	
	Total Cost (non-discounted)				\$332,625.55				
	Total Cost (if discounted)								\$330,483.85

VIII. OUR TEAM

Team member resumes are presented on the following pages.

MARIBETH VANDER WEELE

President of the Vander Weele Group^{LLC}

Maribeth Vander Weele leads this Chicago-based firm specializing in grants management and oversight for Federal, state, local, tribal, and international agencies. Under her vision and direction, the firm serves as a trusted partner to its clients, providing exceptional support and technical assistance and ensuring fiscal control, fraud prevention, compliance, risk management, and, ultimately, effective program delivery.

Maribeth is a recognized thought leader, speaker, and author who has consulted with countless complex organizations and whose life's work has centered on promoting integrity. Before launching her firm, she was appointed Chief of Investigations and then Inspector General of Chicago Public Schools, where she spearheaded significant change initiatives and lasting system transformation. She previously authored *Reclaiming Our Schools, the Struggle for Chicago School Reform*, which became the roadmap for nationally acclaimed reform. Maribeth's mission-driven passion for excellence, high-level government experience, and deep knowledge are at the core of the Vander Weele Group's impact.

KEY EXPERTISE: STRATEGY AND EXECUTION | CLIENT RELATIONSHIP BUILDING | TEAM LEADERSHIP | PROJECT MANAGEMENT | GRANTS MANAGEMENT AND OVERSIGHT | INVESTIGATIONS | COMPLEX PROBLEM SOLVING | WRITING | PUBLIC SPEAKING

SECTOR EXPERIENCE: EDUCATION | HUMAN AND SOCIAL SERVICES | CONSTRUCTION AND REAL ESTATE | FINANCIAL SERVICES | INSURANCE | CRIMINAL JUSTICE | GAMING AND HOSPITALITY | TRANSPORTATION | LABOR AND ECONOMIC DEVELOPMENT

EXPERIENCE

VANDER WEELE GROUP^{LLC}

2003 – Present

President

Founded, grew, and evolved the firm to provide critical grants management and monitoring services to diverse public sector clients facing unprecedented challenges. Built a 30+-member team with government program experience and the full range of grants management expertise.

- Spearheaded development of the firm's processes, procedures, and systems, including proprietary grants monitoring software, to ensure efficient project management and consistently exceptional client service across all engagements.
- Cultivated team capabilities to deliver timely, structured, and high-quality project results, including accurate data analysis, detailed research, careful reviews, and meticulously documented conclusions.
- Won highly competitive multi-year projects and renewals, forged trusted client relationships, and established foothold across diverse agencies in 3 states; quadrupled annual revenues since 2018.
- Earned place on the General Services Administration schedule (pre-qualified by the Federal government) and as one of 8 prequalified firms in a Blanket Purchase Agreement (BPA) for the State of New Jersey.
- Contributed to myriad client results, including up to hundreds of millions of dollars in savings, resolution of audit findings, and effective implementation of large-scale critical programs.
- Designed and executed Safe Schools programs for the Bureau of Indian Education, ensuring program effectiveness and fiscal compliance across 183 schools receiving Federal funds (in 23

states); programs were recognized as a model for the nation by the U.S. Department of Education.

- Oversaw the creation of an extensive internal library of resources and articles on grants management, laying the groundwork for a planned training academy with courses on compliance, grants monitoring, project management, Uniform Guidance, state, and Federal legislation, and more.

CHICAGO PUBLIC SCHOOLS

1995 – 2002

Inspector General (1998 – 2002)

Led staff of 50 to investigate thousands of waste, fraud, and misconduct complaints within the nation's third-largest school system.

- Restructured the agency to ensure that investigations were conducted according to the highest professional standards; zero cases were legally challenged during tenure.
- Created and oversaw a construction integrity unit and a procurement fraud investigation unit, which instituted management reviews across key operations and contracts, including construction, food and janitorial services, and informational technology.

Chief of Investigations (1995 – 1998)

Appointed by the Mayor to help turn around the city schools and acted as a key adviser and program leader. Oversaw Internal Audit Unit, as well as a \$3 million Safe Schools grant.

- Spearheaded system-wide policy and management reforms to restore integrity, promote accountability, and improve the quality of public education.
- Created a team that investigated employee integrity, with special emphasis on allegations of physical and sexual abuse of children.

ADDITIONAL LEADERSHIP

- Former Inspector General of Chicago's Public Building Commission, Member of the Cook County Board of Ethics, Commissioner of the Illinois Gaming Board, Commissioner of the University of Illinois' Admissions Review Commission, and President of the Illinois Association of Inspectors General.
- Author of two acclaimed books: *Reclaiming Our Schools, the Struggle for Chicago School Reform* (1995) and *The Joy of Job, An Investigator's Perspective on the Most Righteous Man on Earth* (2018).
- Frequent public speaker in state, national, and international forums, including the World Bank, the TIAA-CREF Annual Fraud Conference, the Association of Inspectors General, the National Association of Local Government Auditors, and the Association of Fraud Examiners, among many others.
- Frequent trainer for agencies in multiple states on grants monitoring, program design, Uniform Guidance, regulatory requirements, data analytics, fraud prevention and detection, and grants management.

EDUCATION, SELECTED PROFESSIONAL DEVELOPMENT, AND CERTIFICATIONS

Wheaton College—Bachelor of Arts, Political Science

Northwestern University, Kellogg School of Management—executive courses on People Performance, Operations Strategy, and High-Impact Sales

Numerous professional seminars, including on leadership, people management, marketing, information technology, fraud prevention and examination, security, and investigations.

Certified Inspector General

KRISTEN MOKOFISI, PHD

Director of Fiscal Oversight

Dr. Kristen Mokofisi leads the fiscal monitoring team. She manages significant Vander Weele Group^{LLC} projects, providing subject matter expertise, serving as a key contact point for clients, and ensuring exceptional grant monitoring and management. She is committed to providing the highest-quality technical assistance and guidance to clients so that grant funding can facilitate meaningful change in the communities they serve. She has a doctorate in performance psychology, enabling her to optimize each team member's strengths, communicate effectively with clients, and improve overall client success in managing complex grants.

She previously served as State Director of the Title IV-B Grant at the Nevada Department of Education, overseeing the large-scale Federal 21st Century Community Learning Centers Grant, with widespread impact at the state, local, and tribal levels. In addition to prior teaching experience, she has repeatedly supported grants, contract management, and grant research and proposals in the education and healthcare sectors.

KEY EXPERTISE: TEAM LEADERSHIP AND MENTORING | PROJECT MANAGEMENT | GRANTS MANAGEMENT AND OVERSIGHT | RELATIONSHIP BUILDING | COMMUNICATION | RISK MANAGEMENT | DATA ANALYSIS | RESEARCH | PROBLEM-SOLVING | SOFTWARE DEVELOPMENT | PROCESS MAPPING AND PROCESS IMPROVEMENT | WRITING | TRAINING | PUBLIC SPEAKING

SELECT TECHNOLOGIES: ORACLE SUITE | MS OFFICE SUITE | MS TEAMS | MS PROJECT | IWORK | BUSINESS PLUS | IVISIONS | SMARTSHEET | ZOOM | ADOBE SUITE

SECTOR EXPERIENCE: EDUCATION | HEALTHCARE | ENVIRONMENTAL PROTECTION | LABOR | PUBLIC SAFETY

EXPERIENCE

VANDER WEELE GROUP

2021 – Present

Director of Fiscal Oversight

Leads the fiscal monitoring team and manages client engagements, including two complex Illinois State Board of Education contracts (multiple grants, multiple districts), as well as labor, environmental protection, disaster recovery, and other grants in other states. Serves as point person on client and team communications; provides critical subject matter expertise.

- Plans and manages diverse engagements, provides client technical assistance, and oversees and supports team to ensure exceptional quality and timeliness of monitoring and reporting.
- Develops fiscal monitoring team, hires new team members with complementary skill sets, and organizes weekly skill-building meetings; engages each person's strengths to optimize performance.
- Steadily consolidates and enhances monitoring processes to improve efficiencies and outcomes.
- Actively supports monitoring, from high-level risk assessments, central office reviews, and template adjustments to process and internal control testing, compliance analyses, reviews of documents, budgets, and expenses, and drafting of reports and recommendations.
- Building an internal program for fiscal certification, including core training and document repository.

NEVADA DEPARTMENT OF EDUCATION

2018 – 2021

State Director, Title IV-B Grant / Programs Specialist, Office of Student and School Supports

Managed Federal allocations for multiple grants and provided grant guidance and monitoring to local education agencies to ensure the best possible academic and out-of-school program outcomes.

- Oversaw Federal Title IV-B 21st Century Community Learning Centers grant (\$10–\$12M per year) which grew to serve 135+ sites in 12 districts and affected 30,000+ children across the state.
- Provided peer-reviewed competitive award processing, grants management, and monitoring for grant subrecipients, as well as technical assistance and guidance to approximately 35 district and site-level staff.
- Played a vital role in distributing and monitoring two rounds of Emergency Relief (ESSER) funding—\$117M total—under the CARES Act, as well as \$1B in American Rescue Plan Act (ARPA) funding.
- Built and improved relationships with districts, tribes, and non-profit organizations, facilitating significant growth in applications and more than tripling the number of students served.
- Consolidated processes and streamlined forms (cutting the number of application pages in half), reducing the application burden and making the process more equitable.

WASHOE COUNTY SCHOOL DISTRICT

2015 – 2018

CHURCHILL COUNTY SCHOOL DISTRICT

2013 – 2015

Art Department Head/Title I Teacher

Served as Department Lead and Social-Emotional Learning Implementation Specialist.

- Implemented specialized curricula to meet state and district education standards for Federally funded Title I schools.
- Taught 160+ students per semester, successfully managing classrooms and differentiating instruction to varied levels of cognitive development.
- Built vital and productive relationships with students and families.
- Trained teachers in supporting underserved students and formed vital Peer Learning Communities.

RIVERVIEW CHRISTIAN ACADEMY

2009 – 2013

Art Teacher / Social Intervention Program Specialist

Taught primary and secondary students, differentiating instruction to meet individual needs. Developed curriculum, lesson plans, and conflict resolution plans. Supported grants and contract management.

Prior experience in the healthcare sector, with role that included assisting with grant research and writing, including responses to Requests for Proposals, to secure critical funding.

EDUCATION, CERTIFICATIONS, AND SELECTED PROFESSIONAL DEVELOPMENT

Grand Canyon University—Doctor of Philosophy, Psychology

University of Nevada—Master of Arts in Secondary Education

University of Nevada—Bachelor of Arts in Fine Arts

Numerous professional teaching certifications

Project Management Institute (PMI)—Introduction to Project Management (*in progress*)

SOPHIA STAVERIS, CPA, CIA, CFE

Senior Grants Accountant

Sophia Staveris is a key member of the fiscal monitoring team, bringing her extensive experience in auditing and compliance to support clients' effective grants management. Building on her multiple certifications, Sophia's career expertise is in financial and operational auditing, compliance, risk management, and investigations. Not only does she complete her monitoring and analyses in a timely and complete manner, but she also has the insight to propose optimal process improvements and policies. Sophia works collaboratively with colleagues to conduct monitoring activities, advance projects, and deliver the highest levels of accuracy and quality. She also builds productive relationships with clients, serving as a trusted partner and advisor.

KEY EXPERTISE: INTERNAL AUDITING | OPERATIONAL AUDITING | GRANTS MONITORING | COMPLIANCE PROGRAMS | RISK ASSESSMENT AND ANALYSIS | ETHICS INVESTIGATIONS AND TRAINING | PROCESS IMPROVEMENT | REPORTING | POLICIES AND PROCEDURES DEVELOPMENT | PROJECT MANAGEMENT | RELATIONSHIP BUILDING | TEAM LEADERSHIP

SELECT TECHNOLOGIES: EXCEL | WORD | POWERPOINT | PEOPLESOFT

SECTOR EXPERIENCE: EDUCATION | ENVIRONMENT | UTILITY | HOSPITALITY | MANUFACTURING

EXPERIENCE

VANDER WEELE GROUP^{LLC}

2022 – Present

Senior Grants Accountant

Serves on the fiscal monitoring team, reviewing complex client expenditures, processes, and policies to ensure alignment with grant purposes and guidelines, and facilitating effective grants management.

- Assisted in the development of a monitoring plan for the North Dakota Department of Public Instruction.
- Conducts detailed fiscal and operational reviews for Chicago Public Schools and Illinois State Board of Education contracts, focusing on allowable expenditures and identifying opportunities for process improvement.
- Supported existing clients with entering quarterly data for grant programs to the State reporting portal for the New Jersey Department of Community Affairs.
- Delivers timely and high-quality client-facing and internal materials on simultaneous projects.
- Conducts important peer reviews to ensure accurate and complete data gathering and reporting.
- Assisted with the preparation of a detailed monitoring plan for the State of New Jersey's Department of Community Affairs.

SUEZ NORTH AMERICA

2007 – 2022

Manager ERM and Corporate Compliance (2018 – 2022)

Selected to help establish a new Enterprise Risk Management and Corporate Compliance department.

- Played a key role in building the company's ERM program to identify and avert risks and develop response strategies; performed risk analyses for senior leaders.
- Developed new compliance solutions and training, as well as new policies, including charitable giving, lobbying, gifts, and conflicts of interest; administered the annual conflict of interest and gift reporting processes.
- Co-managed the company-wide training platform for ethics and compliance.

- Achieved 95% compliance with ethics training, gift reporting, and conflict of interest reporting.
- Performed reviews of compliance with Company policies and reported results to the Ethics Committee.
- Assisted in the performance of ethics investigations.
- Co-developed and promoted Ethics and Compliance Program, including frequent communications, Ethics and Compliance Day, new Compliance Champion awards, and Ethics promotional items.

Manager of Internal Audit (2010 – 2018)

Senior Auditor (2007 – 2010)

Played a key role in developing and formalizing strong financial auditing for the company.

- Developed audit programs based on a risk assessment analysis and interviews.
- Prepared detailed reports of audit findings with recommendations for improvements.
- Held audit closing meetings with management to relay audit findings and recommendations.
- Performed follow-up reviews to assess the implementation of recommendations made by Internal Audit.
- Consulted with management on the evaluation of new systems and procedures.
- Performed SOX testing and made recommendations to improve internal controls.
- Conducted investigations of ethics complaints and reported results to the Ethics Committee.
- Assisted external auditors with their year-end financial review.

LOEWS CORPORATION

1995 – 2007

Internal Audit Supervisor

Led team to perform operational and financial audits of the Corporate Office, Lorillard Tobacco, Loews Hotels, Bulova Watch, and Diamond Offshore, as well as advertising agencies used by Loews' divisions.

- Performed critical audits and evaluated internal controls of complex businesses.
- Analyzed audit results and prepared detailed audit reports with recommendations for process improvements, implementation of controls, and procedure changes.
- Planned the budget and scope of audits; prepared the Internal Audit department's annual budget.
- Supervised and trained junior staff members.
- Streamlined SOX matrices for Lorillard and performed SOX testing for Lorillard Tobacco.
- Made recommendations to Lorillard Tobacco for their buydown procedures that were implemented and significantly reduced their risks for fraud.
- Wrote the Standard Operating Procedures Manual for the Hotel Division.

Prior:

LOEWS CORPORATION, Senior Auditor, Semi-Senior Auditor, Assistant Auditor

INTERNAL REVENUE SERVICE, Internal Revenue Agent

EDUCATION AND CERTIFICATIONS

Pace University, Lubin Graduate School of Business—Master of Business Administration (MBA), Accounting

Marymount College—Bachelor of Science (BS), Math and Business, *summa cum laude*
Certified Public Accountant (CPA) in New York State
Certified Internal Auditor (CIA)
Certified Fraud Examiner (CFE)

RICHARD PALMER, CPA

Senior Grants Accountant

Richard Palmer is a key member of the fiscal monitoring team, reviewing clients' expenditures for optimal and compliant use of grant funding and helping them achieve the best possible grant outcomes. As a Certified Public Accountant and former auditor for Big 4 (PwC and Deloitte) and regional firms, he brings deep experience with single audits (testing and auditing Federal and state grants), as well as integrated audits of complex organizations in diverse sectors. In addition to his exceptional technical skills, proven accuracy and quality, and consistent timeliness, Richard is a connector and relationship builder with colleagues and clients, ensuring vital collaboration and project success.

KEY EXPERTISE: AUDITING (INCLUDING SINGLE AUDIT, FINANCIAL STATEMENT AUDIT, AND INTERNAL CONTROLS TESTING) | GRANTS MONITORING | ACCOUNTING | GAAP | COMPLIANCE | RISK ASSESSMENT | PROJECT PLANNING AND MANAGEMENT | DOCUMENTATION | WRITING & REPORTING | COMMUNICATION | STAFF OVERSIGHT

SELECT TECHNOLOGIES: ADVANCED EXCEL | AUDIT SOFTWARE (ENGAGEMENT, AURA) | TAX SOFTWARE

SECTOR EXPERIENCE: EDUCATION | HEALTHCARE | INSURANCE | NONPROFIT | MANUFACTURING | REAL ESTATE | MEDIA

EXPERIENCE

VANDER WEELE GROUP^{LLC}

2022 – Present

Senior Grants Accountant

Serves on the fiscal monitoring team, reviewing complex client expenditures to ensure alignment with grant purposes and guidelines and to support effective grants management.

- Currently leads engagement for the New Jersey Department of Education (NJ DOE) to monitor funds under the Additional or Compensatory Special Education and Related Services to Students with Disabilities (ACSERS) project. Funds were awarded under the American Rescue Plan Act (ARPA) State Fiscal Recovery Fund (SFRF). Engagement includes Program and Performance Monitoring, Financial Monitoring and Grant Management, and Anti-Fraud Monitoring for COVID-19 Recovery funds and programs specific to ACSERS. Managed the development of the Risk Assessments for NJ DOE and individual school districts, assigned staff to monitor districts and reviewed their work, led discussions between the Vander Weele Group team and NJ DOE staff, coordinated report distribution, and collaborated with NJ DOE staff regarding questions and necessary clarifications.
- Conducts detailed fiscal reviews and monitoring on large Chicago Public Schools and the Illinois State Board of Education contract (9 districts across the state), focusing on allowable compensation and non-compensation expenditures.
- Delivers timely and high-quality client-facing and internal materials on simultaneous projects.
- Provides key project support, including project planning and management, testing planning, and communication/coordination with clients.
- Delivers client-facing training on internal controls and the related guiding standards (Committee of Sponsoring Organizations, known as "COSO" and Standards for Internal Control in the Federal Government, known as "the Green Book") as well as monitoring of federal awards standards and requirements.

MARCUM, LLP

2018 – 2022

Senior Auditor (Assurance)

Performed integrated audits—internal control testing plus financial statement auditing—primarily for healthcare sector clients. Also provided project planning, risk assessment, training, and staff supervision.

- Frequently conducted single audits to ensure grant compliance with Federal guidelines regarding the allowability of costs in keeping with regulations of the U.S. General Accounting Office's (GAO) *Government Auditing Standards*, commonly called "Generally Accepted Government Auditing Standards" (GAGAS) or "The Yellow Book."
- Selected to review three years of client transactions as a critical input to legal investigation.
- Tapped repeatedly by colleagues to work with them on client projects due to expertise, timeliness, effectiveness, and ability to build strong working relationships.

MARC S PELLETTIER, CPA

2016 – 2017

Tax Accountant

Reviewed and prepared year-end financial statements for individual, partnership & S-corporation clients. Reviewed client's supporting statements/schedules, recommended reasonable changes, and processed tax returns based on complete financials.

PwC, LLP

2014 – 2016

Experienced Audit Associate (Assurance) – Contractor

Performed integrated audits of manufacturing clients' financial statements, including annual audits and quarterly financial information reviews; evaluation of internal controls over financial reporting to determine operational effectiveness as required for Sarbanes-Oxley (SOX) compliance.

COHNREZNICK, LLP

2012 – 2014

Audit Senior (Assurance)

Performed integrated audits of clients' financial statements, including annual audits, quarterly financial information reviews, and evaluation of internal controls over financial reporting. Diverse client portfolio included private and publicly listed companies in the manufacturing, real estate, software, sustainable energy, and digital media sectors. Increasingly involved in the audit planning process, which included risk assessment and staff supervision.

DELOITTE & TOUCHE LLP

2010 – 2012

Audit Senior Assistant (Assurance)

Performed integrated audits of clients' financial statements, including annual audits, quarterly financial information reviews, and evaluation of internal controls over financial reporting. Diverse portfolio included private and publicly listed companies in the manufacturing, insurance, and real estate sectors.

AETNA INSURANCE, INC.

2004 – 2009

Audit and Control Analyst (HR Service Delivery, 2005 – 2009)

Financial Reporting Analyst (Financial Accounting and Reporting, 2004 – 2005)

Assisted in creating and implementing internal controls to ensure the data integrity of Aetna's payroll system, PeopleSoft, and its sub-systems, and assisted in preparing and implementing audit plans for payroll services, with a focus on high-risk areas.

Provided information and assistance to facilitate the completion of annual financial statement audits/quarterly reviews to ensure compliance with Sarbanes-Oxley (SOX) requirements.

Completed timely and accurate monthly/quarterly reinsurance audits, which involved assessing the risk associated with the reinsurance segment.

Handled elements of the monthly financial close process, including preparing account analyses to identify unusual results, trends, and issues.

EDUCATION, CERTIFICATION, AND PROFESSIONAL AFFILIATION

University of Hartford, Barney School of Business—Master of Science in Accounting & Taxation

Beta Alpha Psi Honor Society

Eastern Connecticut State University—Bachelor of Science in Accounting

INROADS Leadership Alumni

Certified Public Accountant (CPA)

National Association of Black Accountants (NABA)—Past VW & Secretary, Greater Hartford Chapter

ARTECIA FOSTER

Grants Accountant

Artecia Foster is a highly experienced member of the fiscal monitoring team at the Vander Weele Group^{LLC}, where she has worked on significant projects for the Chicago Public Schools, the Illinois State Board of Education, the Illinois Racing Board, and the Bureau of Indian Education, among other clients. Her accounting and finance background, plus her innate analytical skills and attention to detail, enable her to deliver the highest levels of quality and accuracy, often within tight timelines. Given the depth of her experience, she resolves issues quickly, takes the initiative to expand her knowledge, and offers support and mentoring to other team members. Artecia provides invaluable technical assistance to clients as well, as they work to manage complex grants and achieve the best possible outcomes for the communities they serve.

KEY EXPERTISE: GRANTS MONITORING | ACCOUNTING | FINANCE | PROJECT MANAGEMENT | DATA ANALYSIS AND REPORTING | TECHNICAL ASSISTANCE | QUALITY CONTROL | ORGANIZATION | PROBLEM SOLVING | COLLABORATION

SELECT TECHNOLOGIES: MICROSOFT OFFICE SUITE (WORD, EXCEL, POWERPOINT, OUTLOOK, TEAMS) | QUICKBOOKS | ADOBE ACROBAT | ZOOM | ADP PAYROLL SOFTWARE

SECTOR EXPERIENCE: EDUCATION | RACING AND WAGERING | LABOR | ENVIRONMENTAL PROTECTION | TRANSPORTATION

EXPERIENCE

VANDER WEELE GROUP

2015 – Present

Grants Accountant (2018 – Present)

Monitors grants won by complex clients, reviewing their expenditures, personnel, documentation, policies, and procedures to ensure allowability and alignment with grant guidelines and to enhance overall grant outcomes. Provides technical assistance to clients and supports newer members of the fiscal team.

- Performs detailed fiscal reviews and monitoring of large Chicago Public Schools (CPS) contract and separate Illinois State Board of Education contract for 9 additional districts across the state; conducts a combination of site visits and desk reviews to assess all data and documents.
- For Chicago Public Schools:
 - Developed schedule for 53 school monitoring reviews in 2023.
 - Administered school assignments for a team of five fiscal monitors, taking into consideration monitoring experience, allotted project hours, geographic location, travel, school type, grant types received by schools, grant dollars received by schools, and other factors.
 - Facilitated the communication and scheduling of 10 onsite monitoring reviews, ensuring the success of an intricate plan to schedule two visits per day across several days for three separate two-person monitoring teams.
 - Handled travel arrangements for fiscal monitors based outside Chicago to conduct onsite monitoring reviews.
 - Facilitated training for the fiscal team in relation to CPS monitoring.
- Proactively provides technical assistance to schools, helping them continuously improve and streamline their documentation, coding, and processes, and adhere to best practices.
- Assists in conducting risk assessments for CPS to determine monitoring priorities.

- During leadership transition, effectively managed/completed projects for the Illinois Racing Board (IRB).
- Reviewed IRB grantee's financial and performance reports, general ledgers, and support documentation; tested expenditures to verify allowability; analyzed spending and recommended budget amendments to offset future deficits; provided guidance on grant spending and management.
- Executes monitoring reviews for New Jersey state agencies receiving CARES Act funding; tests applications, support documents, and other data to ensure compliance with laws and guidelines.
- Researches and conducts site visits to verify all subcontractors for major Chicago O'Hare contract.
- Trains and supports new teammates to facilitate their successful onboarding and project impact.

Finance and Human Resources Associate (2015 – 2019)

Hired to manage and improve key financial and human resources functions for the firm.

- Researched, discovered, and implemented enterprise finance software—Unanet—to streamline time and expense tracking; migrated key data from ADP; the system is still in place, offering the firm a better way to record time and payments, as well as track and view finances in real time.
- Oversaw the firm's finance policies, ensuring compliance with ever-changing city, county, state, and Federal mandates.
- Performed regular audits of financial records and examined/verified documents to ensure completeness and accuracy in accordance with accounting procedures.
- Monitored and completed WBENC, WBE, DBE, WOSB, and HUBZone certifications and licenses to ensure compliance with Federal and state laws and regulations.

CITY COLLEGES OF CHICAGO, DISTRICT OFFICE

2015

Assistant Accountant

- Thoroughly evaluated accounts to ensure that balances corresponded with the general ledger, identifying any variances, and analyzing them to confirm their appropriateness.
- Prepared a schedule of daily cash reports for all 7 City Colleges and their business entities.
- Reviewed the organization's investments and adjusted market values and maturity dates.
- Created and posted journal entries using PeopleSoft.
- Assisted with the preparation of bank reconciliations.
- Handled asset disposition recording all asset costs and acquisition dates.
- Assisted with the preparation of the Comprehensive Annual Financial Report (for the Fiscal Year ending June 30, 2015).

EDUCATION

Roosevelt University—Bachelor of Science in Business Administration, Accounting Major

Extensive relevant coursework in Accounting, Auditing, Tax, and Finance

Harold Washington College—Associate of Arts, Accounting Major

CASSY GOOD

Fiscal Monitor/Research Associate

Cassy Good is a Fiscal Monitor/ Research Associate. Cassy has an extensive background in working with various levels of government, researching legislation, performing compliance monitoring, and acting as a liaison in a range of circumstances.

KEY EXPERTISE: WORKING IN AND WITH LOCAL, STATE, AND FEDERAL GOVERNMENT | GRANT AND CONTRACT MONITORING | ACCOUNTING | BUDGETING | DATA COLLECTION | CONTRACTING AND PROCUREMENT | COMPLIANCE | DOCUMENTATION AND REPORT WRITING | LEGISLATIVE RESEARCH

SECTOR EXPERIENCE: GOVERNMENT | EDUCATION

EXPERIENCE

VANDER WEELE GROUP^{LLC}

2023 – Present

Fiscal Monitor/ Research Associate

Cassy assists with fiscal reviews and other grant monitoring support on diverse projects. Her tasks include:

- Developing a Standard Operating Procedure for the New Jersey Department of Community Affairs' Quarterly Procurement Report.
- Developing blog articles addressing monitoring as a general topic and monitoring of grants associated with the Infrastructure Investment and Jobs Act.
- Performing site visits and desk reviews at selected Chicago Public Schools.
- Helping select subcontractors to be reviewed for the Chicago O'Hare International Airport project, for which the Vander Weele Group serves as a subcontractor monitoring minority- and women-owned businesses. Researching the selected subcontractor for licensure, potential liens, court documents, and online reviews. Performing the site visit and writing the complete report.
- Helping create grant agreements and Memoranda of Understanding for the New Jersey Department of Community Affairs to ascertain the consistency of information in three software platforms; developing monthly and quarterly reports; and uploading data to the U.S. Department of the Treasury reporting portal.
- Providing ongoing legislative research.
- Developing Compliance Matrices, including research to ensure proper citations of legal authorities.
- Developing a Business Enterprise Program policy for the Illinois Racing Board, including an official legislative summary, policy draft, goal waiver request form, call log, and other documents.

ILLINOIS STATE BOARD OF EDUCATION

2022 - 2023

Fiscal Support Services

In her work for the Illinois State Board of Education, Cassy:

- Updated and maintained contract tracking and procurement systems.
- Negotiated, monitored, and created vendor contracts.
- Tracked receipt of post-performance reviews.
- Every month, reported Business Enterprise Program (BEP) spending, veteran's spending, and small business set-aside spending.

- Responded to Freedom of Information (FOIA) requests.
- Assisted in the Education Purchasing Program.
- Assisted with Expenditure Review scheduling and preparation.
- Assisted in contract evaluator meetings.

ILLINOIS MUNICIPAL LEAGUE

2020-2021

Legislative Liaison

On behalf of the Illinois Municipal League (IML):

- Advocated on behalf of the 1,296 municipalities in the State of Illinois.
- Acted as a liaison between local officials, state legislators, and state agencies and worked closely with legislators during legislative negotiations.
- Researched over 8,000 legislative bills filed and actively tracked and took a position on 1,200 of those bills.
- Created and edited position papers, fact sheets, publications, proposed bill language, and official agency advocacy documents.
- Maintained the IML Legislative and Legal web pages.
- Attended legislative committee meetings.
- Hosted a variety of meetings including the IML Annual Conference, monthly IML Legislative Committee meetings, monthly IML Manager Committee meetings, and monthly state agency liaison meetings.
- Interpreted rules, regulations, laws, and policies.
- Created and filmed presentations.

ILLINOIS COMMUNITY COLLEGE BOARD

2019 - 2020

Associate Director for Financial Compliance

On behalf of the Illinois Community College Board (ICCB):

- Ensured compliance for approximately 250 grantees for the community college system within the State of Illinois.
- Coordinated and conducted site visits, desk audits, and risk-based fiscal monitoring of grant programs statewide.
- Developed, maintained, and updated monitoring instruments of state and Federal law.
- Analyzed and compiled data and findings into final reports in coordination with other ICCB divisions.
- Restructured the monitoring process.
- Collected and inputted all community college annual budgets and audits.
- Assisted with the community college recognition process.
- Gained experience with and attended meetings on the Grant Accountability and Transparency Act (GATA).
- Acted as BEP Liaison between the BEP Council and the ICC Purchasing Consortium and all public community colleges in the State of Illinois.
- Ensured businesses/vendors owned by minorities, women, and persons with disabilities were represented in community college procurement.

- Recreated the BEP Compliance Plan structure to better fit community college accounting systems.
- Compiled the annual Spend Reports from each community college to be submitted to CMS at the end of the calendar year to ensure BEP requirements were met.
- Acted as 2020 CENSUS Liaison to all public community colleges and the Governor's office.

EDUCATION

Ashford University—Bachelor of Business Administration

University of Illinois—Master of Public Administration

BIANCA JOSEPH

Vander Weele Group^{LLC} Senior Fiscal Monitor

Senior Fiscal Monitor Bianca Joseph reviews complex client expenditures to ensure alignment with grant purposes and guidelines and to support effective grants administration. Bianca delivers timely and high-quality client and internal materials on simultaneous projects and provides key project support, including project planning and management, testing, and communication/coordination with clients. Earlier, while working for the City of New Orleans Office of Community Development, she provided grant management and monitoring as the city rebuilt after Hurricane Katrina. She also provided financial technical assistance for redevelopment, construction, transit, rental assistance, and comprehensive planning and infrastructure projects.

KEY EXPERTISE: FINANCIAL ANALYSIS & REPORTING | BUDGETING, FORECASTING, AND COST CONTROL | GRANTS MANAGEMENT AND OVERSIGHT | CONTRACTS AND GRANTS REVIEW | STATE, FEDERAL, AND OMB GRANT REGULATIONS | FINANCIAL AUDITS, FINDINGS, AND TECHNICAL ASSISTANCE

SECTOR EXPERIENCE: GOVERNMENT | COMMUNITY DEVELOPMENT | EMERGENCY RENTAL ASSISTANCE | TRANSPORTATION | INSURANCE | CRIMINAL JUSTICE | TRANSPORTATION | LABOR AND ECONOMIC DEVELOPMENT

EXPERIENCE

VANDER WEELE GROUP

2023

Senior Grants Accountant

Bianca joined the Vander Weele Group in 2023 as a Senior Grants Accountant. In her role, she serves on the fiscal monitoring team, reviewing complex client expenditures to ensure alignment with grant purposes and guidelines and to support effective grants management. Among her responsibilities, she:

- Supports compliance monitoring initiatives and performs compliance reviews.
- Tests to ensure sufficient internal controls are in place to comply with Federal and State statutes, regulations, rules, grant agreements, and procedures.
- Provides oversight to programs serving vulnerable populations.
- Analyze grant submissions, revisions, and related budgets to ensure adherence to Federal and State regulations.
- Test processes and internal controls to verify practices are in place to ensure compliance.
- Sample and review expense reimbursements for equipment, supplies, and personnel to ensure compliance with laws, regulations, and established guidelines.
- Draft recommendations and reports to summarize testing and findings and ensure that required reports are submitted per project requirements.
- Ensure that appropriate actions are implemented to resolve past deficiencies in auditing or monitoring reviews.
- Conducts detailed fiscal reviews and monitoring on large contracts, focusing on allowable compensation and non-compensation expenditures.
- Delivers timely and high-quality client-facing and internal materials on simultaneous projects.
- Provides key project support, including project planning and management, testing planning, and communication/coordination with clients.

CITY OF NEW ORLEANS, OFFICE OF COMMUNITY DEVELOPMENT
Transportation Operations Accountant

2009 – 2012

- Examined grantees' accounting practices related to the expenditure of agency grant funds and grantee matching funds.
- Served as point of contact for the creation of financial reporting, financial analysis, month-end closeouts, and internal controls for non-profit grantees that required technical support.
- Conducted variance analysis comparing actual and desired results to identify inefficiencies and areas for improvement for the grant budget.
- Created budgets, financial analysis, financial models, and financial reports for grants.
- Oversaw accuracy of cost-control statements, general ledgers, trial balances, reconciliations, cost allocations, invoices, budget, payroll, program income, ad-hoc, payroll, accounts receivables and payables, journal entries, accruals and contracts for each project to prepare comprehensive reports for grantees.
- Managed and Conducted all Duplication of Benefits audits for the department totaling approximately \$1B annually.
- Ensured all terms and conditions of the grantee's contract were compliant, including documentation and deliverables provided by the sub-recipient.
- Conducted complex financial audits of sub-recipients to verify compliant transactions against GAAP, federal, state, and OMB regulations.
- Managed financial software system to access and manipulate suppliers' financial data.
- Completed comprehensive written audit reports that included findings, concerns, and comments for each assigned project.
- Schedule and hosted entrance/exit evaluations with each grantee to disclose findings and provide recommendations.
- Reviewed capital projects related to debt limitations statutes, ordinances, and regulations.
- Provided financial technical assistance for projects, such as redevelopment, construction, transit, rental assistance, comprehensive planning, infrastructure, payroll, financial planning, and taxation projects
- Assisted grantees with business strategies, coding, balance sheets, income statements, processing invoices, purchase orders, payments, maintaining vendor records, tax filings, financial policies and procedures, and payment processing.
- Finalized closeouts for each project.
- Conducted merit reviews for grant applications for the Office of Community Development.
- Used a score sheet and followed prescribed steps to review applications.

Emergency Rental Assistance Program (ERAP) Grant Specialist

2012 – 2023

- Reviewed, evaluated, and processed applications submitted for rental and utility payments using an online platform while adhering to the program's guidelines.
- Determined eligibility, months of assistance, and funding amounts for applicants seeking assistance.
- Utilized ERAP grant regulations and adhered to confidentiality standards.

Notable accomplishment: Identified a project's audit finding, which secured savings for the City of New Orleans in the amount of \$4 million.

RECOVERY SCHOOL DISTRICT

2012 – 2023

Transportation Operations Accountant

- Prepared reports of financial data including vendor billing, invoices, all grant-related extracurricular activities, and transportation accounts for government reimbursement.
- Performed month-end functions, such as completing monthly billing, sales tax reports, and bank reconciliations.
- Created and posted all necessary journal entries ensuring sufficient and accurate accounting records.
- Processed accounts payable, matched invoices to requisition/purchase orders, and verified general ledger coding.
 - Prepared general ledger closing entries (monthly and annually), and prepared year-end accruals and monthly revenue reports.
- Executed accounting operations and prepared budgets and forecasts.
- Reviewed and reconciled invoice discrepancies.
 - Completed analytic projects, prepares reports, and performs financial analysis by completing related duties as assigned, including audit and cost reporting schedules.
- Assisted with supervising the Customer Service Team

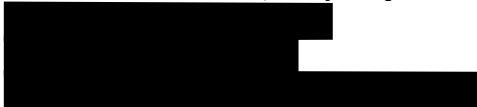
Notable accomplishment: Successfully researched and recovered a total of \$10 million in grant money from FEMA for the Recovery School Districts' modular sites. The Transportation Department was unaware that this money was available to the company.

EDUCATION, SELECTED PROFESSIONAL DEVELOPMENT, AND CERTIFICATIONS

University of New Orleans—Bachelor of Science, Accounting

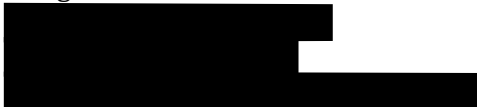
IX. PREVIOUS AND CURRENT CUSTOMERS/ PAST PERFORMANCE

Client: State of New Jersey, Department of Education



Project Description: Beginning in fall 2022, the New Jersey Department of Education engaged the Vander Weele Group to aid in the monitoring of \$600 million for services provided to students with disabilities under the Additional or Compensatory Special Education and Related Services (ACSERS) program, which is funded through the ARPA State and Local Fiscal Recovery Fund (SLFRF). Our team performed a single-entity risk assessment for the Department of Education as a whole, and then comparative risk assessments to prioritize individual districts for monitoring.

Client: State of New Jersey, Department of Community Affairs, Division of Disaster Recovery and Mitigation



Project Description: The Vander Weele Group is engaged through December 2023 to assist the New Jersey Department of Community Affairs, Division of Disaster Recovery Management in managing \$6.2 billion of grant funds provided to 28 state agencies for 103 programs. Our team is documenting the Division's entire range of business processes, including developing Standard Operating Procedures and creating business process maps, for the grant review process for Coronavirus State and Local Fiscal Recovery Funds (SLFRF) and the Capital Projects Fund (CPF). From beginning to end, we have supported the grants management process—from grant applications and developing Memoranda of Understanding with sub-recipients through final submissions of monthly Performance Reports and submission of the Quarterly Performance Report to the U.S. Department of the Treasury portal. Programs include broadband, state police, various children, family and social services, infrastructure, various housing support programs, K-12 and higher education, healthcare, labor, tourism, economic revitalization, and veteran services, among others

Client: State of New Jersey, Department of Labor and Workforce Development



Project Description: In December 2021, the Vander Weele Group was engaged by the New Jersey Department of Labor and Workforce Development (NJDOLE) to support the implementation of risk assessments and policy creation to aid the NJDOLE through the CARES Act. The CARES Act created three new unemployment insurance benefit programs, which were implemented and managed by the Unemployment Division of the NJDOLE. The Vander Weele Group, with subcontractor DeLuca Advisory Services, supported the implementation of risk assessments and a Fraud Prevention and Detection Policy to aid the monitoring of \$5.6 billion expended through the Pandemic Unemployment Assistance (PUA), \$9 billion expended through the Federal Pandemic Unemployment Compensation (FPUC), and \$3.8 billion expended through the Pandemic Emergency Unemployment Compensation (PEUC).

Client: State of New Jersey, Department of the Treasury, Division of Pension and Benefits



[REDACTED]

Project Description: Following a Memorandum of Understanding (MOU) between the New Jersey Department of the Treasury and the New Jersey Division of Pensions and Benefits (NJDPB), the Vander Wee Group was engaged to provide a department-wide risk assessment, recommendations, and procedures to aid in the monitoring of \$146.2 million in increased claims to NJDPB resulting from the COVID-19 pandemic. The NJDPB, on behalf of the State Health Benefits Program and the School Employees' Health Benefits Plan, contracted with a third-party medical vendor, Horizon Blue Cross of New Jersey, to process and reconcile the claims with an independent vendor, Health Management Systems. The Vander Wee Group, with subcontractor DeLuca Advisory Services, supported the creation of a Report of Prioritized Recommendations, risk assessment of integrity oversight, and Sampling and Monitoring Procedures to support this MOU.

Client: State of New Jersey, Department of Environmental Protection

[REDACTED]

Project Description: In December 2021, the Vander Wee Group was engaged by the state of New Jersey to monitor funds allocated to the New Jersey Department of Environmental Protection (NJDEP) to be awarded during two rounds of sub-awards for \$11.2 million (Round 1) and \$9.4 million (Round 2) with the Atlantic States Marine Fisheries Commission (ASMFC). The Vander Wee Group, with subcontractor DeLuca Advisory Services, provided monitoring and created a risk assessment to support the monitoring of these funds.

In a 2023 notice to the DEP's Deputy Commissioner, the New Jersey Office of the State Comptroller--which had conducted its own integrity investigation before engaging the Vander Wee Group--praised the team's report, which "reached substantially similar conclusions" as its own. Collectively, the Vander Wee Group and NJOSC identified the following key findings:

- At least 41 percent of program payments disbursed to applicants, or a total of \$5.9 million, are subject to possible recoupment due to overpayment or ineligibility, and
- The team thoroughly reviewed NJDEP's financial, application, and administrative processes for all components of the \$14.4 million program. Thirty-four% of applicants reviewed failed to provide complete documentation to support their awards when requested, subjecting an additional \$1.1 million in relief payments to potential recoupment.

In total, more than \$7 million (roughly 49%) of Marine Fisheries program relief payments were found to be potentially subject to recoupment.

Client: State of New Jersey, Redevelopment Authority

[REDACTED]

Project Description: The Vander Wee Group was engaged by the New Jersey Redevelopment Authority (NJRA) to aid the monitoring of \$25.5 million Coronavirus Relief Funds (CRF) to provide eligible businesses and property owners in NJRA-eligible communities grant awards toward monthly lease obligations under the Small Business Lease-Emergency Assistance Grant Program.

Client: State of New Jersey, Board of Public Utilities

[REDACTED]

Project Description: The Vander Weele Group is aiding the New Jersey Board of Public Utilities (NJ BPU) in the monitoring of \$180 million in grants to improve air quality and energy performance in schools and small businesses. Specifically, the COVID-19 pandemic brought to light the need for improvements in plumbing and heating, ventilation, and air-conditioning systems in schools. The Vander Weele Group is performing a comparative risk assessment to help determine which grantees should be monitored. The programs are funded through the ARPA State and Local Fiscal Recovery Fund (SLFRF).

Client: North Dakota Department of Public Instruction

Contact: Rebecca Pollert

Project Description: For this engagement, the Vander Weele Group is creating and supporting the implementation of a large-scale comprehensive monitoring plan to be utilized for over 30 Federal and state discretionary, formula, and entitlement grants across the North Dakota Department of Public Instruction. This includes the development of a risk assessment process, templates for grantee communications, fiscal and programmatic monitoring tools, as well as quality control processes.

Client: Public Building Commission of Chicago

Contact: Admiral Samuel Sax

Project Description: The Vander Weele Group served as the outsourced Inspector General of the Public Building Commission of Chicago (PBC), an agency that builds or renovates hundreds of schools, city colleges, libraries, parks, firehouses, police stations, and other facilities for the City of Chicago, Cook County, the Chicago Public Library, the Chicago Public Schools, the Chicago Park District and the City Colleges of Chicago. The Vander Weele Group investigated waste, fraud, and abuse and made recommendations for systemic change. Additionally, our team conducted forensic audits as necessary for investigations into potential fraud, waste, mismanagement, or misconduct.

We consulted with the Board and Executive Director to provide information obtained by the Inspector General that may have affected decisions regarding the Commission's programs and activities. If findings were deemed to be appropriate for referral, they were referred to appropriate Federal, state, and local law-enforcement agencies. Among the investigations were allegations such as MBE/WBE fraud within public works construction companies. The engagement team evaluated internal processes and recommended operational improvements, resulting in \$1 million in actual recoveries. Additionally, millions of dollars in potential recoveries were also identified, and the PBC contract compliance system was completely overhauled.

As part of our work for the Public Building Commission, the Vander Weele Group authored a study on detecting, investigating, and documenting small business fraud. It evaluated dozens of small businesses for indications of pass-through fraud or non-compliance with the "commercially useful" function requirement. We interviewed complainants and targets, analyzed commercial agreements, analyzed and prepared as evidence thousands of financial records, reviewed electronic evidence, and memorialized formal investigation findings in extensive, thoroughly documented reports.

Although then-mayor Rahm Emanuel "in-sourced" the function to the Inspector General of Chicago, based on a campaign pledge, he opined that the Vander Weele Group's work was excellent and, in

fact, “perfect.” As a subcontractor on a separate project, the firm is currently an Integrity Monitor for the O’Hare Airport Modernization Program.

Client: Illinois State Board of Education, Division of Federal and State Monitoring

Contact: Kristopher R. Pickford, Director

[REDACTED]

Project Description: This engagement began in May 2018 when the Illinois State Board of Education (ISBE) engaged the Vander Weele Group to create and execute a risk-based program to provide technical assistance and monitor the expenditure of Federal Grants distributed by ISBE to Chicago Public Schools (CPS) District 299. Our team reviews policies and procedures, district-wide documentation, and coding and categorization support that is provided to individual schools and Central Office units to ensure they comply with *Title 2 U.S. Code of Federal Regulations, § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (“the Uniform Guidance”) and any other requirements of individual grant funds. If deficiencies are uncovered, we provide technical assistance and recommendations on how the problem can be remedied to avoid future findings. For individual schools, we review, for example, time and effort documentation, ensuring that staff employed under these grants are properly documented as working under the position for which they are paid. Similarly, when deficiencies are found, we assist staff in understanding how to comply with Federal, state, and district requirements to prevent a recurrence of the finding.

Additionally, from 2018 through 2022, CPS received \$3.6 billion in Federal grants under review. From FY18 to FY22, our team completed in-depth expenditure monitoring of \$620.3 million in grants expended at Chicago Public Schools for elementary, secondary, 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, based on a large-scale comparative risk assessment, identified schools and Central Office units to be monitored. We are currently monitoring 40 district-operated schools and 11 charter schools funded through CPS. In fiscal year 2022, our team conducted 60 fiscal reviews of schools and two Central Offices. Our team created fiscal monitoring tools to gauge compliance with grant requirements, including but not limited to the Uniform Guidance, the *American Rescue Plan Act* (ARPA), the *Coronavirus Aid, Relief, and Economic Security* (CARES) Act, the *Coronavirus Response and Relief Supplemental Appropriations* (CRRSA) Act, and multiple education-related statutes. Examples of testing include gauging the allowability of costs, 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 and again in 2023, the State awarded our firm additional three-year contracts to monitor nine of the State’s other large districts in a manner similar to the CPS engagement.

Client: Illinois Racing Board

Contact: Vitto Ezeji-Okoye

[REDACTED]

Project Description: Since 2018, the Vander Weele Group 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.

In 2023, the Illinois Racing Board (IRB) engaged the Vander Weele Group to assist in enhancing its Record Retention Program to support compliance with the State Records Act (ILCS 160/18), which requires the Board's Executive Director to submit lists or schedules of records with a proposed retention period for each series. The Vander Weele Group's Engagement Team is working with IRB staff to establish classes of records (e.g., Finance, Legal, Corporate Governance, and so forth) retained in each department. Within these classes, the team is identifying classes of records kept, such as legal contracts, procurement contracts, financial documents (checks, invoices, purchase orders, receipts, bank statements, audits, and bank reconciliations), correspondence, Board meeting minutes, appointment letters, investigation letters, and so forth. We are documenting where and where and how each type is stored, and whether the documents are in paper or electronic format. For electronic documents, we are recording what platform and server are used for retention. Finally, the Vander Weele Group is working collaboratively with IRB Counsel to discuss retention and destruction schedules for each type of document and assist in updating the IRB's record retention policy.

Additionally, the Vander Weele Group is assisting the IRB in complying with the *Illinois Racing Act of 1975* for contracting by licensees to Minority-Owned Business Enterprises (MBE), Women-Owned Business Enterprises (WBE), and Business Owned by Persons with Disabilities (DBE). Our team created a list of businesses interested in performing work for Illinois Racetracks by surveying MBEs, WBEs, and DBEs and notifying them of each licensee's required goals. We reached out to small business organizations and re-notified Racing Track representatives of their obligation to meet the specified contracting goals and provided them with lists of interested businesses.

Client: 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

Project Description: In September 2011, the Vander Weele Group was engaged by the Bureau of Indian Education (BIE) to monitor 183 schools in 22 states for compliance with the No Child Left Behind Act (NCLB) and the Individuals with Disabilities Education Act (IDEA). At the beginning of the engagement, we created a school self-assessment tool, a monitoring tool, a standardized report format, and other materials. We completed the first year's 38 compliance reviews in two months. During site visits, Monitors reviewed further documentation, interviewed 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

"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."

education to children. By the end of the engagement, we completed 142 site visits and multiple desk monitoring reviews. After each school visit, Monitors completed complex reports thoroughly detailing a school's compliance with NCLB and containing narratives explaining the school's strengths and weaknesses. This information 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.

Also, on behalf of the Bureau of Indian Education, the Vander Weele Group:

- Developed training on the *Every Student Succeeds* Act of 2015, School Board Roles and Responsibilities, Board Oversight, Ethics, Using School Data, Facilities, Roberts' Rules of Order, Administrative Cost Grants, Emergency Planning, and more.
- Developed extensive training on conducting fiscal and educational reviews of schools.
- Designed monitoring tools and related materials for fiscal, Special Education, and other reviews.
- Developed policies and forms for security, substance abuse, suicide prevention, sexual harassment, search and seizure, drug and alcohol testing, anti-bullying, zero tolerance for weapons, and more.
- Organized a Safe Schools Symposium, featuring 29 speakers and drawing 288 attendees.
- Developed programs to address alcohol abuse and suicides among Native American youth. They included student-developed videos addressing this important topic.
- Developed Substance Abuse Prevention: Best Practices Resource Guide for Educators and a 112-page manual on Safe Schools Planning. We developed a Parents' Guide to Mental Health, Student Health Guidelines, sample Memoranda of Understanding, Student Codes of Conduct, job descriptions, and nearly 20 forms ranging from Lost or Stolen Equipment Reports to School Entrance Health Forms.

Additionally, the Vander Weele Group created multiple internal project websites and a website to provide technical assistance to schools and help them become compliant. During their travels, our Monitors collected a variety of sample documents that exhibited best practices, and we posted these, as well as online resources, on the website