

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

Firm Name: Navigant Consulting Inc.
 Engagement: EQ2014-002-P3-DCA Sandy Contracts
 For Quarter Ending: 6/30/2015

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

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

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5.	Award Amount	Gilbane (RREM): \$58,900,851; Gilbane (LRRP): \$10,005,234 CB&I/Shaw: \$83,144,838 CGI: \$65,698,399 ICF: \$67,558,670 URS: \$20,096,853 HGI: \$67,739,989 Cohn Reznick: \$9,992,683	
6.	Contract/Program Person/Title	RREM and LRRP: Stephen Grady, Assistant Director, Housing Recovery Programs, DCA SIROMS and Sandy Grant Manager Module ("SGM"): Linda Torres, Contract Manager, DCA Information Technology Director ICF: Elizabeth Mackay, Assistant Division Director, DCA Sandy Recovery Division Cohn Reznick: Robert Bartolone, Director, Office of Auditing, DCA	

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

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9.	Amount Expended to Date	Amounts are based on current invoice totals as of June 30, 2015: Gilbane (RREM): \$29,915,778; Gilbane (LRRP): \$5,690,680 CB&I/Shaw: \$24,157,923 CGI Federal: \$34,544,867 ICF: \$33,778,040 URS: \$5,543,381 HGI: \$35,910,449 Cohn Reznick: \$7,863,540	
10.	Amount Provided to other State or Local Entities	N/A	
11.	Completion Status of Contract or Program	Completion Status based on contract values and invoiced amounts as of June 30, 2015: RREM (Gilbane/CB&I Shaw/URS): approximately 37% LRRP (Gilbane): approximately 57% SIROMS/SGM (CGI): approximately 53% ICF: approximately 50% Cohn Reznick: approximately 89%	
12.	Expected Contract End Date/Time Period	RREM (Gilbane & CB&I Shaw): May 22, 2017 LRRP (Gilbane): September 30, 2015 CGI: May 24, 2016 ICF: May 24, 2016 Cohn Reznick: June 30, 2015	

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13.	If FEMA funded, brief description of the status of the project worksheet and its support.	N/A	
14.	Quarterly Activities/Project Description (include number of visits to meet with recipient and sub recipient, including who you met with, and any site visits warranted to where work was completed)	<p>Navigant's integrity oversight monitoring activity for the Second Quarter 2015 focused principally on four areas: reviewing the invoices of the two RREM Contractors, Gilbane and CB&I ("the Contractors"), and their numerous subcontractors; attending and observing homeowner and Contractor meetings and inspections, providing feedback to DCA and the Contractors; and continuing our comprehensive technical electronic analyses of RREM application data to identify potentially problematic files for further review. During this quarter, we conducted 15 meetings with DCA, Treasury, Cohn Reznick, CB&I, Gilbane, Housing Center staff and RREM applicants.</p>	
		<p>A. Invoice Review:</p> <p>Throughout the Quarter, we continued our review of the RREM and LRRP Contractor invoices and their respective subcontractor invoices and are in the process of continuing three targeted reviews of certain billings as follows:</p> <p>(1) Follow up with CBI/Shaw to obtain and review the supporting documentation for the time and material invoices submitted by one of its hazmat subcontractors.</p> <p>(2) Update our invoice database to compile relevant invoice details for further analysis to include comparing and reconciling contractor purchase order amounts and certain subcontractor invoices; and</p> <p>(3) Follow up with Gilbane to obtain and review the supporting documentation for the time and material invoices submitted by one of its hazmat subcontractors.</p>	

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		<p>Navigant reported in the prior Quarter's report that a CBI/Shaw hazmat subcontractor submitted billings on a time and materials basis totaling \$1.94 million. These billings were for 727 hazmat inspections (447 asbestos and 280 lead inspections). We followed up with the Contractor and presented our findings and observations to DCA regarding the accuracy, adequacy and appropriateness of the supporting documentation.</p> <p>In response to our supplemental document request, the Contractor informed Navigant that their delayed production of supporting documentation was caused by delays encountered by the subcontractor that could not immediately handle and respond to the scope and quantity of documentation requested due to it being a relatively small contractor. During the quarter, the Contractor provided Navigant supporting documentation for a portion of the subcontractor's invoices, which included the subcontractor's inspectors' timesheets and an excerpt from an invoice summary that the subcontractor maintained. We reviewed the timesheets and identified discrepancies between the hours reflected in certain timesheets and the hours reflected in the subcontractor's associated invoices.</p>	
		<p>DCA concurred with Navigant's findings regarding the subcontractor's billing issues. Pursuant to our findings, DCA worked collaboratively with Navigant to obtain the supporting documents for the time and material invoices in question. As a result, CBI/Shaw advised that the subcontractor will submit revised invoices to the Contractor. Consequently, CBI/Shaw will issue revised invoices to the DCA for Navigant's review. During the next Quarter, Navigant will obtain and review the revised invoices to validate and test for accuracy and appropriateness.</p>	

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		<p>During the Quarter, we continued with our ongoing review of Gilbane's hazmat subcontractors' invoices and updated our invoice database with additional key data that is being utilized for our analysis. Our review noted that the details contained in the different hazmat subcontractor invoices are inconsistent and vary between each of the different subcontractors. When Navigant is provided with the additional underlying supporting documentation requested from the Contractors, we will incorporate this information into our invoice database to assist with our analysis and determine whether there are any potential billings that are not accurate or properly supported.</p> <p>During our ongoing review of Gilbane's hazmat subcontractors, we identified subcontractor invoices that included some unsupported amounts that were billed on a time and materials basis. These subcontractor billings included charges for the preparation of cost estimates to abate asbestos and lead in certain homes. We have requested that Gilbane obtain additional documentation from the subcontractor to support the invoiced costs billed on a time and material basis, as well as the missing detail invoice pages. When we receive the additional documentation and information, we will quantify the nature and extent of such billings and determine whether the invoiced costs are accurate and properly supported.</p>	
		<p>Navigant will continue our ongoing review of Gilbane subcontractor invoices to identify any pricing that is inconsistent with the Gilbane's purchase orders and/or contracts with their subcontractors. We will also continue to track and summarize these potential discrepancies, and follow up with Gilbane to obtain any amendments or updates to the existing subcontractors' contractual documents to supplement or supersede, if applicable, information that Gilbane have provided to us to date. When we receive all of the additional documentation, we will determine if the invoices are consistent with the contract terms, are accurate and properly supported.</p>	

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No.	Recipient Data Elements	Response	Comments
		<p>Navigant will continue to request and review new invoices produced by the Contractors on a recurring basis, and will update our Contractor and Subcontractor invoice database to compile relevant invoice details for further analysis. This database will enable us to verify the mathematical accuracy of invoiced amounts, validate the invoiced unit rates, identify any second-tier subcontractors, track the amount of the subcontractors' billings to date, and track total amounts billed by subcontractors to the terms of their subcontractor agreements or purchase orders. It will also enable us to conduct additional invoice analytics based on the RREM and LRRP application numbers, other key information and underlying source documents.</p>	
		<p>B. Meetings and Inspections:</p> <p>During the Quarter, we reviewed relevant documentation available on SIROMS, conducted site visits and attended five (5) meetings with RREM applicants and various RREM Program representatives, which included housing advisors, Contractors, homeowners and homeowner selected builders/lifters. The meetings consisted of 5A Meetings, 5A Follow Up Meetings (requested by the homeowners) and a Final Inspection. The meetings were organized and consistent across the two different RREM Contractors. The documentation provided and/or reviewed at the meetings was consistent and included the most current documentation available on SIROMS. A consistent and clear message was delivered by both Contractors, with owners affirmatively indicating they understood the information and directions being provided.</p> <p>Prior to attending the meetings we reviewed each applicant's current workflow status and supporting documentation available within SIROMS, including the Grant Award Calculation ("GAC"), Work-in-Place Estimates ("WIP"), Estimated Cost to Repair ("ECR") and Reimbursement Requests, among other documents. It was determined that there were no inconsistencies between SIROMS and the documents presented and reviewed in the meetings. The meetings were held at multiple locations, including the applicant's damaged home, and the Housing Recovery Centers ("HRC") located within each county.</p>	

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		<p>The 5A meetings included the applicant and a Contractor’s representative, and focused on the documentation required to transition the applicant from the grant award phase to the construction phase of the RREM program. During each meeting, the Contractor’s representative ensured that each applicant had an opportunity to review the GAC, WIP and ECR prior to the meeting. The Contractor’s representative briefly described the paperwork, allowed for the applicant to ask any questions about the program and paperwork, and the applicant signed the required documents.</p> <p>For the Final Inspection, the Contractor walked through the completion punchlist with the homeowner and signed off on the applicable documentation. Despite being the final inspection, there were a few items that still required closure prior to formally releasing the remaining funds, including the updated Certificate of Occupancy and Elevation Certification. Before being able to formally close the file, the Contractor communicated with the Homeowner that all documentation must be completed and filed.</p> <p>In the previous quarter there was a concern over 1) pre-signing of documents and 2) ECRs including previously completed work. In attendance at these meetings, particular attention was given for those issues and it was noted that the prior issues were appropriately addressed.</p>	
		<p>C. Technical Electronic Analyses: During the Quarter, Navigant continued our comprehensive technical analyses to identify potentially problematic RREM applications for further review.</p>	

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		<p>Navigant completed our first analysis. This analysis was a targeted review and analysis of RREM applications reflecting unexpected responses to specific questions in the original intake application relating to preliminary program eligibility. Specifically, Navigant sought to identify RREM applications in which:</p> <p>(1) The applicant responded “no” or provided no answer within the intake application to the question: Was the property damaged by Superstorm Sandy?</p> <p>(2) The applicant responded “yes” or provided no answer within the intake application to the question: Has the property been foreclosed?</p> <p>(3) The applicant responded “no” or provided no answer within the intake application to the question: Did you register for FEMA for assistance for damage caused by Superstorm Sandy?</p> <p>(4) The applicant responded “no” or provided no answer within the intake application to the question: Was your total household income less than \$250,000 at the time of the storm?</p>	

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		<p>The first analysis was conducted using a multi-phased approach involving a review of 230 funded or waitlisted RREM applications in which at least one unexpected response to the questions listed above was present, reflecting the existence of a potential eligibility issue for the application at the intake stage. Our analysis was designed to evaluate how the program tracked the application, addressed and resolved the potential eligibility issues, and the adequacy of existing controls in place by the DCA Sandy Recovery Division ("SRD") to effectively address the eligibility issues.</p> <p>The first phase determined from the data available that 140 of the initial 230 files reviewed were eligible applicants based on the Program requirements and were therefore not selected for any further review. The second phase of our analysis focused on the remaining 90 applications and incorporated a methodology which included a review of the intake application, the documentation collected from the applicant, and the case log notes. Public record research, as necessary, was conducted regarding the damaged property. Navigant provided a list of the 90 homes and issued a supplemental document request to DCA for each respective finding.</p>	
		<p>DCA provided Navigant with a comprehensive set of data and documents responsive to our preliminary findings regarding the 90 homes and applicants. Our follow up review and testing of the data and DCA's responses determined that the potential eligibility issues for these applicants and homes were properly addressed and were either already resolved, or in the process of being resolved prior to a home's application and eligibility status being completed within the program. Specifically, it was noted by DCA that any discrepancies, or lack of documentation that confirmed or proved eligibility would prevent a home from being able to progress through the approval process and attain a "complete" status. DCA's closeout process as communicated includes verification of previously submitted documentation and obtaining any documentation that may be missing from the applicant file. DCA's system of internal controls governing the initial application process was generally adequate, and it was clear that DCA's process as described, would identify and close any issues prior to a home fulfilling the program obligations. This closeout procedure confirmed that DCA was in the process of implementing additional controls and safeguards pursuant to our recommendations.</p>	

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		<p>In connection with our second technical analysis, Navigant completed an initial review of the risk ranking assigned to each address change recorded within the SIROMS audit log for the 1,863 funded or waitlisted applications in which a change was recorded for at least one of the address fields of interest. Our review of the risk rankings and the underlying address changes further indicated that there can be a number of reasons for a valid address change. In the next Quarter, using an updated iteration of the SIROMS data, Navigant will review and assign a risk ranking to any additional address changes captured within the SIROMS audit log data. The aggregation of the results will be the subject of further review to identify questionable address changes in the next phase of this analysis.</p>	
15.	<p>Brief Description to confirm appropriate data/information has been provided by recipient and what activities have been taken to review in relation to the project/contract/program.</p>	<p>Navigant obtained (1) from DCA, invoice-related documentation and revised RREM Policies and Procedures (2) from DCA, supplemental applicant related data and updated controls implemented related to the recording of restrictive covenants. (3) from the Contractors, regular schedules of their planned RREM applicant meetings and inspections, and some, but not all, of the invoice-related documentation requested; (4) from Cohn Reznick, their updated recommendations matrix and internal monitoring reports; and (5) from CGI, data extracts containing the historical RREM application structured data available at the time of the data migration, the current RREM application structured data available when the extract was prepared, and the current audit trail of changes made to the RREM application data available when the extract was prepared. This data and information was utilized in the analyses described in paragraph 14 above.</p>	

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16.	<p>Description of quarterly auditing activities that have been conducted to ensure procurement compliance with terms and conditions of the contracts and agreements.</p>	<p>As described in paragraph 14 above, during this Quarter, Navigant reviewed the invoices of the RREM Contractors and their subcontractors for billing irregularities; attended and observed homeowner and Contractor meetings and inspections to assess compliance with program policies, procedures and controls, and provided feedback to DCA and the Contractors; and continued to perform two comprehensive technical electronic analyses of RREM application data to identify potentially problematic files for further review.</p>	
17.	<p>Have payment requisitions in connection with the contract/program been reviewed? Please describe</p>	<p>As described in paragraph 14 above, during this Quarter, Navigant continued reviewing the RREM Contractor invoices and their subcontractor invoices, and updated our invoice database to compile relevant invoice details for further analysis. This database enables us to verify the mathematical accuracy of invoiced amounts, validate the invoiced unit rates, identify any second-tier subcontractors, track the amount of the subcontractors' billings to date, track total amounts billed by subcontractors to the terms of their subcontractor agreements or purchase orders, and conduct additional invoice analytics based on the RREM and LRRP application numbers and other key information and underlying source documents. Our review during the Quarter continued to identify potential billing issues that require additional documentation to resolve. Navigant presented our preliminary findings related to the billing issues to DCA. DCA diligently pursued additional documentation from the Contractors and subcontractors to resolve and reconcile our findings. To complete this analysis, we will be examining additional back-up documentation obtained by DCA from the Contractors and the subcontractors which had not been received as of the end of the Quarter.</p>	

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18.	Description of quarterly activity to prevent and detect waste, fraud and abuse.	As described in paragraph 14 above , all of Navigant’s work this Quarter was designed to prevent and detect waste, fraud and abuse. Our review of the invoices of the RREM Contractors and their subcontractors sought to identify any instances of intentional or inadvertent overbilling by the Contractors and their subcontractors; our attendance at homeowner and RREM Contractor meetings and field inspections sought to identify any irregularities in the conduct of RREM meetings and inspections that might be in conflict with RREM program policies and procedures, or that might undermine the controls established for the program; and our two technical electronic analyses of the universe of RREM applications sought to identify potentially problematic applications for further review using data extracts from SIROMS.	
19.	Provide details of any integrity issues/findings	As explained in paragraphs 14 and 18 above , our review of the invoices of the RREM Contractors and their subcontractors identified potential billing issues that we will continue to review and analyze in the next Quarter after receipt of additional documentation from DCA; and the first of two technical electronic analyses of the universe of RREM applications using data extracts from SIROMS which addressed potential applicant eligibility issues was completed and no further action will be necessary; and our second technical analysis to identify potentially invalid changes in the applicant's address is fully underway and is expected to be completed during next Quarter.	

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20.	Provide details of any work quality or safety/environmental/historical preservation issue(s).	N/A	
21.	Provide details on any other items of note that have occurred in the past quarter	N/A	
22.	Provide details of any actions taken to remediate waste, fraud and abuse noted in past quarters	N/A	
23.	Attach a list of hours and expenses incurred to perform your quarterly integrity monitoring review	For the Quarter Ending June 30, 2015: Total hours incurred: 783.70 hours Total fees incurred: \$215,487 Total expenses incurred: \$0	

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24	Add any item, issue or comment not covered in previous sections but deemed pertinent to monitoring program.	N/A	

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

Signature: 

Date: September 30, 2015

**Appendix A
Meetings Conducted
For Quarter Ending 6/30/2015**

I. Department of Community Affairs

- | | |
|-------------------------|---|
| A. David Reiner | Deputy Commissioner, Sandy Recovery Division |
| B. Laura Shea | Assistant Commissioner, Sandy Recovery Division |
| C. Sam Viavattine | Director, Sandy Recovery Division |
| D. Robert Bartolone | Director, Office of Auditing |
| E. Elizabeth Mackay | Assistant Division Director-Legal |
| F. Stephen P. Grady | Assistant Director, Housing Recovery Programs |
| G. Jerry O'Brien | Principal Fiscal Analyst |
| H. Paul Regan | Controller |
| I. Vera Ellen Ricciardi | CFO, Sandy Recovery Division |
| J. Michael Simon | Compliance |

II. Department of the Treasury

- | | |
|--------------------|-------------------------------------|
| A. David Ridolfino | Associate Deputy State Treasurer |
| B. Roseann Kovall | Integrity Oversight Monitor Program |

III. Cohn Reznick

- | | |
|--------------------|----------|
| A. Dean Krogman | Director |
| B. Carolyn Newcomb | Manager |

IV. Gilbane Building Company

- | | |
|--------------------|--------------------------|
| A. Samir Patel | RREM Deputy Director |
| B. Thomas Neider | Senior Project Executive |
| C. Bart Gentile | Project Manager |
| D. James Melton | Project Manager |
| E. Ron Sigler | Project Manager |
| F. Virginia Franco | Project Manager |
| G. Maryellen Evans | Project Manager |
| H. Sean Redmon | Project Manager |

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

- | | |
|-----------------|--------------------------|
| A. Jo Carroll | Program Manager |
| B. Tarek Bahgat | Project Controls Manager |

VI. Housing Recovery Center Personnel

- | | |
|--------------------|-------------|
| A. Vincent Rospond | HRC Manager |
|--------------------|-------------|