



# HISTORIC TOWN OF EATONVILLE, FLORIDA REGULAR CRA MEETING

SEPTEMBER 17, 2026, AT 6:30 PM

## Cover Sheet

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**\*\*NOTE\*\*** Please do not change the formatting of this document (font style, size, paragraph spacing etc.)

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**ITEM TITLE:**

Approval of Resolution CRA-R-2026-43 Adopting the 2026 TOE CRA Comprehensive Policies and Procedures Manual (**Administration**)

**COMMUNITY REDEVELOPMENT ACTION:**

|                       |     |                                                                                                                               |
|-----------------------|-----|-------------------------------------------------------------------------------------------------------------------------------|
| <b>CRA DECISION</b>   | YES | <b>Department:</b> CRA ADMINISTRATION                                                                                         |
| <b>CONSENT AGENDA</b> |     | <b>Exhibits:</b> <ul style="list-style-type: none"> <li>• RESOLUTION CRA-R-2026-43</li> <li>• Exhibit “A” attached</li> </ul> |
| <b>NEW BUSINESS</b>   |     |                                                                                                                               |
| <b>ADMINISTRATIVE</b> |     |                                                                                                                               |
| <b>CRA DISCUSSION</b> |     |                                                                                                                               |

**REQUEST:** Approval of Resolution CRA-R-2026-43

**SUMMARY:** The proposed resolution adopts the 2026 Town of Eatonville CRA Comprehensive Policies and Procedures Manual as the CRA’s official administrative and governance framework. The Manual establishes updated standards for governance, financial controls, procurement, grant compliance, human resources, public records, ethics, cybersecurity, safety, and risk management. It also confirms the CRA’s use of the Town Purchasing Policy adopted by Resolution No. 2023-22, with appropriate CRA-specific role substitutions consistent with CRA Resolution No. CRA-R-2020-9. Staff recommends Board approval to strengthen accountability, legal compliance, operational consistency, and protection of public resources.

**FISCAL & EFFICIENCY DATA:** None

**Resolution CRA-R-2026-43**

**A RESOLUTION OF THE TOWN OF EATONVILLE COMMUNITY REDEVELOPMENT AGENCY BOARD OF DIRECTORS; ADOPTING THE 2026 TOWN OF EATONVILLE COMMUNITY REDEVELOPMENT AGENCY COMPREHENSIVE POLICIES AND PROCEDURES MANUAL; REAFFIRMING AND CLARIFYING THE INCORPORATION OF THE TOWN OF EATONVILLE PURCHASING POLICY ADOPTED BY TOWN RESOLUTION NO. 2023-22, AS LAWFULLY AMENDED, FOR CRA USE; CONFIRMING CRA-SPECIFIC ROLE SUBSTITUTIONS CONSISTENT WITH CRA RESOLUTION NO. CRA-R-2020-9; ESTABLISHING CONTROLLING-AUTHORITY, IMPLEMENTATION, TRAINING, RECORDKEEPING, ANNUAL-REVIEW, AND AMENDMENT REQUIREMENTS; SUPERSEDING PRIOR CRA POLICIES ONLY TO THE EXTENT OF CONFLICT; PROVIDING FOR NO CREATION OF CONTRACTUAL EMPLOYMENT RIGHTS; PROVIDING FOR SEVERABILITY; AND PROVIDING AN EFFECTIVE DATE.**

**WHEREAS**, the Town of Eatonville Community Redevelopment Agency (the “CRA”) is a public body corporate and politic and a public instrumentality organized and operating under Part III of Chapter 163, Florida Statutes, to implement the community redevelopment plan and exercise the powers lawfully delegated to it; and

**WHEREAS**, the CRA Board of Directors (the “Board”) is responsible for establishing policy, approving the CRA budget and redevelopment priorities, safeguarding redevelopment trust fund resources, and exercising those powers that applicable law reserves to the Board; and

**WHEREAS**, effective governance requires current written standards addressing administration, ethics, transparency, public records, financial management, internal controls, procurement, grant compliance, employment practices, safety, risk management, and policy administration; and

**WHEREAS**, the CRA has reviewed and updated its prior comprehensive policies and procedures to reflect the CRA’s status as a legal entity separate and distinct from the Town when acting in its CRA capacity, while preserving documented and lawful shared-service and administrative arrangements; and

**WHEREAS**, CRA Resolution No. CRA-R-2020-9 adopted the Town’s purchasing policy for CRA use and directed that specified Town administrative titles be read as the CRA Executive Director for CRA procurement administration; and

**WHEREAS**, the Town subsequently adopted a revised Purchasing Policy and Procedure Manual by Town Resolution No. 2023-22, and the Board desires to remove uncertainty by expressly ratifying and incorporating that current policy, together with later lawful amendments, subject to the limitations stated in this Resolution; and

**WHEREAS**, the proposed manual incorporates the Town purchasing policy by reference and establishes CRA-specific controls, including purchasing thresholds, written documentation, segregation of duties, formal competition, conflict disclosures, Board approval requirements, federal award standards, and contract-administration requirements; and

**WHEREAS**, the proposed manual further provides that controlling federal and Florida law, binding grant conditions, final court orders, applicable collective bargaining agreements, and later-adopted controlling policies prevail over inconsistent manual language; and

**WHEREAS**, the manual is intended as an administrative governance document and does not create an employment contract, guarantee continued employment, limit lawful management authority, or waive any immunity, defense, privilege, exemption, statutory authority, or Board power; and

**WHEREAS**, the Board finds that adoption and consistent implementation of the manual will strengthen accountability, operational continuity, legal compliance, audit readiness, fair procurement, protection of public resources, and transparent delivery of the CRA's redevelopment program.

**NOW, THEREFORE, BE IT RESOLVED BY THE TOWN OF EATONVILLE COMMUNITY REDEVELOPMENT AGENCY BOARD OF DIRECTORS:**

**SECTION 1. RECITALS AND FINDINGS.** The foregoing recitals are true and correct, are adopted as the legislative and administrative findings of the Board and are incorporated into this Resolution as if fully set forth herein.

**SECTION 2. ADOPTION OF MANUAL.** The Board approves and adopts the document titled "2026 Town of Eatonville Community Redevelopment Agency Comprehensive Policies and Procedures Manual," draft dated August 17, 2026, including its appendices and implementation forms (collectively, the "Manual"), as the official comprehensive policies and procedures of the CRA. The Manual shall be maintained with this Resolution as Exhibit A and is incorporated by reference. If an executed copy of this Resolution and the Manual are maintained as separate records for administrative convenience, the Clerk shall preserve them together within the official adoption record.

**SECTION 3. PROCUREMENT POLICY INCORPORATION AND RATIFICATION.** The Board expressly reaffirms CRA Resolution No. CRA-R-2020-9 and ratifies and incorporates for CRA use the Town of Eatonville Purchasing Policy and Procedure Manual adopted by Town Resolution No. 2023-22, as lawfully amended from time to time, except to the extent a provision is inconsistent with controlling law, a binding grant requirement, the CRA's separate legal status, or an express action of the Board.

For a CRA procurement, references in the incorporated Town purchasing policy to the Town Council shall mean the CRA Board when approval by the governing body of the purchasing entity is required. References assigning procurement-administration duties to the Mayor, Chief Administrative Officer, Finance Director, or a comparable Town official shall mean the CRA Executive Director to the extent authorized by CRA Resolution No. CRA-R-2020-9, this Resolution, the adopted CRA budget, and other lawful written delegations.

No role substitution shall transfer to the Executive Director a power that is nondelegable by law or expressly reserved to the Board. Unusual entity-separation issues, statutory procurements, contested awards, material exceptions to competition, and questions regarding the proper approving authority shall be referred to CRA legal counsel before final action when practicable.

The Executive Director shall promptly advise the Board of any later Town purchasing-policy amendment that materially affects CRA thresholds, approval authority, competition, contract terms, or internal controls and shall present any conforming CRA amendment that legal counsel or the Executive Director determines is necessary.

**SECTION 4. HIERARCHY OF CONTROLLING AUTHORITY.** The Manual shall be interpreted and administered consistently with the Florida Constitution; applicable federal and Florida statutes and regulations; the CRA's enabling instruments and community redevelopment plan; valid Town ordinances and policies lawfully applicable to the CRA; binding grant and pass-through-entity requirements; final court orders; applicable collective bargaining agreements; and duly adopted Board actions.

If a Manual provision conflicts with a higher or later controlling authority, the controlling authority governs and the inconsistent Manual provision is suspended only to the minimum extent necessary. The remaining provisions continue in effect. References in the Manual to statutes, regulations, monetary thresholds, posters, forms, and official guidance mean the current applicable versions unless the Board expressly provides otherwise.

**SECTION 5. IMPLEMENTATION AUTHORITY AND LIMITS.** The Executive Director is authorized and directed to administer the Manual; maintain the official controlled copy; issue nonmaterial administrative procedures, instructions, workflows, forms, and checklists consistent with the Manual; assign responsible staff; and take other routine actions reasonably necessary for implementation.

Administrative implementation may clarify workflow, improve documentation, update official form references, or conform ministerial details to controlling law. It may not create a new substantive policy, materially change a procurement or expenditure threshold, expand delegated authority, waive competition or Board approval, alter employee benefits or material terms of employment, commit unbudgeted funds, or amend a nondelegable Board requirement.

Nothing in this Resolution authorizes an expenditure or contract not otherwise budgeted and approved, waives a required procurement process, or permits CRA resources to be used outside lawful community redevelopment purposes and the adopted community redevelopment plan.

**SECTION 6. TRAINING ACKNOWLEDGMENT AND DISTRIBUTION.** The Executive Director shall provide the Manual, or the portions applicable to assigned duties, to Board members, CRA employees, volunteers, agents, contractors, evaluators, and other covered persons. Orientation and periodic training shall be provided as appropriate regarding ethics, Sunshine and public records requirements, cybersecurity, financial controls, procurement, federal and state awards, equal employment opportunity, accommodations and leave, timekeeping, safety, and reporting obligations.

Employees shall sign a receipt and acknowledgment confirming access to and responsibility for following applicable policies. An acknowledgment confirms receipt and understanding only; it does not create a contract of employment or modify any lawful employment status.

**SECTION 7. RECORDS CONTROLS AND ACCOUNTABILITY.** The Executive Director shall ensure that implementation records, acknowledgments, procurement files, approvals, legal reviews, grant documentation, and annual-review records are retained under Chapter 119, Florida Statutes, applicable State of Florida records-retention schedules, grant conditions, and any litigation, audit, investigation, or preservation hold.

Material violations, suspected fraud or theft, significant internal-control failures, contested procurements, material grant noncompliance, and circumstances reasonably likely to expose the CRA to substantial legal or financial risk shall be reported to the Board Chair and legal counsel and presented to the Board when required by law or appropriate for corrective action.

**SECTION 8. ANNUAL REVIEW AND AMENDMENTS.** At least annually, and whenever a material change in controlling authority occurs, the Executive Director shall review the Manual in consultation with appropriate financial, procurement, human-resources, risk-management, grant-compliance, records, and legal personnel. The review shall address current law, regulatory thresholds, official notices and forms, Town purchasing-policy amendments, Board resolutions, grant requirements, audit findings, and operational experience.

Material amendments to Board policy require Board approval by resolution or other lawful Board action. The Executive Director may approve nonmaterial administrative revisions within Section 5 of this Resolution, provided that each revision is dated, documented in the Manual's revision history or document-control record, and reported to the Board as part of the next annual review or sooner if operationally significant.

**SECTION 9. SUPERSESSION AND PRESERVATION OF PRIOR ACTIONS.** Upon the effective date, the Manual supersedes earlier CRA manuals, policies, procedures, memoranda, and directives only to the extent they address the same subject and conflict with this Resolution or the Manual. Policies and Board actions not in conflict remain in effect.

This Resolution does not invalidate a procurement, contract, personnel action, grant action, payment, delegation, or other CRA action lawfully taken before the effective date. Pending matters shall transition to the Manual to the extent practicable and lawful without impairing existing contractual rights or procurement fairness.

**SECTION 10. NO CONTRACTUAL RIGHTS OR WAIVER.** Neither this Resolution nor the Manual creates an express or implied employment contract, guarantee of continued employment, private right of action, entitlement to progressive discipline, or vested right beyond that required by law or a binding written agreement. Nothing herein waives sovereign immunity, statutory limitations of liability, attorney-client privilege, work-product protection, public-record exemptions, defenses, or any lawful power of the CRA or Board.

**SECTION 11. SEVERABILITY.** If any section, sentence, clause, phrase, or application of this Resolution or the Manual is held invalid or unenforceable by a court of competent jurisdiction, the invalidity shall not affect the remaining provisions or applications, which shall remain in effect to the fullest extent permitted by law.

**SECTION 12. DIRECTION TO CLERK AND ADMINISTRATIVE CODIFICATION.** The Clerk is directed to assign the final resolution number, insert the adoption and effective dates, maintain the signed Resolution and Exhibit A in the official records, and provide a certified copy to the Executive Director and CRA legal counsel. The Executive Director may add the adopted resolution number and date to the Manual’s document-control and certification pages without further Board action.

**SECTION 13. EFFECTIVE DATE.** This Resolution and the Manual shall take effect immediately upon adoption, unless the Board specifies a later date in the motion of adoption.

**PASSED AND ADOPTED** by the Town of Eatonville Community Redevelopment Agency Board of Directors at a duly noticed public meeting held on the \_\_\_\_ day of \_\_\_\_\_, 2026.

**TOWN OF EATONVILLE  
COMMUNITY  
REDEVELOPMENT AGENCY**

**ATTEST:**

\_\_\_\_\_  
Chair, CRA Board of Directors

\_\_\_\_\_  
Board Clerk

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**APPROVED AS TO FORM AND LEGAL SUFFICIENCY:**

\_\_\_\_\_  
CRA Attorney

Date: \_\_\_\_\_

**EXHIBIT A**

**2026 Town of Eatonville Community Redevelopment Agency  
Comprehensive Policies and Procedures Manual**

**Draft dated September 17, 2026**

The complete Manual, including all appendices and implementation forms, is attached to and incorporated by reference into Resolution No. CRA-R-2026-31.

Clerk certification: The copy maintained with the executed Resolution is the Manual approved by the Board on \_\_\_\_\_, 2026.

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Board Clerk / Date