

Town of Eatonville



**TOWN OF EATONVILLE
COMMUNITY REDEVELOPMENT AGENCY**

2026

**COMPREHENSIVE POLICIES AND
PROCEDURES MANUAL**

Governance | Administration | Finance | Procurement | Human Resources | Federal Awards

Prepared for adoption by the Eatonville Community Redevelopment Agency Board of Directors

Draft dated August 17, 2026

Supersedes prior CRA policies only to the extent expressly adopted by Board resolution.

Document Control and Adoption

Item	Manual Control
Document title	2026 Town of Eatonville CRA Comprehensive Policies and Procedures Manual
Agency	Town of Eatonville Community Redevelopment Agency (CRA)
Effective date	Upon adoption by CRA Board resolution
Policy owner	CRA Executive Director
Approval authority	CRA Board of Directors, except administrative procedures delegated by the Board
Review cycle	At least annually and whenever controlling law, grant requirements, Town purchasing policy, or CRA governance changes
Controlling procurement documents	Town of Eatonville Purchasing Policy adopted by Resolution 2023-22, as lawfully amended; CRA Resolution CRA-R-2020-9, as lawfully amended
Legal review	Board/CRA Attorney review required before adoption and for material amendments

This manual is an administrative governance document and is not a contract of employment, a guarantee of continued employment, or a waiver of any immunity, defense, privilege, public-record exemption, statutory authority, or Board power. If any provision conflicts with federal or Florida law, a binding grant condition, a final court order, a collective bargaining agreement, or a later-adopted Board/Town policy that lawfully controls the CRA, the higher or later controlling authority governs and the inconsistent manual language is suspended to the minimum extent necessary.

Legal-update rule. References to statutes, regulations, monetary thresholds, posters, forms, and agency guidance mean those authorities as amended. Staff shall use the current official version at the time of action. The Executive Director shall promptly present material changes to the Board for conforming amendments.

Source Documents Incorporated

- The prior Town of Eatonville CRA Comprehensive Policies and Procedures Manual, including its four-part structure covering administrative, finance/accounting, procurement, and human resources policies and procedures.
- CRA Resolution CRA-R-2020-9, which adopted the Town procurement policy for CRA use and directed that references to Mayor, Finance Director, or CAO be replaced with Executive Director for CRA procurement administration.
- Town of Eatonville Resolution 2023-22 and the attached Purchasing Policy & Procedure Manual, including vendor-selection thresholds, formal solicitation processes, contracts, purchase orders, emergency purchases, payment procedures, purchasing cards, and surplus disposition.
- Applicable federal statutes and regulations; Florida Statutes and Constitution; and grant-specific terms applicable to CRA programs and expenditures.

The Town Purchasing Policy is incorporated by reference rather than duplicated verbatim. This manual summarizes CRA-specific application rules. If a Town purchasing threshold or process is later amended, the current Town policy controls to the extent it is lawfully applicable to the CRA and consistent with CRA Board action.

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1. Introduction, Authority, Scope and Definitions

1.1 Purpose

The CRA maintains a written, current and practical system of policies and procedures to guide Board members, officers, employees, volunteers, agents and contractors in carrying out public responsibilities, safeguarding public resources, implementing the community redevelopment plan, and providing consistent services to the public.

Legal / policy authority: Fla. Stat. Part III, ch. 163; CRA enabling resolutions and redevelopment plan.

Procedures and controls

- Policies state what the CRA requires; procedures state how the requirement is implemented. If a procedure conflicts with an adopted policy, the policy controls.
- The Executive Director is responsible for maintaining the official manual, training affected personnel, and proposing updates to the Board.
- Each employee is responsible for knowing and following policies applicable to the employee's duties and for asking for guidance before acting when authority is uncertain.

1.2 Legal status and separate public entity

The CRA is a public body corporate and politic and a public instrumentality created under Florida community redevelopment law. When the Town governing body serves as the CRA Board, members act as the head of a legal entity that is separate and distinct from the Town governing body. CRA actions, contracts, accounts and minutes must therefore identify the CRA capacity when the CRA is acting.

Legal / policy authority: Fla. Stat. ss. 163.356-.387, including ss. 163.357, 163.367, 163.371 and 163.387.

Procedures and controls

- Agenda items and contracts shall clearly state whether the Town or CRA is the contracting/acting entity.
- CRA funds shall be used only for lawful redevelopment purposes and in accordance with the adopted redevelopment plan and trust-fund requirements.
- Interlocal, shared-service, payroll or administrative arrangements with the Town shall be documented and allocated on a reasonable, supportable basis.

1.3 Scope

Unless a law or written agreement provides otherwise, this manual applies to CRA employees and to Board members, volunteers, agents and contractors when performing CRA functions. Contractor personnel are not CRA employees unless the legal test for employment is independently satisfied. Contract language shall impose applicable ethics, records, E-Verify, grant, safety and confidentiality duties.

1.4 Definitions

For this manual, "Board" means the CRA Board of Directors; "Executive Director" means the CRA chief executive officer or properly designated acting official; "Town Policy" means the Town of Eatonville policy incorporated by CRA action; "public record" has the meaning provided by Florida law; "federal award" includes federal financial assistance received directly or through a pass-through entity; and "employee" means a person treated as a CRA employee under applicable law and payroll practice.

2. Governance, Ethics, Transparency and Records

2.1 Board and Executive Director responsibilities

The Board establishes policy, approves the CRA budget and redevelopment priorities, exercises nondelegable statutory powers, and approves contracts and expenditures requiring Board action. The Executive Director administers Board policy, manages staff, implements the budget, supervises procurement within delegated authority, maintains internal controls, and reports material risks and compliance matters to the Board.

2.2 Ethics and conflicts of interest

All CRA public officers and employees shall comply with the Florida Code of Ethics and any stricter applicable Town/CRA ethics provisions. No person may use public office or employment to secure a special privilege, benefit or exemption for self or others, misuse confidential information, accept prohibited gifts, or participate in procurement when an actual or apparent conflict compromises impartiality.

Legal / policy authority: Fla. Stat. ch. 112, pt. III; Fla. Stat. s. 163.367; Town purchasing ethics provisions.

Procedures and controls

- Board members and employees shall disclose conflicts as required by law and recuse or abstain when legally required.
- Procurement evaluation committee members shall complete a conflict-of-interest disclosure before reviewing submittals and update it if circumstances change.
- Employees shall not direct CRA purchases to themselves, immediate family members, or businesses in which they have a prohibited interest except where expressly authorized by law after written legal review.
- Gifts, honoraria and travel paid by third parties shall be handled under chapter 112, Florida Statutes, and applicable local ethics rules.

2.3 Sunshine Law and public meetings

Meetings of the CRA Board and any committee or body subject to Florida's Government in the Sunshine Law shall be open to the public, reasonably noticed, and minuted. Members shall not use intermediaries, serial communications, text messages, email, social media, or other means to conduct nonpublic discussion of matters that foreseeably will come before the covered body.

Legal / policy authority: Fla. Const. art. I, s. 24; Fla. Stat. ch. 286 and applicable special statutes.

Procedures and controls

- Notice shall be reasonable under the circumstances and shall comply with any specific statutory or local notice rule.
- Meeting minutes shall reflect motions, votes and required disclosures; recordings may supplement but do not replace required minutes.
- Remote participation, closed sessions and exemptions may be used only when authorized by law and after legal review.

2.4 Public records and retention

CRA records made or received in connection with official business are public records unless a specific exemption applies. The CRA shall preserve, classify, retain, produce and dispose of records in accordance with chapter 119, Florida Statutes, and the State of Florida records-retention schedules.

Legal / policy authority: Fla. Const. art. I, s. 24; Fla. Stat. ch. 119; Fla. Admin. Code and State retention schedules.

Procedures and controls

- Employees shall conduct CRA business through approved systems whenever practicable. Public records created on personal devices or accounts remain subject to retention and disclosure duties.
- Public-record requests do not require a special form or statement of purpose. Staff shall promptly acknowledge and route requests to the designated records custodian.
- Exempt or confidential information shall be redacted only under a cited legal exemption; the remainder shall be produced.
- No employee may destroy, alter, conceal or remove a record subject to retention, litigation hold, audit hold, investigation, public-record request or other preservation duty.

2.5 Whistleblower protection and nonretaliation

The CRA prohibits retaliation against an employee, applicant, former employee or other protected person for good-faith reporting of suspected illegality, gross mismanagement, gross waste, malfeasance, misfeasance, safety danger, discrimination, wage violations, fraud, grant noncompliance or other protected conduct. Reports may be made to the Executive Director, Board Chair, CRA/Town Attorney, designated ethics or HR official, or any external body authorized by law.

Legal / policy authority: Fla. Stat. ss. 112.3187-.31895; applicable federal anti-retaliation statutes.

Procedures and controls

- Reports involving the Executive Director shall bypass the Executive Director and be directed to the Board Chair and legal counsel.
- Confidentiality will be maintained to the extent permitted by law; no promise of absolute confidentiality may be made where public-record or due-process laws require disclosure.
- Retaliation allegations shall be investigated separately from the underlying concern.

3. Administrative Operations and Information Governance

3.1 Official communications, mail and email

CRA mail, email, messaging, telephone and collaboration systems are official resources. Employees shall use them primarily for CRA business, preserve records according to content and retention schedule, and avoid transmitting protected information through insecure channels.

Legal / policy authority: Fla. Stat. ch. 119; Florida records-retention schedules.

Procedures and controls

- Incoming official mail requiring action shall be date-stamped or electronically logged and routed promptly.
- Contracts, official approvals, legal notices and material project correspondence shall be filed in the authoritative project or records system rather than left only in an inbox.
- Electronic messages are retained based on content, not medium; transitory messages may be disposed only under the applicable retention schedule.

3.2 Acceptable use, cybersecurity and privacy

Users have no expectation of personal privacy in CRA systems except as provided by law. CRA equipment, accounts, credentials and data shall be used in a secure, lawful and professional manner.

Procedures and controls

- Use multifactor authentication where available; do not share passwords; report suspected phishing, malware, lost devices or unauthorized access immediately.
- Do not store Social Security numbers, medical information, bank data, security information, exempt addresses or other sensitive data in unapproved systems.
- Software, cloud services, artificial intelligence tools and external data-sharing platforms may be used only when approved and when contracts address public records, confidentiality, data ownership, security, retention and breach obligations.
- Employees shall verify material outputs generated by automated or AI systems and remain responsible for accuracy, legality, procurement integrity and public-record compliance.

3.3 Property and asset accountability

CRA property shall be acquired, tagged when appropriate, inventoried, safeguarded, used for public purposes, and disposed of only under applicable purchasing/property rules. Lost, stolen or damaged property shall be reported promptly. No employee may convert CRA property to personal use.

3.4 Political activities

CRA resources may not be used to support or oppose a candidate, political party or campaign except as specifically authorized by law for neutral governmental purposes. Employees retain lawful personal political rights but shall act on personal time, without using CRA authority, funds, equipment, logo, email, staff time or coercion.

Legal / policy authority: 5 U.S.C. ch. 15 where applicable; Fla. Stat. chs. 104, 106, 112; IRS and grant restrictions where applicable.

Procedures and controls

- Employees whose positions are funded wholly or partly by federal loans or grants shall comply with any applicable Hatch Act restrictions.
- Nothing in this policy limits protected voting, lawful off-duty political expression, or rights secured by law.

3.5 Travel and training

Official travel must be necessary, authorized in advance, budgeted, documented, and reimbursed only for lawful and reasonable costs under the controlling CRA/Town travel policy and Florida law. Personal upgrades, companion costs, alcohol and unallowable entertainment are not reimbursable unless specifically permitted by law and written policy.

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4. Finance, Accounting, Budget and Internal Control

4.1 Fiscal stewardship

CRA funds shall be administered under a system of internal control that provides reasonable assurance of legal compliance, accurate reporting, budget control, asset protection, fraud prevention and timely correction of deficiencies. Duties for authorization, custody, recordkeeping and reconciliation shall be separated to the extent practicable; compensating review shall be documented where staffing is limited.

4.2 Budget administration

No expenditure or encumbrance may be made without lawful budget authority. The Executive Director shall monitor actual and projected revenues and expenditures, present required budget amendments to the Board, and prevent expenditures that would cause an unlawful deficit or use of restricted funds.

Legal / policy authority: Fla. Stat. ch. 163, pt. III; applicable municipal budget law; adopted CRA budget.

Procedures and controls

- Budget transfers may be made only within authority granted by Board policy/resolution and Florida law.
- Capital and multiyear commitments shall identify current-year funding and any nonappropriation/funding-contingency language required by law.
- CRA redevelopment trust funds shall be used only for purposes permitted by the Community Redevelopment Act and the adopted redevelopment plan.

4.3 Accounting records and reconciliations

The CRA shall maintain complete accounting records in accordance with generally accepted accounting principles applicable to governmental entities. Bank and investment accounts, receivables, payables, payroll, capital assets, debt, grants and trust-fund activity shall be reconciled regularly and reviewed by a person independent of the preparer when practicable.

4.4 Cash receipts and deposits

All collections shall be receipted, safeguarded and deposited intact promptly. Cash handling shall use sequential receipts or equivalent system controls, restricted access, daily balancing when collections occur, and documented over/short resolution. Employees may not borrow or substitute personal checks for public funds.

4.5 Disbursements and invoice approval

Payments require evidence of a valid obligation, receipt or acceptance of goods/services, correct account coding, proper procurement approval, and authorized payment approval. Duplicate, altered, unsupported or premature invoices shall not be paid.

Legal / policy authority: Fla. Stat. ss. 218.70-.80 and other applicable prompt-payment provisions.

Procedures and controls

- Three-way matching (purchase order/contract, receiving evidence, invoice) shall be used when applicable.
- Electronic payments shall use dual control for vendor banking changes and payment release. Vendor banking changes must be independently verified using trusted contact information.
- Invoices shall be processed within the time required by the Florida Local Government Prompt Payment Act and any stricter contract or grant term.

4.6 Payroll

Payroll shall be based on authorized employment, approved pay rates and complete time/leave records. Changes to pay, deductions, status or direct deposit shall be independently validated. Payroll shall comply with wage-and-hour, tax, retirement and reporting requirements.

4.7 Capital assets and disposal

Capitalization thresholds and depreciation methods shall follow the CRA's adopted accounting policy and applicable governmental accounting standards. Disposal of surplus or obsolete property shall follow the Town Purchasing Policy as incorporated for CRA use, applicable Florida law, grant restrictions and Board authorization requirements.

4.8 Debt and long-term obligations

The Board alone may approve debt or other long-term financing except as lawfully delegated. Each proposed obligation shall document public purpose, legal authority, repayment source, affordability, covenants, procurement of professional services, disclosure requirements and monitoring responsibility. No employee may pledge CRA credit or assets without authority.

4.9 Financial reporting, audit and CRA annual report

The CRA shall prepare accurate and timely financial reports, cooperate with independent audit requirements, correct findings, and satisfy CRA annual reporting and website publication duties.

Legal / policy authority: Fla. Stat. ss. 163.371 and 163.387; ch. 218 where applicable.

Procedures and controls

- By the statutory annual deadline, publish and file the CRA annual report containing required audit and performance information.
- Maintain digital boundary maps and other website disclosures required by the Community Redevelopment Act.
- Track audit findings and management responses to closure.

5. Procurement and Contracting

This section is intended to make CRA procurement consistent with the Town of Eatonville Purchasing Policy adopted by Resolution 2023-22 while giving effect to CRA Resolution CRA-R-2020-9. The Town policy is incorporated by reference. Where it assigns duties to the Mayor, Finance Director or CAO, those duties are performed for the CRA by the Executive Director to the extent provided by CRA-R-2020-9. References to Town Council approval are read as CRA Board approval when the CRA is the purchasing entity. The CRA Attorney should confirm this role-conversion rule when a transaction presents an unusual statutory or separation-of-entity issue.

5.1 Core procurement principles

CRA purchases shall be legal, necessary, budgeted, impartial, transparent, documented, competitive when required, and structured to obtain best value while preserving fair and equitable treatment of vendors. No purchase may be divided or sequenced to evade a quote, competition or approval threshold.

Procedures and controls

- Aggregate known or reasonably anticipated purchases from the same vendor for the fiscal year when applying thresholds, consistent with Town policy.
- Use specifications that encourage free and open competition and avoid unnecessary brand restrictions.
- No vendor may begin work before required approvals, contract execution, purchase order issuance, insurance, bonds, E-Verify documentation and grant conditions are satisfied.

5.2 Informal vendor selection thresholds

For purchases not exceeding \$25,000, use the Town policy's informal selection documentation unless a lawful exception applies. The controlling amount is the total anticipated purchase/contract value, including reasonably expected renewals, options and related purchases as required by law/policy.

Total amount	Minimum documentation under Town policy	CRA approval
Up to \$1,000	No quote required by Town table; price reasonableness still expected	Executive Director or lawful designee within written delegation
\$1,001 - \$2,500	Two documented written quotes	Executive Director
\$2,501 - \$7,500	Three documented written quotes	Executive Director
\$7,501 - \$25,000	Three documented written quotes	Executive Director
\$25,000.01 and above	Formal competitive process unless exception/other law applies	CRA Board

Quotes must be comparable, identify the vendor, contact, date, item/service description, price and terms, and be retained in the procurement file. Quotes older than the Town policy's validity period must be refreshed. Staff should use written quotes whenever practicable even if the Town policy permits verbal documentation.

5.3 Formal competitive procurement

When the total annual cost exceeds \$25,000, or when otherwise required by law or deemed in the CRA's best interest, formal competition shall be used. Methods may include Invitation to Bid (ITB), Request for Proposals (RFP), Request for Qualifications (RFQ) and Letter of Interest (LOI) as described in the Town policy.

Procedures and controls

- ITB is generally used for well-defined specifications and award to the lowest responsive and responsible bidder.
- RFP is used when approach, experience, qualifications and other factors in addition to price are material; evaluation criteria and weights shall be stated in the solicitation.
- RFQ/LOI may be used for qualification-based selection, including professional services where Florida law requires qualification-based procedures.
- Formal solicitations shall provide the public notice period required by Town policy and any longer statutory or grant requirement, and shall include response deadlines, protest/inquiry procedures if applicable, insurance, bonds, public-record, E-Verify, ethics, grant and contract terms.

5.4 Evaluation committees and award

Evaluation committee members shall be selected for relevant competence and impartiality, receive procurement and Sunshine/Public Records guidance, complete conflict disclosures, independently score proposals under published criteria, and preserve all notes and scoring records.

Procedures and controls

- Communications with proposers during a formal procurement shall occur only through the designated procurement contact.
- Clarifications shall not be used to permit a material post-deadline rewrite that would prejudice competitors.
- Award recommendations shall document responsiveness, responsibility, scoring, due diligence, funding and legal/procurement review.
- Board approval is required at and above the applicable threshold and whenever otherwise required by law or Board policy.

5.5 Exceptions to competition

Exceptions are construed narrowly and must be documented before commitment whenever practicable. Town policy exceptions include sole source, emergency purchases, authorized contracts of federal/state/other governmental entities (“piggybacking”), certain contractual services, and cooperative purchasing.

Procedures and controls

- Sole source requires written facts showing that only one source can meet the CRA’s legitimate needs; convenience or prior relationship alone is insufficient.
- Piggyback/cooperative use requires confirmation that the originating procurement was competitively awarded and legally available for CRA use, and that contract scope and pricing cover the intended purchase.
- Emergency procurement is limited to the extent and duration necessary to address the emergency, with written justification and after-the-fact Board reporting/approval when required.
- All exception files must identify the specific policy/statutory basis and approval authority.

5.6 Purchase orders

A fully approved purchase order is the CRA’s authorization to acquire specified goods/services and generally the vendor’s authorization to perform or ship. Purchase orders shall reflect the anticipated total amount of business with a vendor and shall not be split to avoid higher approval or formal competition. Supporting documentation shall be retained with the requisition/procurement file.

5.7 Contracts, amendments and change orders

Contracts shall be in writing when required by Town policy, law, grant terms, risk or complexity. Material amendments and changes in scope, price or term require the same level of authority as the original agreement or the higher authority triggered by the amended total.

Procedures and controls

- No change order may be used to circumvent competition or materially transform the original procurement without legal/procurement review.
- Contracts shall address scope, compensation, term, termination, insurance, indemnity to the extent lawful, records, audit, E-Verify, ethics, confidentiality, cybersecurity where applicable, ownership, dispute terms, grant clauses and funding/nonappropriation where appropriate.
- Contract managers shall document performance, deliverables, invoices, insurance, amendments, disputes and closeout.

5.8 Professional architectural, engineering, landscape architectural, surveying and mapping services

When the Consultants' Competitive Negotiation Act (CCNA) applies, the CRA shall publicly announce and select professional services based on qualifications in accordance with section 287.055, Florida Statutes, using the current statutory category thresholds. Price shall not be used in the qualifications phase where prohibited; compensation is negotiated after ranking the most qualified firms.

Legal / policy authority: Fla. Stat. s. 287.055 and current s. 287.017 thresholds.

Procedures and controls

- Staff must check the current Category Two and Category Five thresholds before solicitation because statutory dollar categories may change.
- Continuing contracts shall satisfy all current statutory limitations and requirements.
- CCNA procurement files shall include public announcement, qualifications, committee records, ranking, negotiation documentation, truth-in-negotiation certification when required, Board action and executed contract.

5.9 Public construction

Public construction procurement shall comply with applicable competitive award, licensing, bonding, retainage, prompt-payment, wage and grant requirements. Before issuing a construction solicitation, staff shall determine whether sections 255.05, 255.20, 255.099/255.0991 and other project-specific laws apply.

Legal / policy authority: Fla. Stat. ss. 255.05, 255.20, 255.099 and 255.0991, as applicable.

Procedures and controls

- Payment and performance bonds shall be required when mandated by section 255.05 or other controlling law/contract, in the legally required amount and form.
- For projects subject to statutory competitive construction requirements, the CRA shall use the current threshold and exceptions in Florida law.
- When state-appropriated funds are involved, prohibited local preference rules and any required solicitation disclosures shall be observed.

5.10 Purchasing cards, petty cash and direct payments

Purchasing cards and petty cash are convenience mechanisms, not exceptions to procurement requirements. Cardholders/custodians must comply with the current Town P-card and petty-cash provisions

incorporated for CRA use, including transaction limits, prohibited purchases, receipts, reconciliation, supervisory review, sales-tax exemption and prompt reporting of lost/stolen cards or suspected misuse.

5.11 Vendor eligibility, E-Verify and debarment

Before award or payment where required, the CRA shall verify vendor eligibility under Florida and federal law. Public contracts shall include E-Verify requirements required by section 448.095, Florida Statutes. Federally funded contracts shall include suspension/debarment checks and required federal clauses.

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6. Federal and State Award Compliance

6.1 Applicability and hierarchy

For expenditures charged in whole or in part to a federal award, the CRA shall comply with the Uniform Guidance and the specific award. When federal, state, local and Town/CRA procurement rules differ, the CRA shall follow the most restrictive requirement unless the grantor or law expressly establishes a different rule. Federal procurement standards supplement, not replace, the Town/CRA purchasing rules.

6.2 Federal procurement standards

For federal awards, procurement shall satisfy 2 C.F.R. §§ 200.317-200.327 and applicable agency-specific rules.

Legal / policy authority: 2 C.F.R. §§ 200.317-.327 and Appendix II.

Procedures and controls

- Maintain written standards of conduct covering conflicts of interest and organizational conflicts.
- Use full and open competition; avoid unnecessary restrictive specifications, geographic preferences unless authorized, and noncompetitive practices.
- Perform and document cost or price analysis when required and negotiate profit as required for certain noncompetitive procurements.
- Take affirmative steps to utilize small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor-surplus-area firms when applicable.
- Apply domestic preference and recovered-material requirements when applicable.
- Include applicable 2 C.F.R. Part 200 Appendix II clauses, federal agency clauses and flow-downs in contracts and subcontracts.
- Retain procurement and award records for the federal retention period and longer when litigation, claims, audit or other holds apply.

6.3 Federal construction and labor standards

Before bidding federally assisted construction, the CRA shall determine whether Davis-Bacon prevailing wage requirements, Copeland Anti-Kickback, Contract Work Hours and Safety Standards Act, Build America Buy America, Section 3, environmental review, or other program-specific labor/material rules apply. Required wage determinations and contract clauses shall be included before solicitation and award.

6.4 Grant financial controls

Each award shall have a responsible program manager and fiscal owner. The file shall document allowable cost determination, budget, period of performance, procurement method, match, program income, equipment, indirect cost treatment, subrecipient/contractor classification, monitoring, reporting and closeout.

6.5 Subrecipients and contractors

The CRA shall make and document subrecipient-versus-contractor determinations under the Uniform Guidance. Subawards shall include required data elements and conditions, risk assessment, monitoring and audit follow-up. Vendor contracts shall be procured and managed under procurement rules rather than subrecipient rules.

7. Human Resources and Employment Practices

The CRA's employment policies are intended to comply with federal and Florida law while preserving lawful public-employer discretion. Because coverage thresholds and eligibility tests differ by statute, this manual generally applies the protective practice broadly unless a law expressly requires a different result. Nothing creates eligibility for a statutory benefit when the legal eligibility elements are not met.

7.1 Equal employment opportunity

The CRA provides equal employment opportunity in recruitment, hiring, assignment, compensation, training, promotion, discipline, discharge and all other terms and conditions of employment. The CRA prohibits discrimination and harassment based on race, color, religion, sex, pregnancy, childbirth or related medical condition, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, military/veteran status, or any other status protected by federal, Florida or applicable local law.

Legal / policy authority: Title VII; Pregnancy Discrimination Act; ADA/ADAAA; ADEA; GINA; Equal Pay Act; PWFA; Fla. Stat. ch. 760; other applicable law.

Procedures and controls

- Employment decisions shall be based on legitimate job-related criteria and documented consistently.
- No retaliation is permitted against a person who requests accommodation, reports discrimination/harassment, participates in an investigation, files a charge, discusses wages where protected, or exercises another protected right.
- Post required federal and Florida workplace notices and update them when agencies issue new mandatory versions.

7.2 Anti-harassment and complaint procedure

Harassment, including sexual harassment and hostile-work-environment conduct based on a protected status, is prohibited whether committed by a supervisor, coworker, Board member, contractor, vendor, applicant or member of the public.

Procedures and controls

- Employees may report concerns to any supervisor, the Executive Director, designated HR contact, Board Chair or legal counsel; employees are not required to complain to the person accused.
- Supervisors who observe or receive a complaint must promptly report it to the designated investigator/HR authority and may not screen it out as "informal."
- Investigations shall be prompt, impartial and appropriately documented; interim measures may be taken without prejudging the outcome.
- Corrective action will be proportional to findings and may include training, counseling, discipline, contract remedies or termination. Retaliation is separately prohibited.

7.3 Disability accommodation

The CRA will provide reasonable accommodation to qualified applicants and employees with disabilities unless doing so would impose an undue hardship or create a direct threat that cannot be reduced by reasonable accommodation. The CRA will engage in a timely, good-faith interactive process and will request only medical information that is job-related and consistent with business necessity.

Legal / policy authority: Americans with Disabilities Act, as amended; 42 U.S.C. ch. 126; Fla. Stat. ch. 760.

Procedures and controls

- Accommodation requests need not use special words and may be oral or written.

- Medical information shall be maintained separately from general personnel files and disclosed only as permitted by law.
- Leave, modified schedules, equipment, workplace changes, reassignment to a vacant position and other measures will be considered as required by law.

7.4 Pregnancy, childbirth and related accommodations

The CRA prohibits pregnancy discrimination and will provide reasonable accommodations for known limitations related to pregnancy, childbirth or related medical conditions as required by the Pregnant Workers Fairness Act and other law. The CRA will not require leave when another reasonable accommodation would permit the employee to continue working, absent lawful justification.

Legal / policy authority: Title VII/Pregnancy Discrimination Act; Pregnant Workers Fairness Act, 42 U.S.C. §§ 2000gg et seq.; 29 C.F.R. pt. 1636.

Procedures and controls

- Examples may include additional breaks, seating, water, schedule changes, temporary suspension of certain duties, light duty where appropriate, leave, telework where feasible, parking or uniform modifications.
- Documentation will be requested only when permitted and necessary under applicable regulations.

7.5 Lactation / pump at work

The CRA will provide covered employees reasonable break time as needed to express breast milk and a functional space, other than a bathroom, that is shielded from view and free from intrusion for the period required by federal law. Compensation for break time will follow FLSA principles and applicable CRA break rules.

Legal / policy authority: FLSA, 29 U.S.C. s. 218d, as amended by the PUMP Act; applicable Florida law.

7.6 Recruitment, selection and background screening

Vacancies shall be filled through a fair process using written job-related qualifications. Job postings, interviews, testing and selection shall comply with EEO and disability laws. Background checks, driving records, references, credentials and consumer reports may be used only when job-related, lawful, consistently applied and properly authorized.

Legal / policy authority: Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.; Title VII; ADA; applicable Florida public-record/background-screening laws.

Procedures and controls

- If a third-party consumer reporting agency is used, provide required Fair Credit Reporting Act disclosures, authorization, pre-adverse-action notice with report and rights summary, and final adverse-action notice.
- Criminal-history information shall be evaluated under applicable law and EEOC guidance using job-related criteria rather than blanket exclusions unless a law requires exclusion.
- Positions requiring licenses, driving or fiduciary duties shall have those requirements stated in the job description.

7.7 Employment eligibility verification

Every new employee must complete federal Form I-9 within the required federal timeframe. As a Florida public agency, the CRA shall use E-Verify for new employees as required by section 448.095, Florida Statutes, and retain required verification documentation for the applicable period. Verification shall be administered without discrimination based on citizenship, immigration status or national origin.

Legal / policy authority: 8 U.S.C. § 1324a; 8 C.F.R. pt. 274a; Fla. Stat. s. 448.095.

7.8 Classification, job descriptions and independent contractors

Each position shall have a current job description identifying essential functions, FLSA status, reporting relationships, minimum qualifications and physical/other requirements that are actually job-related. Exempt/nonexempt status shall be determined from federal duties and salary tests, not title. Independent-contractor classification requires a documented legal/factual analysis and may not be used to avoid payroll, tax, benefit or employment obligations.

7.9 Workweek, timekeeping and overtime

Nonexempt employees shall accurately record all hours worked. Off-the-clock work is prohibited. Supervisors shall not permit or encourage inaccurate time records. Overtime should be authorized in advance, but all overtime actually worked must be reported and paid or credited as lawful compensatory time.

Legal / policy authority: Fair Labor Standards Act, 29 U.S.C. §§ 201-219; 29 C.F.R. pts. 541 and 553.

Procedures and controls

- The CRA workweek shall be designated in writing and changed only prospectively for legitimate operational reasons.
- For nonexempt employees, overtime is generally due after 40 hours in a workweek unless a specific FLSA public-sector exemption or section 7(k) rule lawfully applies.
- Compensatory time for eligible public employees may be used only under a valid agreement/understanding and within statutory accrual limits; accrued comp time shall be used and paid out as required by FLSA.
- Exempt employees are expected to meet job requirements and will be paid on a salary basis consistent with applicable exemption rules.

7.10 Minimum wage and payroll deductions

The CRA shall pay at least the highest applicable federal, Florida or contractually required minimum wage. Florida's constitutional minimum wage schedule and annual notice requirements shall be monitored. Deductions may be made only when lawful and properly authorized and may not unlawfully reduce wages below required levels.

Legal / policy authority: FLSA; Fla. Const. art. X, s. 24; Fla. Stat. s. 448.110.

7.11 Equal pay and compensation

Compensation decisions shall be based on lawful factors such as duties, responsibility, experience, qualifications, performance, market conditions and Board-approved pay structures. The CRA prohibits sex-based unequal pay for substantially equal work and discriminatory compensation practices based on any protected status.

Legal / policy authority: Equal Pay Act; Title VII; ADEA; Fla. Stat. ch. 760.

7.12 Family and Medical Leave Act

The CRA is a covered public agency under the FMLA. Employee eligibility is determined under federal law, including the 12-month service, 1,250-hour and 50-employees-within-75-miles tests unless a special rule applies. Eligible employees will receive up to 12 workweeks of job-protected leave for qualifying reasons and up to 26 workweeks of military caregiver leave in a single 12-month period where applicable.

Legal / policy authority: Family and Medical Leave Act, 29 U.S.C. §§ 2601 et seq.; 29 C.F.R. pt. 825.

Procedures and controls

- The CRA will provide eligibility, rights/responsibilities and designation notices within federal timeframes.

- Employees must provide sufficient information to identify potentially FMLA-qualifying leave; no specific legal phrase is required.
- Certification, recertification, fitness-for-duty and substitution of paid leave shall follow federal rules and CRA leave policy.
- Health coverage and restoration rights will be maintained as required by law; FMLA records will be maintained confidentially for the federal retention period.

7.13 Military leave and USERRA

Employees who serve in the uniformed services are entitled to leave, reemployment, seniority, benefit and anti-discrimination protections as required by USERRA and Florida law. The CRA will not deny employment, retention, promotion or benefits because of protected service or obligation.

Legal / policy authority: USERRA, 38 U.S.C. §§ 4301-4335; applicable Fla. Stat. ch. 115 and other military-leave provisions.

7.14 Jury duty, witness duty, voting and other statutory leave

The CRA shall provide leave and nonretaliation rights required by federal or Florida law for jury service, subpoenaed witness service, military obligations, domestic/sexual violence-related rights where applicable, and other mandated civic or protected activities. Pay status shall follow the specific law and Board-approved leave schedule.

7.15 Attendance and general leave administration

The CRA may establish annual, sick, personal, administrative, bereavement and other nonstatutory leave benefits by Board-approved schedule. Nonstatutory leave may be changed prospectively subject to law, vested rights and applicable agreements. Employees shall follow call-in, certification and approval procedures, but those procedures will be administered so they do not interfere with FMLA, ADA, PWFA, USERRA or other protected rights.

7.16 Personnel records and medical confidentiality

Personnel records are maintained as public records except where a specific exemption applies. Medical, genetic, accommodation and FMLA records shall be kept in separate confidential files with access limited to those with a lawful need to know. Before releasing personnel information, staff shall review applicable exemptions, including exemptions for certain protected employees, family members, personal contact information, medical data, Social Security numbers and security information.

Legal / policy authority: Fla. Stat. ch. 119 and specific exemptions; ADA; FMLA; GINA; HIPAA only to the extent the CRA acts as a covered entity/business associate for the information at issue.

7.17 Standards of conduct

Employees shall perform duties competently, honestly, safely, courteously and impartially; comply with lawful directives and policies; safeguard public funds and information; avoid insubordination, dishonesty, fraud, theft, harassment, threats, retaliation, falsification, conflicts, misuse of time/property, and conduct that materially impairs public service or trust.

7.18 Discipline and due process

Discipline is intended to correct conduct and protect the CRA. Depending on severity, history and legal requirements, corrective action may include coaching, written warning, suspension, demotion or termination. The CRA may skip progressive steps when warranted. Before imposing discipline that could implicate a constitutionally protected property interest, the CRA shall provide the notice and opportunity to respond required by law.

Legal / policy authority: U.S. Const. amend. XIV as applicable; Cleveland Bd. of Educ. v. Loudermill principles; Fla. Stat. ch. 112 where applicable.

Procedures and controls

- Investigations shall gather relevant facts, preserve evidence and provide a fair opportunity to respond.
- Comparators and prior discipline should be reviewed for consistency while recognizing material differences.
- Whistleblower, EEO, wage, leave, safety and other protected activity shall not be treated as misconduct.

7.19 Separation of employment

Separations shall be documented, property recovered, access disabled promptly, final pay processed lawfully, public records preserved, benefits/COBRA notices issued where applicable, and continuing confidentiality/records obligations explained. The CRA does not make deductions from final wages unless lawful. Exit interviews may be used for organizational learning but are not mandatory unless adopted by Board policy.

7.20 Workplace violence, weapons, drugs and alcohol

Threats, violence, intimidation and impairment that jeopardize safety or performance are prohibited. Employees shall report immediate threats to law enforcement/911 and supervisors. Drug/alcohol testing may be conducted only under a lawful, adopted program and applicable constitutional/statutory standards. Firearms and weapons shall be regulated only to the extent permitted by federal and Florida law and any applicable preemption provisions.

7.21 Workplace safety and injury reporting

The CRA will provide a safe workplace, correct recognized hazards, train employees, document incidents and comply with applicable OSHA and Florida workers' compensation obligations. Employees must promptly report injuries, near misses, hazards and unsafe conditions without fear of retaliation.

Legal / policy authority: Occupational Safety and Health Act; 29 C.F.R.; Fla. Stat. ch. 440; applicable public-employer requirements.

7.22 New-hire and payroll reporting

The CRA shall make required federal and Florida tax withholding, unemployment/ reemployment assistance, retirement and new-hire reports, and shall furnish required wage/tax statements within statutory deadlines. Records shall be retained for the longest applicable federal, Florida, audit or grant period.

8. Safety, Security, Risk and Emergency Management

8.1 Risk management

The Executive Director shall maintain reasonable risk controls for facilities, vehicles, events, construction, cyber systems, public interactions and contracted work. Contracts shall allocate risk appropriately and insurance requirements shall be reviewed based on scope and exposure rather than copied mechanically.

8.2 Incident reporting and claims

Accidents, injuries, property damage, data incidents, threats and potential claims shall be reported promptly to the Executive Director and appropriate risk/legal contacts. Employees shall preserve evidence and refrain from admissions of liability or unauthorized settlement commitments.

8.3 Emergency continuity

The CRA shall maintain continuity procedures for essential records, finance, payroll, procurement, communications and project oversight during emergencies. Emergency procurement authority does not waive documentation, budget, grant or after-the-fact approval requirements except to the extent lawfully impracticable during the emergency.

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9. Policy Administration and Enforcement

9.1 Interpretation

The Executive Director administers this manual subject to Board authority and legal counsel. Legal questions, statutory ambiguity, potential conflicts among authorities, employee due-process matters, contested procurements and material grant issues shall be referred to counsel before final action when practicable.

9.2 Delegation

Delegations must be written, limited in scope and duration, and consistent with Board authority. Delegation does not relieve the delegating official of oversight responsibility and may not transfer a nondelegable statutory duty.

9.3 Training and acknowledgments

Employees shall receive orientation and periodic training appropriate to duties, including ethics, public records/Sunshine, cybersecurity, procurement, harassment/EEO, accommodations/leave, timekeeping, grant compliance and safety. Required acknowledgments confirm receipt, not contractual agreement.

9.4 Violations

Violations may result in corrective action, discipline, contract remedies, repayment, referral to law enforcement or ethics authorities, grant disclosure, or other action required by law. Suspected fraud or theft of public funds shall be escalated immediately.

9.5 Annual legal and policy review

At least annually, the Executive Director shall review this manual against current Florida Statutes, federal employment law, wage thresholds, EEOC/DOL regulations, Uniform Guidance, the Town Purchasing Policy, CRA Board resolutions, grant requirements and audit findings, and shall present recommended amendments to the Board.

Appendix A - CRA Procurement Matrix

Issue	2026 CRA rule / control	Primary source
Town purchasing policy	Incorporated by reference; current version controls subject to CRA Board action	Town Resolution 2023-22 and amendments
Role conversion	Mayor, Finance Director and CAO references are treated as Executive Director for CRA procurement administration	CRA-R-2020-9
Board threshold	\$25,000.01 and above under 2023 Town policy unless law/policy is amended or a lower Board requirement applies	Town policy Table 2; CRA Board authority
Quote threshold: up to \$1,000	No quote required by Town table; document reasonableness when prudent	Town policy Table 1
\$1,001-\$2,500	Two documented written quotes	Town policy Table 1
\$2,501-\$7,500	Three documented written quotes	Town policy Table 1
\$7,501-\$25,000	Three documented written quotes	Town policy Table 1
Formal methods	ITB, RFP, RFQ, LOI as appropriate	Town policy Part I, Section II
Public notice	At least Town-policy minimum; longer if statute/grant requires	Town policy formal solicitation section
Exceptions	Sole source, emergency, government contracts/piggyback, certain contractual services, cooperative purchasing, other lawful exceptions	Town policy exception section
CCNA	Use qualifications-based process when current s. 287.055 thresholds/applicability are met	Fla. Stat. s. 287.055
Federal awards	Apply 2 C.F.R. procurement requirements plus Town/CRA rules	2 C.F.R. §§ 200.317-.327
E-Verify vendors	Required contractual compliance for public agency contracts	Fla. Stat. s. 448.095
No splitting	Do not divide annual/known purchases to avoid competition or approval thresholds	Town policy; internal control principle

Appendix B - Employment Law Compliance Matrix

Authority	Primary requirement	Coverage note
Title VII / PDA	Nondiscrimination, harassment, retaliation; pregnancy discrimination	15+ employees generally for Title VII coverage; policy applies regardless where practicable
ADA / ADAAG	Disability nondiscrimination; reasonable accommodation; confidential medical records	15+ employees generally
PWFA	Reasonable accommodation for pregnancy/childbirth/related limitations; anti-retaliation	15+ employees generally
ADEA	Age 40+ discrimination/retaliation	20+ employees generally

GINA	Genetic information discrimination and confidentiality	15+ employees generally
Equal Pay Act	Equal pay for substantially equal work without sex-based disparity	Broad FLSA coverage
FLSA	Minimum wage, overtime, recordkeeping, comp time for public agencies, pump-at-work	Public agencies covered subject to specific exemptions
FMLA	Job-protected family/medical leave, notices, records	Public agency covered; employee eligibility includes 50 employees within 75 miles test
USERRA	Military leave, reemployment, benefits, nondiscrimination	All covered employers, including public employers
Form I-9 / IRCA	Employment eligibility verification and anti-discrimination	All employers
Florida E-Verify	E-Verify new employees; contractor/subcontractor compliance	Public agencies
Florida Civil Rights Act	Florida employment discrimination/retaliation protections	Coverage determined by ch. 760
Florida minimum wage	Pay higher applicable Florida/federal minimum; notices and records	Covered Florida employees
Florida Whistle-blower Act	Protect qualifying disclosures by public employees	Public agencies as defined by statute
Workers' compensation	Coverage, injury reporting, benefits and anti-retaliation	As required by Fla. Stat. ch. 440
Public records	Personnel records generally public subject to specific exemptions	CRA as public agency

This matrix is a compliance index, not an exhaustive statement of every law or eligibility rule. Other laws may apply based on employee count, job duties, funding source, benefit plan, immigration status, military service, protected activity, specific occupation, collective bargaining, grant terms or future amendments.

Appendix C - Required Forms and Checklists

- Procurement requisition and funding certification
- Quote comparison / price reasonableness record
- Sole-source justification
- Emergency procurement justification
- Cooperative/piggyback due-diligence checklist
- Evaluation committee conflict-of-interest statement
- Procurement evaluation score sheet
- Contract routing and legal/risk review checklist
- Federal award procurement checklist and debarment/SAM verification
- Federal subrecipient vs. contractor determination
- Employee policy acknowledgment
- EEO/harassment complaint intake form
- ADA/PWFA accommodation request and interactive-process record (request form optional; oral requests accepted)
- FMLA notices and certifications using current U.S. DOL forms
- I-9 and E-Verify records using current official systems/forms
- Incident / injury / near-miss report
- Exit clearance and property-return checklist
- Annual manual legal-review checklist

Appendix D - Legal Authority Index (Core Authorities)

Topic	Authority
CRA governance	Fla. Stat. ch. 163, Part III, including ss. 163.356, 163.357, 163.367, 163.371, 163.387
Ethics	Fla. Stat. ch. 112, Part III
Sunshine	Fla. Const. art. I, s. 24; Fla. Stat. ch. 286
Public records	Fla. Const. art. I, s. 24; Fla. Stat. ch. 119
Prompt payment	Fla. Stat. ss. 218.70-.80
CCNA	Fla. Stat. s. 287.055 and current s. 287.017 categories
Public construction	Fla. Stat. ss. 255.05, 255.20, 255.099, 255.0991 as applicable
E-Verify	Fla. Stat. s. 448.095; federal Form I-9 requirements
Federal procurement	2 C.F.R. §§ 200.317-.327 and Appendix II
Federal EEO	Title VII, ADA/ADAAA, ADEA, GINA, Equal Pay Act, PDA, PWFA
Wage and hour	FLSA, 29 U.S.C. §§ 201-219; 29 C.F.R. pts. 541, 553
Family/medical leave	FMLA, 29 U.S.C. §§ 2601 et seq.; 29 C.F.R. pt. 825
Military rights	USERRA, 38 U.S.C. §§ 4301-4335
Florida employment	Fla. Stat. ch. 760; s. 448.110; ch. 440; ss. 112.3187-.31895 and other applicable provisions

Legal currency statement: This index was prepared for a 2026 manual using law and official guidance available through August 17, 2026. Because statutes, regulations and agency interpretations change, counsel should verify citations, coverage thresholds and mandatory notices immediately before Board adoption and during each annual review.

Appendix E - Suggested Adoption Resolution Elements

The adoption resolution should, at minimum: (1) identify the manual by title and date; (2) approve and adopt it as CRA policy; (3) reaffirm incorporation of the current Town Purchasing Policy subject to CRA-R-2020-9 or expressly restate the intended role substitutions; (4) provide that controlling law and grant terms supersede conflicting manual provisions; (5) authorize the Executive Director to issue nonmaterial administrative procedures and forms consistent with Board policy; (6) repeal or supersede prior policies only to the extent of conflict; (7) include severability; and (8) establish an effective date.

Because CRA-R-2020-9 predates Town Resolution 2023-22, the Board and CRA Attorney should expressly confirm in the 2026 adoption resolution whether CRA-R-2020-9 is intended to incorporate the 2023 Town Purchasing Policy and future amendments automatically or only as separately ratified. This manual assumes current-policy incorporation for operational consistency but flags the issue for formal legal confirmation.

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Board Adoption / Certification

Adopted by the Town of Eatonville Community Redevelopment Agency Board of Directors by Resolution No. _____ on _____, 2026.

Approval	Signature / Date
CRA Chair	
Executive Director	
Attest / Clerk	
Approved as to legal form and sufficiency	CRA Attorney: _____

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**TOWN OF EATONVILLE
COMMUNITY REDEVELOPMENT AGENCY
APPENDIX C IMPLEMENTATION FORMS &
CHECKLISTS**

2026 Comprehensive Policies and Procedures Manual

PACKAGE INDEX

Document

Procurement Requisition
Funding Certification
Quote Comparison and Price Reasonableness Record
Sole-Source Procurement Justification
Emergency Procurement Justification and After-the-Fact Approval
Cooperative Purchasing / Piggyback Due-Diligence Determination
Evaluation Committee Conflict-of-Interest, Impartiality and Confidentiality Statement
Procurement Evaluation - Individual Score Sheet
Evaluation Committee Consensus Ranking and Final Evaluation Record
Contract Routing, Legal Review, Risk Review and Approval Checklist
Federal Award Procurement Compliance Checklist
SAM.gov Suspension and Debarment Verification Record
Federal Subrecipient vs. Contractor Determination
Employee Receipt and Acknowledgment of CRA Policies and Procedures
EEO / Harassment / Retaliation Complaint Intake Form
ADA / ADAAA / PWFA Accommodation Request and Interactive-Process Record
FMLA Administration Checklist and Forms-Control Record
Form I-9 and E-Verify Compliance Checklist
Employee / Workplace Incident, Injury and Near-Miss Report
Exit Clearance and Property-Return Checklist
Annual Legal, Regulatory and Policy Compliance Review Checklist

Use note. These forms implement Appendix C of the 2026 Town of Eatonville CRA Comprehensive Policies and Procedures Manual. They are administrative tools and must be used with current controlling law, Town Purchasing Policy, CRA Board actions, grant terms, and current official federal/state forms.



PROCUREMENT REQUISITION

C-01 | Version 2026.1

Form Owner

Requesting Program / Executive Director

Related Manual Sections

Sections 4.2, 4.5, 5.1-5.7; Appendix A

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Complete before committing CRA funds or communicating an award. Attach scope/specifications, quotes or solicitation records, funding documentation, and any exception justification. No vendor may begin work before all required approvals, contract/PO issuance, insurance, E-Verify, bonds, and grant conditions are satisfied.

1. Request Identification

Requesting employee / program _____

Project / program name _____

Requested vendor (if known) _____

Requested delivery / start date _____

CRA redevelopment plan objective / project linkage _____

Estimated Total Value	Base Amount	Renewals / Options	Contingency	Total Anticipated Value
-----------------------	-------------	--------------------	-------------	-------------------------

\$

2. Goods / Services / Scope

Describe the business need and required deliverables. Attach detailed scope/specifications when needed.

3. Procurement Method Determination

☐ Up to \$1,000 - no quote required by Town table; reasonableness documented

☐ Two written quotes (\$1,001-\$2,500)

☐ Three written quotes (\$2,501-\$25,000)

☐ Formal ITB

☐ Formal RFP

☐ Formal RFQ / LOI / CCNA

☐ Sole source

☐ Emergency



☐ Cooperative / piggyback

☐ Other lawful exception

Procurement method rationale / solicitation number

4. Required Compliance Screening

- ☐ Budget authority confirmed
- ☐ Aggregate annual vendor spend considered / no splitting
- ☐ Funding restrictions reviewed
- ☐ CRA/Town threshold checked
- ☐ Board approval required
- ☐ E-Verify clause / verification required
- ☐ SAM/debarment check required
- ☐ Insurance reviewed
- ☐ Bonding required
- ☐ Public records / records clause required
- ☐ Cybersecurity / data terms required
- ☐ Federal or state award requirements apply

5. Required Attachments

- ☐ Funding Certification (C-02)
- ☐ Quote Comparison / Price Reasonableness (C-03)
- ☐ Scope/specifications
- ☐ Quotes or solicitation package
- ☐ Sole Source (C-04)
- ☐ Emergency Justification (C-05)
- ☐ Piggyback Due Diligence (C-06)
- ☐ Conflict/score records (C-07/C-08/C-09)
- ☐ Contract Routing (C-10)
- ☐ Federal Procurement Checklist (C-11)
- ☐ SAM Verification (C-12)
- ☐ Other supporting records

Approval / Certification

Name / Signature

Date

Requestor

Program / Project Manager

Fiscal / Budget Review

Executive Director

CRA Board (if required)



FUNDING CERTIFICATION

C-02 | Version 2026.1

Form Owner

Finance / Fiscal Reviewer

Related Manual Sections

Sections 4.1-4.5, 6.1, 6.4

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Use with every material procurement or contract. Identify all funding sources and restrictions before solicitation or commitment. If federal, state, county, bond, or other restricted funds are involved, attach the award or governing terms and identify the most restrictive applicable rule.

1. Transaction

Procurement / requisition number _____

Project / contract _____

Vendor / proposed payee _____

Total anticipated commitment _____

2. Funding Sources

Source	Fund / Account	Award / Grant No.	Amount	Restriction / Period
CRA Trust Fund				
Federal Award				
State Award				
Town / Interlocal				
Other				

3. Fiscal Compliance Certification

- ☐ Expenditure is included in adopted CRA budget
- ☐ Expenditure serves an authorized CRA redevelopment purpose
- ☐ Expenditure is consistent with the adopted redevelopment plan
- ☐ Funds are available and unencumbered
- ☐ No unlawful deficit will result
- ☐ Restricted funds are used only for permitted purposes
- ☐ Period of performance / availability dates permit the cost
- ☐ Required match or cost share is identified
- ☐ Indirect cost treatment is documented when applicable
- ☐ Program income requirements reviewed



- ☐ Capital/equipment restrictions reviewed
- ☐ Nonappropriation or funding-contingency clause required for future-year commitment

4. Grant / Award Conditions

- ☐ No external award funding
- ☐ Federal award - 2 C.F.R. Part 200 applies
- ☐ Federal agency-specific clauses apply
- ☐ State grant procurement requirements apply
- ☐ Davis-Bacon / labor standards review required
- ☐ Build America Buy America review required
- ☐ Section 3 review required
- ☐ Domestic preference / recovered materials review required
- ☐ Subrecipient vs. contractor determination required
- ☐ Grantor preapproval required

Describe material funding conditions, approvals, or exceptions:

Certification

I certify, based on the records reviewed, that the identified funding is presently available and that the transaction may proceed only within the limits and conditions stated on this form. This certification does not replace procurement, legal, grant, or Board approvals.

Approval / Certification	Name / Signature	Date
Prepared by		
Fiscal reviewer		
Program manager		
Executive Director		



QUOTE COMPARISON AND PRICE REASONABLENESS RECORD

C-03 | Version 2026.1

Form Owner

Requesting Program / Procurement File Custodian

Related Manual Sections

Sections 5.1-5.2, 6.2; Appendix A

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Use for informal purchases and whenever price reasonableness should be documented. Quotes must be comparable and identify vendor, date, description, price, and terms. Refresh quotes that exceed the Town policy validity period.

1. Purchase Information

Requisition / project _____

Item / service _____

Estimated value _____

Quote request date _____

Required delivery / performance date

2. Comparable Quote Record

Vendor	Date	Price	Delivery / Term	Meets Scope?	Notes
				☐ Yes ☐ No	
				☐ Yes ☐ No	
				☐ Yes ☐ No	
				☐ Yes ☐ No	

3. Price Reasonableness Basis

- ☐ Adequate competition among comparable quotes
- ☐ Comparison to prior recent purchase adjusted for market conditions
- ☐ Published catalog / market pricing
- ☐ Independent estimate
- ☐ Government / cooperative contract pricing
- ☐ Cost analysis
- ☐ Other documented basis

Explain reasonableness, material differences, and why the selected quote represents best value / lowest responsive option as applicable:



4. Selection

Selected vendor _____

Selected price _____

- ☐ Lowest responsive and responsible quote
- ☐ Higher-priced selection justified by documented best-value factors
- ☐ Only one responsive quote received; reasonableness independently established
- ☐ Exception form attached

Certification

I certify that the comparison is based on materially comparable requirements and that the selected price is reasonable for the CRA's documented need. No quote was altered or omitted for the purpose of steering the award.

Approval / Certification	Name / Signature	Date
Prepared by		
Program / Project Manager		
Executive Director		



SOLE-SOURCE PROCUREMENT JUSTIFICATION

C-04 | Version 2026.1

Form Owner

Requesting Program / Executive Director

Related Manual Sections

Section 5.5; Town Purchasing Policy exceptions

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Sole source is an exception to competition and must be supported by facts showing that only one source can meet the CRA's legitimate need. Convenience, familiarity, preference, urgency created by delay, or a prior relationship alone are insufficient.

1. Proposed Sole Source

Vendor _____

Goods / services _____

Total anticipated value including renewals/options

Requested term _____

Requisition / project _____

2. Basis for Sole Source

- ☐ Unique proprietary item or service available from only one source
- ☐ Compatibility / standardization is essential and alternatives would create documented operational harm
- ☐ Exclusive rights, licensing, data, warranty, or intellectual property constraint
- ☐ Only source capable of meeting mandatory technical / schedule / safety requirement
- ☐ Other lawful basis

Detailed factual justification. Identify the unique requirement and why no reasonable substitute or competing source can satisfy it:

3. Market Due Diligence

- ☐ Internet / market research conducted
- ☐ Manufacturer / distributor status verified
- ☐ Alternative vendors contacted



- ☐ Existing cooperative / government contracts checked
- ☐ Price reasonableness separately documented on C-03

Describe research performed and alternatives considered:

4. Conflict / Integrity Review

- ☐ No employee or Board member has a prohibited financial interest in the vendor
- ☐ No purchase has been split to avoid competition
- ☐ Need was not drafted around a preferred vendor without legitimate technical basis
- ☐ Legal review obtained if unusual statutory or entity-separation issue exists

Certification

I certify that the facts stated are complete and accurate and that, to the best of my knowledge, only the identified source can meet the CRA's legitimate requirement. Approval is limited to the scope, amount, and term stated above.

Approval / Certification	Name / Signature	Date
Requestor		
Technical / Program Reviewer		
Fiscal Review		
Executive Director		
CRA Board / Attorney if required		



EMERGENCY PROCUREMENT JUSTIFICATION AND AFTER-THE-FACT APPROVAL

C-05 | Version 2026.1

Form Owner	Executive Director / Incident Lead
Related Manual Sections	Sections 5.5, 8.3; Town Purchasing Policy emergency provisions
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Emergency purchasing is limited to the goods/services and duration reasonably necessary to address the emergency. Documentation, budget controls, grant rules, and required after-the-fact Board reporting/approval remain applicable except to the extent lawfully impracticable during the emergency.

1. Emergency Event

Date/time emergency identified _____

Location / project _____

Person declaring / authorizing emergency

Vendor used _____

Amount committed / estimated _____

2. Nature of Emergency

- ☐ Immediate threat to life, health, or safety
- ☐ Immediate threat of substantial property damage or loss
- ☐ Critical interruption of essential CRA operations
- ☐ Urgent condition requiring immediate action to preserve grant/project eligibility
- ☐ Other legally supportable emergency condition

Describe facts establishing the emergency and why normal competitive timing could not reasonably be used:

3. Procurement Actions

Date/Time	Action / Purchase	Vendor	Amount	Authorized By
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Date/Time	Action / Purchase	Vendor	Amount	Authorized By

4. Competition / Price Safeguards

- ☐ Multiple vendors contacted to the extent practicable
- ☐ Price reasonableness checked against market / prior pricing
- ☐ Scope limited to immediate emergency need
- ☐ Follow-on / permanent work will be competitively procured if required
- ☐ No personal or prohibited conflict identified

5. After-the-Fact Actions

- ☐ Written justification completed
- ☐ Funding confirmed
- ☐ Purchase order / contract regularized
- ☐ Insurance / E-Verify / grant clauses completed if applicable
- ☐ Board notification / approval scheduled if required
- ☐ Records preserved in procurement file
- ☐ Incident / claim report cross-referenced if applicable

Corrective / follow-up action and Board agenda information:

Approval / Certification	Name / Signature	Date
Emergency Requestor / Incident Lead		
Fiscal Review		
Executive Director		
CRA Board Chair / Board action if required		



COOPERATIVE PURCHASING / PIGGYBACK DUE-DILIGENCE DETERMINATION

C-06 | Version 2026.1

Form Owner	Requesting Program / Procurement Reviewer
Related Manual Sections	Section 5.5; Town Purchasing Policy exceptions
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Complete before using another public entity's competitively awarded contract or an authorized cooperative contract. Confirm legal availability, competitive origin, scope fit, current term, and pricing. Attach the originating solicitation, award, contract, amendments, and authorization to use.

1. Proposed Contract

Originating public entity / cooperative _____

Contract / solicitation number _____

Original award date _____

Current expiration date _____

Proposed CRA vendor _____

CRA purchase amount _____

2. Eligibility and Competition Review

- ☐ Originating procurement was competitively solicited
- ☐ Solicitation method is comparable to CRA/Town requirements
- ☐ Contract expressly permits use by other public entities or cooperative members
- ☐ Vendor has agreed in writing to extend contract terms/pricing to the CRA
- ☐ Contract is currently valid and not expired
- ☐ No material scope change is required
- ☐ CRA need is within the original scope / specifications
- ☐ Pricing methodology applies to the CRA purchase
- ☐ All relevant amendments and extensions were reviewed
- ☐ No prohibited geographic/local preference or grant conflict applies

3. Price / Value Review

- ☐ Contract pricing is fixed / published
- ☐ Discount structure verified
- ☐ Current quote obtained from awarded vendor
- ☐ Price compared to market or recent CRA pricing
- ☐ Shipping, fees, escalation, and optional services reviewed
- ☐ C-03 attached when additional reasonableness documentation is warranted



4. CRA-Specific Compliance

- ☐ Budget and redevelopment purpose confirmed
- ☐ Board approval threshold checked
- ☐ Insurance requirements adequate for CRA risk
- ☐ E-Verify requirements included
- ☐ Public records / audit clauses included
- ☐ Federal award requirements reconciled
- ☐ SAM/debarment checked if federally funded
- ☐ Legal review completed for unusual terms or entity issues

Due-diligence findings / limitations / conditions:

Certification

Based on the records reviewed, the referenced contract is legally and operationally suitable for the proposed CRA purchase, subject to the limitations and approvals stated above.

Approval / Certification	Name / Signature	Date
Prepared by		
Program Manager		
Procurement / Fiscal Review		
Executive Director		
Legal / Board if required		



EVALUATION COMMITTEE CONFLICT-OF-INTEREST, IMPARTIALITY AND CONFIDENTIALITY STATEMENT

C-07 | Version 2026.1

Form Owner

Evaluation Committee Member

Related Manual Sections

Sections 2.2, 2.3, 5.4

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Complete before receiving or reviewing proposer submissions. Update immediately if circumstances change. This form does not replace any disclosure, voting, or recusal requirement imposed by Florida law or applicable local ethics rules.

1. Procurement

Solicitation number / title _____

Committee member _____

Employer / role _____

Date appointed _____

2. Disclosure Questions

Statement	Yes	No / Explain
Conflict of interest in any proposer or known subcontractor.	☐	☐
Relationship with proposer, household, employment, creditor, debtor, investment, gift, or other relationship that may reasonably question my impartiality.	☐	☐
Received a prohibited gift, favor, promise, or benefit from a proposer or person acting for a proposer.	☐	☐
Discussed scoring, ranking, strategy, or confidential procurement information with a proposer outside authorized channels.	☐	☐
Evaluated proposals only under the published criteria and the record presented.	☐	☐
Released my notes, score sheets, emails, and other records as public records.	☐	☐
Complied with Sunshine requirements applicable to the committee and will not engage in ex parte deliberations.	☐	☐
Refrained from disclosing proposer communications to the designated procurement contact.	☐	☐

If any response requires explanation, describe the relationship or circumstance and any proposed mitigation / recusal:



Certification

I understand that an actual or apparent conflict may require disclosure, recusal, removal from the committee, or legal review. I will promptly report any change in circumstances before further participation.

Approval / Certification	Name / Signature	Date
Committee Member		
Procurement / Staff Review		
Legal Counsel if referred		



PROCUREMENT EVALUATION - INDIVIDUAL SCORE SHEET

C-08 | Version 2026.1

Form Owner

Evaluation Committee Member

Related Manual Sections

Section 5.4

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Each evaluator must score independently using only the published criteria. Do not change criteria, weighting, or scoring scales after proposals are opened except through a lawful documented process. Preserve this completed sheet and all evaluation notes.

1. Solicitation / Evaluator

Solicitation number / title _____

Respondent _____

Evaluator _____

Evaluation date _____

2. Published Criteria

Criterion	Weight / Max Points	Evaluator Score	Narrative Basis / Evidence
Qualifications / Experience			
Approach / Work Plan			
Project Team / Capacity			
Past Performance / References			
Price / Cost (if applicable)			
Local / Other lawful criterion (if published)			
Other published criterion			
TOTAL			

3. Responsiveness / Responsibility Observations

☐ Submission appears responsive to mandatory requirements

☐ Required forms / certifications present

☐ Material exceptions or deviations identified

☐ Responsibility concerns identified

☐ Clarification may be needed through authorized procurement contact

Strengths, weaknesses, risks, clarifications, and supporting proposal page references:



Certification

I certify that this score reflects my independent evaluation under the published criteria and was not influenced by undisclosed communications, favoritism, or criteria outside the solicitation.

Approval / Certification	Name / Signature	Date
--------------------------	------------------	------

Evaluator



EVALUATION COMMITTEE CONSENSUS RANKING AND FINAL EVALUATION RECORD

C-09 | Version 2026.1

Form Owner	Procurement Facilitator / Committee Chair
Related Manual Sections	Section 5.4
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Use to document the committee's final public evaluation record after individual scoring and any authorized presentations, discussions, clarifications, or best-and-final offers. Attach all individual score sheets, minutes, attendance, and supporting records.

1. Procurement

Solicitation number / title _____

Evaluation meeting date(s) _____

Committee members present _____

Procurement facilitator _____

2. Final Scoring / Ranking

Rank	Respondent	Individual / Final Score	Key Basis for Ranking	Recommended Action
1				
2				
3				
4				
5				

3. Process Integrity Record

- ☐ Conflict disclosures completed before review
- ☐ Published criteria/weights used without unauthorized change
- ☐ Individual scores completed independently
- ☐ Committee meeting notice / Sunshine requirements satisfied as applicable
- ☐ Proposer communications occurred only through designated contact
- ☐ Clarifications / presentations were handled consistently
- ☐ All evaluation notes and records preserved
- ☐ Funding and due diligence completed before recommendation



Document material committee discussion, tie-breaking, clarifications, deviations, protests/inquiries, or other issues affecting the ranking:

4. Recommendation

- ☐ Recommend award to highest-ranked respondent
- ☐ Recommend negotiations with highest-ranked respondent
- ☐ Recommend short list / interviews
- ☐ Recommend rejection / cancellation with documented basis
- ☐ Other lawful recommendation

Recommended respondent / next action

Approval / Certification	Name / Signature	Date
Committee Chair / Facilitator		
Committee Member		
Committee Member		
Committee Member		
Executive Director		



CONTRACT ROUTING, LEGAL REVIEW, RISK REVIEW AND APPROVAL CHECKLIST

C-10 | Version 2026.1

Form Owner	Contract Manager / Executive Director
Related Manual Sections	Sections 5.6-5.9, 8.1
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Use for new contracts, renewals, material amendments, and change orders. A material change in scope, price, or term requires the same approval level as the original agreement or the higher authority triggered by the amended total. Do not permit work before execution and all prerequisite controls are satisfied.

1. Contract Identification

Contract / amendment title _____

Vendor / counterparty _____

Procurement number _____

Term / renewal options _____

Current amount _____

Amended / total amount _____

Contract manager _____

2. Procurement / Fiscal Review

- ☐ Procurement method and authority documented
- ☐ Requisition and funding certification complete
- ☐ Aggregate value / renewals / options included
- ☐ Required Board approval obtained or scheduled
- ☐ No split purchase / scope expansion to evade competition
- ☐ Price reasonableness / negotiated compensation documented
- ☐ Grant conditions identified

3. Required Contract Terms

- ☐ Clear scope / deliverables / acceptance criteria
- ☐ Compensation and invoicing terms
- ☐ Term, renewal, and termination rights
- ☐ Insurance appropriate to risk
- ☐ Indemnity / limitation terms reviewed
- ☐ Public records and retention
- ☐ Audit / records access
- ☐ E-Verify



- ☐ Ethics / conflicts
- ☐ Confidentiality and data ownership
- ☐ Cybersecurity / breach obligations if applicable
- ☐ Intellectual property / work product
- ☐ Dispute / venue / governing law
- ☐ Funding / nonappropriation if applicable
- ☐ Federal / state award clauses and flow-downs
- ☐ Bonding / retainage / prompt payment if construction

4. Risk / Compliance Review

- ☐ Certificates of insurance verified
- ☐ Licenses / registrations checked
- ☐ SAM/debarment checked if required
- ☐ Background / access requirements addressed
- ☐ Safety requirements addressed
- ☐ Data classification / sensitive information reviewed
- ☐ Property / equipment responsibilities addressed
- ☐ Public construction / CCNA requirements reviewed if applicable
- ☐ Litigation / claims / unusual liability referred to counsel

5. Routing Status

Review	Required?	Completed By / Date	Comments / Conditions
Program / Contract Manager	☐ Yes ☐ No		
Fiscal / Budget	☐ Yes ☐ No		
Procurement	☐ Yes ☐ No		
Risk / Insurance	☐ Yes ☐ No		
Grant / Federal Compliance	☐ Yes ☐ No		
CRA Attorney	☐ Yes ☐ No		
Executive Director	☐ Yes ☐ No		
CRA Board	☐ Yes ☐ No		

Certification

The contract may be released for signature or performance only after all required reviews, conditions, approvals, insurance, bonds, E-Verify documentation, purchase order issuance, and grant prerequisites are complete.



FEDERAL AWARD PROCUREMENT COMPLIANCE CHECKLIST

C-11 | Version 2026.1

Form Owner	Program Manager / Fiscal Owner
Related Manual Sections	Section 6.1-6.4; 2 C.F.R. §§ 200.317-.327 and Appendix II
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Complete for every procurement charged in whole or in part to a federal award. Federal procurement standards supplement Town/CRA rules. When requirements differ, apply the most restrictive lawful rule unless the award or law expressly provides otherwise.

1. Award / Procurement Identification

Federal awarding agency _____

Pass-through entity _____

Assistance Listing / program _____

Award number _____

Period of performance _____

Procurement / contract _____

Federal amount charged _____

2. Pre-Procurement Requirements

- ☐ Allowable cost / budget / period of performance confirmed
- ☐ Written standards of conduct / conflict requirements satisfied
- ☐ Procurement method selected under CRA/Town and federal rules
- ☐ No unnecessary restrictive specification
- ☐ No prohibited geographic preference unless authorized
- ☐ Independent estimate prepared where appropriate
- ☐ Cost or price analysis required / completed
- ☐ Profit negotiation required for noncompetitive procurement / completed
- ☐ Affirmative steps for small/minority/women/veteran/labor-surplus firms considered
- ☐ Domestic preference requirements reviewed
- ☐ Recovered-material requirements reviewed
- ☐ Federal agency-specific procurement rules reviewed

3. Competition / Noncompetitive Basis

- ☐ Full and open competition used
- ☐ Micro/small purchase method used within current federal threshold and CRA/Town rules
- ☐ Sealed bids
- ☐ Competitive proposals



- ☐ Noncompetitive procurement - justification attached
- ☐ Single source
- ☐ Public exigency/emergency
- ☐ Competition determined inadequate after solicitation
- ☐ Federal agency/pass-through authorization obtained if required

4. Contract Clauses / Flow-Downs

- ☐ 2 C.F.R. Part 200 Appendix II clauses included as applicable
- ☐ Termination for cause/convenience
- ☐ Equal Employment Opportunity / construction clauses if applicable
- ☐ Davis-Bacon / Copeland if applicable
- ☐ Contract Work Hours and Safety Standards if applicable
- ☐ Clean Air / Federal Water Pollution Control if applicable
- ☐ Debarment / suspension
- ☐ Byrd Anti-Lobbying if applicable
- ☐ Procurement of recovered materials
- ☐ Domestic preference / Build America Buy America if applicable
- ☐ Section 3 if applicable
- ☐ Federal agency-specific clauses
- ☐ Subcontractor flow-down requirements

5. Award / Administration / Closeout

- ☐ SAM/debarment verification C-12 completed
- ☐ Responsibility determination documented
- ☐ Board / Executive Director approval complete
- ☐ E-Verify and state requirements complete
- ☐ Contract monitoring assigned
- ☐ Invoices tied to allowable deliverables
- ☐ Equipment / property tracking applied if relevant
- ☐ Records retention period documented
- ☐ Audit access preserved
- ☐ Closeout / final deliverables / final payment documented

Federal compliance notes, exceptions, grantor approvals, or special conditions:



**TOWN OF EATONVILLE COMMUNITY REDEVELOPMENT
AGENCY**

2026 POLICY MANUAL | APPENDIX C | C-11

Approval / Certification	Name / Signature	Date
Program Manager		
Fiscal Owner		
Procurement / Compliance Reviewer		
Executive Director		



SAM.GOV SUSPENSION AND DEBARMENT VERIFICATION RECORD

C-12 | Version 2026.1

Form Owner	Procurement / Grant Compliance Reviewer
Related Manual Sections	Sections 5.11, 6.2
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Use for federally funded contracts and other transactions when suspension/debarment verification is required. Verify the exact legal entity and unique entity identifier (UEI) using the current official SAM.gov system. Retain evidence of the search in the procurement/grant file.

1. Entity Information

Legal business name _____
DBA / alternate name _____
UEI _____
CAGE code if applicable _____
Address _____
Proposed contract / purchase _____
Federal award _____

2. Verification

Search Item	Result	Evidence / Date
SAM.gov entity registration	☐ Active ☐ Inactive ☐ Not found	
Exclusions / debarment search	☐ No exclusion found ☐ Potential match	
Exact entity / UEI matched	☐ Yes ☐ No	
Additional principal / owner search if required	☐ Clear ☐ Issue / N/A	

Search performed by _____

Search date/time _____

3. Potential Match / Exception Resolution

- ☐ No potential exclusion identified - proceed subject to other approvals
- ☐ Potential match identified - stop award/payment and refer to grant/procurement/legal staff
- ☐ Federal awarding agency / pass-through entity contacted
- ☐ Written authorization / exception received and attached
- ☐ Entity identity mismatch resolved and documented

Describe any match, resolution, or additional due diligence:



Certification

I certify that I performed the verification using the current official SAM.gov system and retained the search evidence. A clean SAM search does not replace other responsibility, eligibility, E-Verify, licensing, or conflict checks.

Approval / Certification	Name / Signature	Date
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Verifier

Program / Grant Manager

Executive Director if issue referred



FEDERAL SUBRECIPIENT VS. CONTRACTOR DETERMINATION

C-13 | Version 2026.1

Form Owner	Program Manager / Fiscal Owner
Related Manual Sections	Section 6.5
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Complete before issuing a federal pass-through subaward or vendor contract. Classification is based on the substance of the relationship, not the label used by the parties. Document the overall judgment and retain supporting evidence.

1. Relationship

Federal award / program _____

Proposed entity _____

Purpose / scope _____

Amount _____

Period _____

2. Indicators of Subrecipient Status

Indicator	Yes	No	Evidence / Notes
Persons who is eligible to receive federal assistance	☐	☐	
Performance measured against federal program objectives	☐	☐	
Responsibility for programmatic decision-making	☐	☐	
Comply with federal program requirements specified in the award	☐	☐	
Use federal funds to carry out a public purpose rather than provide services for the CRA's own use	☐	☐	

3. Indicators of Contractor Status

Indicator	Yes	No	Evidence / Notes
Sells goods or services within normal business operations	☐	☐	
Sells similar goods/services to many purchasers	☐	☐	
Independently operates in a competitive environment	☐	☐	
Sells goods/services ancillary to the federal program	☐	☐	
Not subject to federal program compliance requirements as a result of the contract, except contract clauses/flow-downs	☐	☐	



4. Determination

- ☐ SUBRECIPIENT - issue subaward with required data elements, conditions, risk assessment, monitoring, and audit follow-up
- ☐ CONTRACTOR - procure and administer under applicable procurement rules
- ☐ AMBIGUOUS / MIXED - refer to legal/grant compliance before execution

Overall analysis and basis for classification:

Approval / Certification

Name / Signature

Date

Prepared by

Fiscal / Grant Reviewer

Executive Director

Legal Counsel if referred



EMPLOYEE RECEIPT AND ACKNOWLEDGMENT OF CRA POLICIES AND PROCEDURES

C-14 | Version 2026.1

Form Owner	Executive Director / HR Designee
Related Manual Sections	Section 9.3
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: This acknowledgment confirms receipt and responsibility to follow applicable CRA policies. It is not a contract of employment, does not guarantee continued employment or benefits, and does not waive any statutory right, immunity, defense, privilege, public-record exemption, or Board authority.

1. Employee Information

Employee name _____

Job title _____

Department / program _____

Hire / effective date _____

2. Acknowledged Materials

- ☐ 2026 Town of Eatonville CRA Comprehensive Policies and Procedures Manual
- ☐ Ethics / conflict-of-interest requirements
- ☐ Public records and Sunshine responsibilities applicable to my role
- ☐ Cybersecurity / acceptable use requirements
- ☐ Procurement rules applicable to my duties
- ☐ EEO / anti-harassment / retaliation policy
- ☐ Accommodation and leave procedures
- ☐ Timekeeping / overtime responsibilities if applicable
- ☐ Safety / incident reporting requirements
- ☐ Grant compliance requirements if applicable
- ☐ Other Board-approved policy: _____

3. Employee Acknowledgment

I acknowledge that I have received access to the policies listed above, have been told where the current official versions are maintained, and understand that I am responsible for asking for guidance before acting when my authority or a requirement is uncertain. I understand that policies may be amended by lawful authority and that controlling law or grant terms supersede inconsistent internal language. I understand that reporting concerns or exercising protected rights is protected from retaliation.

- ☐ I received an opportunity to ask questions.
- ☐ I understand how to report ethics, harassment, safety, wage, grant, or other compliance concerns.
- ☐ I understand that required acknowledgments confirm receipt, not contractual agreement.



Approval / Certification	Name / Signature	Date
Employee		
Supervisor / HR Designee		



EEO / HARASSMENT / RETALIATION COMPLAINT INTAKE FORM

C-15 | Version 2026.1

Form Owner

Designated HR / Investigator / Executive Director

Related Manual Sections

Sections 2.5, 7.1-7.2

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Use to document a report of discrimination, harassment, retaliation, or related conduct. A written form is not required to make a complaint. Supervisors who observe or receive a complaint must promptly route it to the designated investigator/HR authority and may not screen it out as informal.

1. Intake Information

Complainant / reporting person _____

Preferred contact _____

Employee / applicant / contractor / other status _____

Date received _____

Received by _____

Method received (oral, email, written, other) _____

2. Nature of Concern

- ☐ Race / color
- ☐ Religion
- ☐ Sex / sexual harassment
- ☐ Pregnancy / childbirth / related condition
- ☐ Sexual orientation / gender identity
- ☐ National origin
- ☐ Age
- ☐ Disability / accommodation
- ☐ Genetic information
- ☐ Marital status
- ☐ Military / veteran status
- ☐ Equal pay / compensation
- ☐ Retaliation
- ☐ Other protected status / activity

3. Reported Conduct

Person(s) accused / involved _____



Work location / program _____

Date(s) / frequency _____

Describe what occurred, including words/actions, context, and why the conduct is believed to be discriminatory, harassing, or retaliatory:

Witnesses and documents / messages / recordings / other evidence:

4. Immediate Safety / Interim Measures

- ☐ No immediate safety concern reported
- ☐ Immediate safety / threat concern - escalate to law enforcement / security as appropriate
- ☐ Schedule / reporting-line adjustment considered
- ☐ No-contact or workspace measure considered
- ☐ Leave / telework / other interim support considered
- ☐ Preservation notice / evidence hold initiated

5. Intake Notices

- ☐ Nonretaliation explained
- ☐ Confidentiality limits explained
- ☐ Public-record implications explained as applicable
- ☐ Investigation process generally explained
- ☐ Employee offered support / accommodation process if relevant

6. Routing / Investigation Assignment

Assigned investigator _____

Date assigned _____

Target initial follow-up date _____

Legal counsel notified / reason _____



Approval / Certification

Name / Signature

Date

Intake Person

Complainant / Reporting Person
(optional acknowledgment of accuracy,
not required to proceed)

Investigator



ADA / ADA AAA / PWFA ACCOMMODATION REQUEST AND INTERACTIVE-PROCESS RECORD

C-16 | Version 2026.1

Form Owner	Executive Director / HR Designee
Related Manual Sections	Sections 7.3-7.5
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Accommodation requests may be oral or written and need not use special words. Use this form to document the request and interactive process; do not delay action because an employee did not complete the form. Request medical information only when permitted, job-related, and necessary. Keep medical/accommodation records separate from the general personnel file.

1. Request Information

Employee / applicant _____
Position / applied position _____
Date request first communicated _____
Person receiving request _____
Preferred contact _____

2. Type of Request

- ☐ Disability-related accommodation (ADA/ADA AAA)
- ☐ Pregnancy / childbirth / related medical condition (PWFA)
- ☐ Lactation / pump-at-work space or break arrangement
- ☐ Temporary limitation / restriction
- ☐ Religious or other accommodation - route under applicable policy/law

Describe the work limitation / barrier and accommodation requested. Do not require diagnosis details beyond what is necessary to understand the functional limitation:

3. Essential Functions / Work Context

Identify essential functions and the specific task(s), schedule, environment, or process affected:



4. Interactive Process

Date

Participants

Issue / Information Discussed

Accommodation Option / Follow-
Up

5. Options Considered

- ☐ Equipment / ergonomic change
- ☐ Modified schedule / breaks
- ☐ Remote work / location change where feasible
- ☐ Job restructuring / temporary duty modification
- ☐ Temporary suspension of certain duties where required by PWFA
- ☐ Leave
- ☐ Reassignment to vacant position where required
- ☐ Parking / uniform / seating / water / restroom access
- ☐ Private lactation space and reasonable break time
- ☐ Other

6. Documentation

- ☐ No medical documentation needed
- ☐ Limited documentation requested and legally permissible
- ☐ Documentation received and stored separately
- ☐ Request for documentation paused / narrowed after review
- ☐ Confidential medical information not placed in general personnel file

7. Decision / Implementation

- ☐ Approved as requested
- ☐ Alternative accommodation approved
- ☐ Temporary accommodation pending further review
- ☐ Denied - undue hardship / direct threat / not legally required; legal review completed
- ☐ Closed because no accommodation needed / request withdrawn

Decision rationale, effective date, duration, responsible implementer, and review date:



Certification

The CRA will engage in a timely, good-faith interactive process and will not retaliate against a person for requesting or using a lawful accommodation. Nothing on this form should be interpreted to require documentation or leave where applicable law prohibits that requirement.

Approval / Certification	Name / Signature	Date
Employee / Applicant (optional)		
HR / Designee		
Supervisor / Implementer		
Legal Review if required		



FMLA ADMINISTRATION CHECKLIST AND FORMS-CONTROL RECORD

C-17 | Version 2026.1

Form Owner

Executive Director / HR Designee

Related Manual Sections

Section 7.12

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Use this checklist to administer potentially FMLA-qualifying leave. Use the current official U.S. Department of Labor FMLA notices and certification forms; do not rely on outdated local copies. The CRA is a covered public agency, but employee eligibility must be determined under federal law, including applicable service, hours-worked, and 50-employees-within-75-miles tests.

1. Employee / Leave Event

Employee _____

Position _____

Date notice/request received _____

First date absent / expected leave _____

Potential qualifying reason _____

2. Eligibility Review

- ☐ 12 months of service requirement reviewed
- ☐ 1,250 hours of service requirement reviewed
- ☐ 50 employees within 75 miles test reviewed
- ☐ Employee eligible
- ☐ Employee not eligible - written eligibility notice provided
- ☐ Eligibility uncertain - legal/HR review requested

3. Required Notices / Forms Control

Item	Current Official Form / Notice	Date Provided / Received	Status / Notes
General FMLA workplace notice	Current DOL poster		
Eligibility / Rights & Responsibilities Notice	Current DOL form / approved equivalent		
Medical Certification - Employee	Current DOL certification form if applicable		
Medical Certification - Family Member	Current DOL certification form if applicable		
Military Family Leave Certification	Current DOL form if applicable		
Designation Notice	Current DOL designation form / approved equivalent		



Item	Current Official Form / Notice	Date Provided / Received	Status / Notes
------	--------------------------------	--------------------------	----------------

Fitness-for-Duty Notice / Certification	As lawfully required		
--	----------------------	--	--

4. Administration

- ☐ Leave entitlement / 12-month measuring method confirmed
- ☐ Intermittent / reduced schedule requirements reviewed
- ☐ Substitution of paid leave applied consistently and lawfully
- ☐ Health benefit continuation addressed
- ☐ Premium payment process communicated
- ☐ Recertification timing reviewed
- ☐ Return-to-work / restoration rights reviewed
- ☐ ADA/PWFA accommodation process considered where leave overlaps
- ☐ USERRA / workers compensation / other leave coordination reviewed
- ☐ FMLA records stored confidentially and retained for required period

5. Designation / Closeout

FMLA leave designated from / to _____

Total FMLA leave used in measuring period _____

Notes regarding intermittent leave, recertification, restoration, disputes, or coordination with other protections:

Approval / Certification	Name / Signature	Date
--------------------------	------------------	------

HR / Leave Administrator

Employee acknowledgment of receipt
where appropriate

Supervisor notified of work-status
restrictions only



FORM I-9 AND E-VERIFY COMPLIANCE CHECKLIST

C-18 | Version 2026.1

Form Owner	HR / Payroll Designee
Related Manual Sections	Section 7.7
Retention	Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Use the current official federal Form I-9 and E-Verify systems/forms. This checklist is a control record only and does not replace the official I-9. Administer verification without discrimination based on citizenship, immigration status, or national origin; do not demand specific documents.

1. Employee

Employee name _____

Hire date _____

Position _____

Work location _____

HR verifier _____

2. Form I-9 Control

- ☐ Current official Form I-9 version used
- ☐ Section 1 completed by employee no later than required federal deadline
- ☐ Section 2 completed by employer within required federal timeframe
- ☐ Employee chose acceptable documentation; no specific document demanded
- ☐ Original documents physically examined or approved alternative procedure used if legally available
- ☐ Document information entered accurately
- ☐ Reverification / Supplement B diaried if applicable
- ☐ Corrections made using compliant method; original information not obscured
- ☐ I-9 stored securely and separately / access restricted
- ☐ Retention date calculated under federal rule

3. E-Verify Control

- ☐ E-Verify case created within required timeframe
- ☐ Employee information matches Form I-9
- ☐ Case result: Employment Authorized
- ☐ Tentative Nonconfirmation / mismatch handled under current E-Verify procedure
- ☐ Employee given required notice and opportunity to act
- ☐ No adverse action taken while protected contest period pending
- ☐ Final case status recorded and case closed
- ☐ Required Florida public-agency E-Verify documentation retained



4. Non-Discrimination Review

- ☐ No document abuse / over-documentation
- ☐ No citizenship-status discrimination
- ☐ No national-origin discrimination
- ☐ No premature E-Verify use before hire
- ☐ No selective verification based on appearance, accent, origin, or perceived citizenship

Issue / correction / follow-up notes:

Approval / Certification

Name / Signature

Date

HR / Authorized Representative

Secondary Review if correction /
mismatch



EMPLOYEE / WORKPLACE INCIDENT, INJURY AND NEAR-MISS REPORT

C-19 | Version 2026.1

Form Owner

Employee / Supervisor / Risk Contact

Related Manual Sections

Sections 7.21, 8.2

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Report injuries, near misses, hazards, property damage, data incidents, threats, and potential claims promptly. For emergencies call 911 or appropriate emergency services first. Preserve evidence and do not make unauthorized admissions of liability or settlement commitments.

1. Incident Identification

Date / time _____

Location _____

Reported by _____

Employee(s) / person(s) involved _____

Supervisor _____

Date/time reported _____

2. Incident Type

- ☐ Employee injury / illness
- ☐ Public / visitor injury
- ☐ Near miss
- ☐ Unsafe condition / hazard
- ☐ Vehicle incident
- ☐ Property damage / loss / theft
- ☐ Workplace violence / threat
- ☐ Cyber / data / privacy incident
- ☐ Construction / contractor incident
- ☐ Other potential claim

3. Description

Describe what happened, sequence of events, work being performed, conditions, equipment, and immediate actions taken:



4. Injury / Medical Information

- ☐ No injury reported
- ☐ First aid only
- ☐ Medical evaluation / treatment sought
- ☐ Emergency transport
- ☐ Workers compensation notice initiated
- ☐ Return-to-work restriction / accommodation follow-up needed

Body part / nature of injury (if applicable) _____

5. Witnesses / Evidence

Witness / Source	Contact	Statement / Evidence Preserved

- ☐ Photos / video preserved
- ☐ Equipment / documents preserved
- ☐ Security / IT logs preserved
- ☐ Contractor / vendor notified
- ☐ Police / fire report number obtained
- ☐ Litigation / records hold considered

6. Supervisor / Risk Follow-Up

Immediate corrective action and root-cause / prevention measures:

- ☐ Risk / insurance notified
- ☐ Legal counsel notified
- ☐ Workers compensation carrier / administrator notified



- ☐ OSHA / regulatory reporting evaluated
- ☐ Public records / confidentiality issues reviewed
- ☐ Training / policy change recommended

Approval / Certification	Name / Signature	Date
Reporting Person		
Supervisor		
Risk / HR Review		
Executive Director		



EXIT CLEARANCE AND PROPERTY-RETURN CHECKLIST

C-20 | Version 2026.1

Form Owner

Supervisor / HR / IT / Finance

Related Manual Sections

Section 7.19

Retention

Retain with the applicable official CRA record in accordance with the current Florida records-retention schedule, grant requirements, litigation/audit holds, and the 2026 Manual.

Instructions: Complete for resignations, retirements, layoffs, terminations, end of temporary assignments, and other separations. Preserve public records, disable access promptly, recover CRA property, process final pay lawfully, and issue required benefit/COBRA notices where applicable.

1. Separation Information

Employee _____

Position _____

Supervisor _____

Separation type _____

Last day worked _____

Effective separation date _____

Forwarding contact / address if provided

2. Property Return

Item	Issued / ID	Returned	Condition / Action
Keys / access cards		☐ Yes ☐ N/A	
Laptop / tablet / phone		☐ Yes ☐ N/A	
P-card / fuel card		☐ Yes ☐ N/A	
Vehicle / equipment		☐ Yes ☐ N/A	
Files / records / documents		☐ Yes ☐ N/A	
Other CRA property		☐ Yes ☐ N/A	

3. Access / Records / Security

- ☐ Email / network access disabled at appropriate time
- ☐ MFA tokens / remote access disabled
- ☐ Shared passwords / credentials changed if necessary
- ☐ CRA files transferred to authoritative repository
- ☐ Public records preserved / retention reviewed



- ☐ Litigation / audit / public records holds preserved
- ☐ Personal copies of confidential / exempt records addressed
- ☐ Vendor / system administrator access removed

4. Payroll / Benefits / Administrative Closeout

- ☐ Final time / leave submitted and approved
- ☐ Final pay reviewed for lawful deductions only
- ☐ Accrued leave payout handled under policy/law
- ☐ Direct deposit / payroll status closed
- ☐ Benefits termination processed
- ☐ COBRA / continuation notices issued if applicable
- ☐ Retirement / pension notification processed
- ☐ Expense advances / reimbursements reconciled
- ☐ P-card transactions reconciled
- ☐ Outstanding travel / procurement matters transferred

5. Continuing Obligations / Exit Information

- ☐ Continuing public-record / confidentiality obligations explained
- ☐ Ethics / post-employment restrictions referred to counsel if applicable
- ☐ Records or property not returned documented for follow-up
- ☐ Exit interview offered / completed if used
- ☐ Contact for final tax forms / benefits questions provided

Outstanding matters / recovery plan / notes:

Approval / Certification

Name / Signature

Date

Employee (if available)

Supervisor

IT / Records

Finance / Payroll

HR / Executive Director



ANNUAL LEGAL, REGULATORY AND POLICY COMPLIANCE REVIEW CHECKLIST

C-21 | Version 2026.1

Form Owner	Executive Director / CRA Attorney
Related Manual Sections	Section 9.5; Appendices A-D
Retention	Retain permanently with annual policy-review records and Board amendment history, subject to applicable records schedules.

Instructions: Complete at least annually and whenever material law, grant requirements, Town purchasing policy, CRA governance, audit findings, or operating conditions change. This checklist supports, but does not replace, legal review. Verify current official statutes, regulations, monetary thresholds, notices, forms, and agency guidance before recommending amendments.

1. Review Cycle

Review year _____

Review initiated _____

Review completed _____

Lead reviewer _____

CRA Attorney / legal reviewer _____

Board meeting / resolution for amendments _____

2. Governance / Florida Public Law

Review Area	Verified Current?	Change / Action Needed
CRA governance - Fla. Stat. ch. 163, Part III	☐ Yes ☐ No	
Public Records - Fla. Stat. ch. 112, Part III	☐ Yes ☐ No	
Open Sunshine / public meetings - Fla. Stat. ch. 286	☐ Yes ☐ No	
Public records / retention - Fla. Stat. ch. 119 and schedules	☐ Yes ☐ No	
CRA annual report / website / audit requirements	☐ Yes ☐ No	
Timely payment	☐ Yes ☐ No	
Public construction / bonds / retainage / preferences	☐ Yes ☐ No	

3. Procurement / Contracting

Review Area	Verified Current?	Change / Action Needed
Town Purchasing Policy / Resolution 2023-22 and amendments	☐ Yes ☐ No	
CRA-R-2020-9 / role conversion and Board thresholds	☐ Yes ☐ No	



Review Area	Verified Current?	Change / Action Needed
note / formal solicitation thresholds	☐ Yes ☐ No	
CNA - s. 287.055 and current s. 287.017 categories	☐ Yes ☐ No	
Verify contractor requirements - s. 448.095	☐ Yes ☐ No	
card / petty cash / surplus procedures	☐ Yes ☐ No	

4. Federal / Grant Compliance

- ☐ 2 C.F.R. §§ 200.317-.327 reviewed for amendments
- ☐ 2 C.F.R. Part 200 Appendix II contract clauses reviewed
- ☐ Federal procurement thresholds / agency guidance checked
- ☐ SAM.gov / debarment procedures current
- ☐ Domestic preference / recovered materials / BABA reviewed
- ☐ Davis-Bacon / Copeland / CWHSSA updates reviewed
- ☐ Section 3 / program-specific requirements reviewed
- ☐ Grant-specific manuals / pass-through terms reviewed
- ☐ Subrecipient monitoring procedures reviewed

5. Employment / HR Compliance

- ☐ Title VII / PDA / EEOC guidance reviewed
- ☐ ADA / ADAAA updates reviewed
- ☐ PWFA / 29 C.F.R. pt. 1636 reviewed
- ☐ ADEA / GINA / Equal Pay Act reviewed
- ☐ FLSA wage, overtime, exemption, comp-time, pump-at-work rules reviewed
- ☐ Florida minimum wage / annual notice updated
- ☐ FMLA regulations / DOL forms / poster current
- ☐ USERRA / military leave requirements reviewed
- ☐ I-9 form / USCIS handbook / E-Verify procedure current
- ☐ Florida E-Verify statute reviewed
- ☐ Florida Civil Rights Act reviewed
- ☐ Florida whistleblower law reviewed
- ☐ Workers compensation / safety requirements reviewed
- ☐ Required federal and Florida posters current

6. Operational / Risk / Records Review

- ☐ Cybersecurity / AI / data-sharing practices reviewed
- ☐ Insurance requirements aligned to current risk exposures
- ☐ Incident reporting / emergency continuity reviewed
- ☐ Records retention schedules and legal holds reviewed



- ☐ Training completion / acknowledgments reviewed
- ☐ Audit findings / management letters incorporated
- ☐ Board resolutions / delegations / organizational changes incorporated
- ☐ Forms C-01 through C-20 reviewed for currency

7. Amendment Log / Recommendations

Manual Section / Form	Issue / Source of Change	Recommended Amendment	Owner / Due Date

Certification

The reviewers certify that the listed authorities and operational changes were reviewed using current official sources to the extent practicable. Material changes will be presented to the CRA Board for conforming amendments; nonmaterial administrative updates may be implemented only within delegated authority.

Approval / Certification	Name / Signature	Date
Executive Director		
CRA Attorney / General Counsel		
Fiscal / Procurement Reviewer		
HR / Administrative Reviewer		
Board Chair acknowledgment		