

R E S O L U T I O N
NUMBER 2025-

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF CHARLOTTE COUNTY, FLORIDA, APPROVING AND ADOPTING THE COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR) AND MITIGATION (CDBG-MIT) SUPPLEMENTAL POLICY MANUAL; AUTHORIZING THE COUNTY ADMINISTRATOR OR HIS OR HER DESIGNEE TO APPROVE FUTURE REVISIONS TO THE SUPPLEMENTAL POLICIES; AND PROVIDING AN EFFECTIVE DATE.

RECITALS

WHEREAS, the Charlotte County Board of County Commissioners (Board) has the authority to apply for and receive grants from federally funded programs, administered by the State of Florida; and

WHEREAS, the State of Florida has been allocated federal funding to support long-term disaster recovery through the Community Development Block Grant - Disaster Recovery (CDBG-DR) and Community Development Block Grant – Mitigation (CDBG-MIT) appropriation; and

WHEREAS, CDBG-DR and CDBG-MIT funding may be used for eligible infrastructure activities that address unmet needs resulting from a declared disaster or that benefit the low-to moderate-income community; and

WHEREAS, Charlotte County has applied for and anticipates receiving CDBG-DR and CDBG-MIT grant funding in response to Hurricanes Debbie, Idalia, Helene, and Milton; and

WHEREAS, CDBG-DR and CDBG-MIT programs require the adoption of supplemental policies that specifically reference Community Development Block Grant activities; and

WHEREAS the adoption of supplemental policies ensures compliance with U.S. Department of Housing and Urban Development (HUD) and FloridaCommerce program guidelines; and

WHEREAS, authorizing the County Administrator, or his/her designee, to approve future revisions to the supplemental policies, as required by program or regulatory updates, serves the best interests of the citizens of Charlotte County.

NOW, THEREFORE, BE IT RESOLVED by the Board of County Commissioners of Charlotte County, Florida:

1. The Board hereby approves and adopts the Community Development Block Grant Disaster Recovery (CDBG-DR) & Mitigation (CDBG-MIT) Supplemental Policy Manual attached hereto.
2. The County Administrator, or his/her designee, is hereby authorized to approve revisions to the policies, as required by program or regulatory updates.
3. This Resolution shall be effective upon adoption.

PASSED AND DULY ADOPTED this 28th day of October 2025.

ATTEST:
Roger D. Eaton, Clerk of the
Circuit Court and Ex Officio Clerk of
the Board of County Commissioners

BOARD OF COUNTY COMMISSIONERS
OF CHARLOTTE COUNTY, FLORIDA

By: _____
Deputy Clerk

By: _____
Joseph M. Tiseo, Chairman

APPROVE AS TO FORM AND
LEGAL SUFFICIENCY:

By: _____
Janette S. Knowlton, County Attorney
LR25-1023 _____

Charlotte County, FL
Community Development Block Grant
Disaster Recovery



Supplemental Policy Manual



Introduction

These supplemental policies are intended to complement existing Charlotte County policies and procedures. They apply specifically to activities funded in whole or in part with Community Development Block Grant (CDBG) resources, including CDBG-Disaster Recovery (CDBG-DR) and CDBG-Mitigation (CDBG-MIT) allocations.

The purpose of this manual is to establish minimum standards for compliance with federal, state, and local requirements while providing transparency, accountability, and effective program management. Each chapter sets forth written policies and procedures designed to ensure consistency, safeguard public resources, and guide staff and partners in the administration of CDBG-funded activities.

These policies cover financial management, procurement, citizen participation, fair housing, quality assurance, anti-fraud measures, and related program requirements. They will be applied to all CDBG projects undertaken by Charlotte County and its subrecipients.

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Chapter 1: Citizen Participation Plan

I. Purpose

This Citizen Participation Plan outlines how Charlotte County will ensure meaningful public involvement in the development and submission of its Community Development Block Grant–Disaster Recovery (CDBG-DR) infrastructure application. The Plan complies with:

- Title I of the Housing and Community Development Act of 1974, as amended;
- 24 CFR Part 570, Subpart I (State CDBG Program);
- The citizen participation procedures required by FloridaCommerce, which administers the CDBG-DR program in Florida.

This Plan is designed to meet the minimum federal and state requirements for public engagement in disaster recovery funding while providing transparency and accessibility to Charlotte County residents.

II. Public Notice and Comment Procedure

Prior to submitting its CDBG-DR infrastructure application, Charlotte County will:

- Publish a public notice in a local newspaper of general circulation, announcing the intent to apply for CDBG-DR infrastructure funding;
- Include a summary of the proposed projects and estimated funding amounts;
- Allow at least a 14-day public comment period beginning on the date the notice is published;
- Post the public notice on the County’s website during the entire 14-day comment period;
- Accept written public comments submitted by mail, email, or in person to the contact designated in the notice.

The notice will include the following statement to meet nondiscrimination and accessibility requirements: “A FAIR HOUSING/EQUAL OPPORTUNITY/HANDICAP ACCESS JURISDICTION”

This statement affirms Charlotte County’s commitment to civil rights, inclusion, and accessibility.

III. How to Submit Public Comments

During the 14-day public comment period, Charlotte County will accept comments through the following methods:

- **Email:**
Comments may be sent to: CDBG@CharlotteCountyFL.gov



- **Mail or In-Person Drop-Off:**
Charlotte County Human Services – Neighborhood Services Division
Attn: CDBG Program Coordinator
21500 Gibraltar Drive, Unit 1
Port Charlotte, FL 33952
- **Phone (with written transcription by staff):**
Call 941-833-6500 during normal business hours. Staff will document the comment in writing for inclusion in the record.

All comments must be received by the close of business on the 14th day following publication of the notice.

IV. Review and Consideration of Public Comments

- All timely comments will be **logged and reviewed** by County staff.
- A **summary of public comments and the County's responses** will be prepared and included in the application to FloridaCommerce.
- The County will **consider revisions to the proposed application** if comments identify valid concerns or opportunities for improvement.
- The comment summary will be available to the public upon request.

V. Accessibility and Nondiscrimination

Charlotte County is committed to ensuring participation from all residents, including:

- **Persons with disabilities:** Public notices will include contact information to request accommodations or auxiliary aids under the Americans with Disabilities Act (ADA).
- **Limited English Proficiency (LEP) individuals:** Upon request, translation services will be provided to ensure meaningful access.
- **Hearing or speech impaired:** The County will provide access through the Florida Relay Service (TDD/TTY 711 or 941-743-1234).

All physical meeting locations, if applicable, will be ADA-compliant.

VI. Complaint Procedures

Written complaints regarding the CDBG-DR program or participation process may be submitted to:

Charlotte County Human Services Department

Attn: CDBG Program Coordinator
21500 Gibraltar Drive, Unit 1
Port Charlotte, FL 33952
Email: CDBG@CharlotteCountyFL.gov
Phone: 941-833-6500



Charlotte County will provide a written response within 15 working days, when practicable.

VII. Compliance

This Plan fulfills the applicable citizen participation requirements in:

- 24 CFR § 570.486(a) – State-administered CDBG programs
- HUD Federal Register Notices for CDBG-DR
- FloridaCommerce CDBG-DR guidance, requiring public notice, a 14-day comment period, and inclusion of public input in the application record

Charlotte County will maintain documentation of compliance, including proof of publication, copies of all comments, responses, and any resulting revisions.



Chapter 2: Citizen Complaint Policy

Purpose and Scope

Intent: This policy establishes a formal process for Charlotte County residents to submit and resolve complaints related to the Community Development Block Grant (CDBG) program. It is intended to ensure transparency, accountability, and public participation in compliance with all applicable federal and state requirements. The policy is grounded in Title I of the Housing and Community Development Act of 1974, as amended, and implements the citizen participation and complaint-handling provisions of 24 CFR Part 570 (CDBG regulations) and 2 CFR Part 200 (Uniform Administrative Requirements). It also satisfies the requirements of the Florida Small Cities CDBG Program as authorized by Chapter 290, Florida Statutes (Florida Small Cities CDBG Act) and implemented by Rule 73C-23, Florida Administrative Code, and the guidelines of FloridaCommerce (Florida Department of Commerce) for CDBG competitive applications.

Scope: This policy applies solely to citizen complaints, grievances, or inquiries regarding Charlotte County's CDBG-funded projects and activities. It covers all stages of the CDBG program, including planning, implementation, and closeout of CDBG projects. Complaints unrelated to the CDBG program (for example, general county services or other grant programs) are outside the scope of this policy and should be directed to the appropriate agency. Charlotte County will ensure that all citizens, particularly low- and moderate-income persons affected by CDBG activities, have the opportunity to voice concerns and receive timely, fair responses. The County's elected officials and staff shall administer this policy in a manner consistent with the legal authorities cited above and shall not restrict or impede the public's right to participate in and scrutinize the CDBG program.

Submission of Complaints

How to File a Complaint: Charlotte County encourages citizens to submit CDBG-related complaints or grievances through any of the following methods. The County will accept both written and oral complaints, and will assist individuals in documenting oral complaints in writing to ensure a clear record. In all cases, the complainant should provide as much detail as possible regarding the issue (dates, location, persons involved, and any supporting information) to facilitate investigation and resolution. The County has designated the CDBG Program Coordinator in the Human Services Department (Neighborhood Services Division) as the primary point of contact for CDBG complaints. Complaints may be submitted by:

- **In Writing (Mail or In-Person):** Deliver or mail written complaints to the Charlotte County Human Services Department – Neighborhood Services Division, Attn: CDBG Program Coordinator. Address: 21500 Gibraltar Drive, Unit 1, Port Charlotte, FL 33952. Office hours are Monday through Friday, 8:00 AM to 5:00 PM (excluding holidays). This office will accept hand-delivered letters or forms, as well as mailed correspondence.
- **By Email:** Submit complaints via email to the CDBG Program Coordinator at CDBG@CharlotteCountyFL.gov. Note: Under Florida's Public Records Law (Chapter



119, F.S.), email communications to the County are public records; if you do not wish to disclose your email address, you may use an alternative method of submission.

- **By Telephone:** Call the Charlotte County Neighborhood Services Division at 941-833-6500 to submit a complaint by phone. The CDBG Program staff will either address the issue directly or transcribe your concerns into a written complaint for further action.
- **In Person:** Citizens may also visit the Human Services Department – Neighborhood Services Division at the above address to speak with a staff member in person. Staff will provide a standard complaint form if needed and assist in documenting the complaint in writing.

Acknowledgment of Receipt: Regardless of submission method, the County will provide an acknowledgment of the complaint. If a complaint is made in person or by phone, staff will acknowledge it during the conversation and document the date and content. If a complaint is received by mail or email, a written or email reply acknowledging receipt will be sent to the complainant within five (5) business days. The acknowledgment will include the date the complaint was received, a tracking/reference number (if applicable), the name and contact information of the staff member or program coordinator assigned to review the complaint, and an expected timeframe for response.

Information to Include: To expedite processing, a complainant should ideally include their name, preferred contact information (mailing address, phone, or email), and a clear description of the concern. However, anonymous complaints will be accepted and investigated to the extent feasible. If a complaint is submitted anonymously or without contact information, the County will still investigate the issue but cannot provide a direct response to the complainant.

Timely Response and Resolution

Charlotte County will investigate and respond to all CDBG program complaints in a prompt and fair manner. The following timeline standards shall apply:

- **Substantive Response Within 15 Working Days:** The County will provide a written answer addressing the complaint's merits within fifteen (15) working days of receiving a written complaint, where practicable. The substantive response will summarize the County's understanding of the issue, the findings of any investigation, and the proposed resolution or action to be taken. If the complaint involves a decision (for example, eligibility for a CDBG-funded benefit), the response will state whether that decision is upheld or modified and explain the reasons. This written response will be mailed or emailed to the complainant (or made available for pick-up) and filed in the complaint records.
- **Interim Updates if Delayed:** If a full resolution cannot be provided within 15 working days (for example, because the matter is complex or requires additional investigation, a public hearing, or Board action), the County will send an interim communication to the complainant by the 15th working day. This interim response will acknowledge the ongoing review, explain the reason for delay, and provide an updated estimate of when a final response will be ready. The goal is to resolve most complaints as quickly as



possible, typically no later than within 30 calendar days, unless extenuating circumstances require more time.

- **Resolution Actions:** In its response, the County will detail any corrective actions or remedies it will undertake if the complaint is found valid. Possible resolutions may include: arranging a meeting with the complainant to discuss and resolve the issue; correcting an error or oversight in program administration; providing a service or accommodation that was previously denied; implementing disciplinary action or additional training for staff; or other appropriate adjustments to CDBG activities or procedures. The response will also inform the complainant of their right to pursue appeal if they are dissatisfied with the outcome.

Charlotte County is committed to good faith resolution of issues. Even after a formal response is issued, if new information or concerns come to light, the County will review and, if necessary, re-open the matter to ensure fairness. All resolutions will be consistent with CDBG regulations and County policies. The complainant will not be asked to waive any rights as a condition of resolution.

Appeals Process

If a complainant is dissatisfied with the County's response or proposed resolution, or if the complainant believes the issue has not been adequately addressed, an appeal may be pursued. The following appeal process shall apply:

1. **Program Coordinator Review:** The complainant may submit a written appeal to the CDBG Program Coordinator requesting reconsideration. Additional documentation or clarification should be included. The Program Coordinator will review the file and issue a written determination within ten (10) working days.
2. **County Administrator:** If unresolved, the complainant may appeal to the Charlotte County Administrator. A meeting will be scheduled to review the grievance, during which the complainant may present their concerns. The County Administrator will issue a final local decision following the meeting.
3. **FloridaCommerce Appeal:** A citizen may submit a complaint directly to FloridaCommerce, Small Cities CDBG Program, 107 E. Madison Street, MSC 400, Tallahassee, FL 32399-6508. The State will review the issue and respond in writing.
4. **HUD Review:** Citizens may also file complaints with the U.S. Department of Housing and Urban Development (HUD), Jacksonville Field Office, 400 West Bay Street, Suite 1015, Jacksonville, FL 32202, or contact HUD's Office of Inspector General or Office of Fair Housing, depending on the nature of the complaint.

Appeals should be submitted within 30 days of receiving the County's formal response. The County encourages resolution at the local level whenever possible but supports the right of citizens to elevate complaints to state or federal oversight agencies without fear of retaliation.

Accessibility and ADA Compliance



Charlotte County is committed to ensuring that the complaint process is accessible to all individuals, including persons with disabilities. All meetings, communications, and materials related to CDBG citizen participation and complaints will be conducted in compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. The County will not discriminate against qualified individuals on the basis of disability in the provision of services, programs, or activities.

- **Accessible Facilities:** All public meetings and complaint-related activities will be held in accessible locations with necessary accommodations available, including FM sound enhancement units at the Murdock Administration Complex.
- **Auxiliary Aids and Services:** Upon request, Charlotte County will provide auxiliary aids and services such as qualified sign language interpreters, Braille materials, large print documents, or assistive listening devices at no charge.
- **ADA Coordinator Contact:** Requests for accommodations or complaints regarding accessibility should be directed to David Lyles, ADA Coordinator, at 941-743-1381 (voice), TDD/TTY 941-743-1234, or via email at David.Lyles@CharlotteCountyFL.gov.
- **Reasonable Modifications:** The County will make reasonable policy modifications as necessary to ensure equal access. No eligibility criteria, surcharges, or restrictions will be imposed on the basis of disability.

Charlotte County strives to ensure that all community members have full and fair access to participate in the CDBG complaint process.

Recordkeeping and Confidentiality

Charlotte County will maintain a complete record of all CDBG-related complaints, including the original complaint, correspondence, investigation notes, and resolution. Complaint records will be retained for a minimum of three (3) years after the grant closeout or the final resolution of the complaint, in compliance with 2 CFR §200.334 and applicable state retention rules.

All records will be kept in a secure location and made available for inspection upon request, subject to exemptions allowed under Florida's Public Records Law (Chapter 119, F.S.). The County will protect the identity of complainants to the extent permitted by law. Personal information will not be disclosed without the individual's consent unless required by law.

Charlotte County prohibits retaliation against any individual who submits a complaint or participates in the complaint process.

Oversight and External Authorities

Citizens may contact the following oversight bodies if they believe a complaint has not been resolved appropriately at the local level:

- **FloridaCommerce – CDBG Program**
107 E. Madison Street, MSC 400



Tallahassee, FL 32399-6508

Phone: (850) 717-8405

- **U.S. Department of Housing and Urban Development (HUD)**

Jacksonville Field Office

400 West Bay Street, Suite 1015

Jacksonville, FL 32202

Phone: (904) 232-2627

Complaints involving fraud, waste, or abuse may also be submitted to HUD's Office of Inspector General. Discrimination complaints may be filed with HUD's Office of Fair Housing and Equal Opportunity at 1-800-669-9777 or TTY 1-800-927-9275.

Equal Employment Opportunity and Fair Housing

Charlotte County is an Equal Opportunity Employer. The County does not discriminate in employment or the provision of services based on race, color, religion, sex, national origin, age, disability, marital status, familial status, sexual orientation, gender identity, or any other characteristic protected by law.

The County affirms its commitment to fair housing. No person shall be excluded from participation in, denied the benefits of, or subjected to discrimination under any CDBG-funded housing or community development program. Charlotte County complies with all applicable laws including Title VI of the Civil Rights Act, Section 109 of the Housing and Community Development Act, the Fair Housing Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act.

Fair housing complaints may be directed to the Charlotte County Fair Housing Coordinator at 941-833-6500 or filed with HUD's Office of Fair Housing and Equal Opportunity.



Chapter 3: 2 CFR Part 200 General Administrative Compliance

Purpose and Scope

These supplemental policies are intended to complement existing Charlotte County policies and procedures as the County undertakes activities related to the Community Development Block Grant (CDBG) program. This policy satisfies Attachment A, Section 3, Part B.5 of the CDBG-MIT and CDBG-DR Grant Agreements requiring written procedures under 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

I. Cash Management (§200.302(b)(6), §200.305)

Charlotte County will maintain written procedures for cash management to ensure that federal funds are drawn only as needed for immediate disbursement. Reimbursements will be based on actual, allowable expenditures that have been incurred and documented. The County will minimize the time between requesting funds and disbursing them to vendors or for project costs. All cash requests will include supporting documentation such as invoices or payroll records, and the County will maintain a reconciliation system to track receipt, disbursement, and balance of federal funds in compliance with §200.305.

II. Internal Controls (§200.303)

Charlotte County will establish and maintain effective internal control systems to provide reasonable assurance that CDBG awards are managed in compliance with federal statutes, regulations, and award terms. Internal controls will include segregation of duties, supervisory review of financial transactions, documented approval processes, and regular reconciliations. The County will use these controls to prevent fraud, waste, abuse, and mismanagement, and to ensure that expenditures are allowable, necessary, and supported.

III. Monitoring and Evaluation (§200.303)

Charlotte County will monitor all CDBG-funded activities on an ongoing basis to ensure compliance with program requirements. Monitoring will include periodic reviews of project expenditures, performance outcomes, and procurement processes. The County will document its monitoring activities, require corrective actions when deficiencies are found, and follow up to ensure corrections are implemented. This process ensures that federal funds are used as intended and in compliance with 2 CFR Part 200.

IV. Safeguarding Personally Identifiable Information (PII) (§200.303(e))

Charlotte County will protect all Personally Identifiable Information (PII) collected, created, or maintained under the CDBG program. The County will limit access to PII to authorized staff, store records securely in locked or password-protected systems, and prohibit unauthorized disclosure. When electronic records are used, the County will apply encryption, access controls, and audit trails. When disposing of records containing PII, the County will use secure methods such as shredding or certified digital deletion.



V. Cost Allowability (§200.302(b)(7), §200.403)

Charlotte County will establish and apply written procedures to ensure that costs charged to federal awards are allowable under 2 CFR Part 200. All costs must be necessary to carry out eligible activities, reasonable for the goods or services acquired, and allocable to the award in proportion to the benefit received.

Allowable costs must conform to any limitations or exclusions set forth in federal statutes, regulations, or the specific terms of the award. Costs must be consistent with procedures that are applied uniformly to both federally financed and other activities of the County, and they must be treated consistently across accounting periods.

The County will review and approve all costs prior to charging them to the award. Each transaction will be supported by adequate documentation, including invoices, receipts, contracts, or payroll records, demonstrating compliance with Subpart E of 2 CFR Part 200. Unallowable costs, such as alcoholic beverages, entertainment, fines, penalties, and other expressly prohibited expenses, will not be charged to CDBG awards under any circumstances.

Costs will be periodically reviewed by financial staff and program managers to ensure continued compliance with §200.403 and §200.302(b)(7). If a questioned cost is identified, corrective action will be taken immediately, and repayment will be made if necessary.

VI. Travel Policy (§200.475)

Charlotte County will reimburse travel costs associated with CDBG activities only when they are necessary, reasonable, and directly related to the program. Travel reimbursements will follow federal cost principles under §200.475, including allowable transportation, lodging, subsistence, and incidental expenses. The County will not reimburse expenses for alcoholic beverages, entertainment, or other unallowable costs. Reimbursement rates will not exceed the per diem and mileage rates established annually by the U.S. General Services Administration. All travel claims must be supported by receipts, itineraries, or mileage logs.

VII. Employee Benefits (§200.431)

Charlotte County will provide fringe benefits to employees working on CDBG activities in compliance with §200.431. Benefits must be reasonable, documented, and equitably applied to all employees in similar employment situations, regardless of whether their salaries are charged to federal awards. Allowable benefits may include health insurance, retirement contributions, leave accrual, and other standard employee benefits. Documentation of benefits will be maintained in personnel and payroll records.

VIII. Procurement Standards (§200.317–327)

Charlotte County will follow the federal procurement standards established in §§200.317–327. Procurement will be conducted in a manner providing full and open competition, avoiding unnecessary or duplicative purchases, and encouraging use of small and minority businesses, women's business enterprises, and labor surplus area firms when possible. All solicitations will include clear descriptions of the required goods or services and evaluation criteria. Contract



awards will be made only to responsible contractors with the ability to perform successfully. Required federal contract provisions will be included in all contracts funded by CDBG awards.

IX. Conflict of Interest (§200.318(c))

Charlotte County will enforce written standards of conduct to address organizational and personal conflicts of interest in procurement and program administration. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest exists. Disciplinary action will be taken against individuals who violate conflict of interest standards, consistent with §200.318(c).

X. Competitive Requirements (§200.319(d))

Charlotte County will ensure that all solicitations comply with the competitive procurement requirements in §200.319(d). Solicitations will clearly describe technical requirements, specify evaluation criteria, and provide sufficient response time. The County will prohibit noncompetitive practices and will document the rationale for any sole source procurement, which may only occur under the limited circumstances allowed by §200.320(c).

XI. Technical Evaluations (§200.320(b)(2))

Charlotte County will conduct technical evaluations of proposals received under competitive procurements. A written method will be used to evaluate proposals against published criteria, considering both cost and qualifications. Selection decisions will be documented and maintained in procurement records, in compliance with §200.320(b)(2).

XII. Equipment Management (§200.313(d))

Charlotte County will manage equipment purchased with CDBG funds in compliance with §200.313(d). The County will maintain accurate property records that include a description, serial or identification number, source, acquisition date and cost, location, use, condition, and disposition data. A physical inventory of equipment will be conducted at least once every two years and reconciled with property records. When equipment is no longer needed, disposition will follow federal guidelines, with proceeds handled as required by §200.313(d).

Recordkeeping (§200.334)

Charlotte County will retain all records related to CDBG activities for a minimum of three years after grant closeout, or longer if required by law or ongoing audit requirements. Records will be accessible to auditors, federal and state oversight agencies, and the public as required under Florida's Public Records Law.

Accessibility and Equal Opportunity

Charlotte County affirms compliance with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Section 109 of the Housing and Community Development Act, and the Fair Housing Act. Auxiliary aids and services will be provided upon request to ensure equal access to this policy and all CDBG-related activities.

provided upon request to ensure equal access to this policy and all CDBG-related activities.



Chapter 4: Financial Management

Purpose and Scope

These supplemental policies are intended to complement existing Charlotte County financial management and administrative practices as the County undertakes activities related to the Community Development Block Grant (CDBG) program. This policy satisfies the requirements of 2 CFR §§ 200.300–200.309, §§ 200.328–200.329, and 24 CFR Part 570, ensuring that Charlotte County’s financial management system provides proper stewardship, accountability, and transparency in the use of federal funds.

I. Accounting Systems, Records and Procedures

Disclosure of Financial Status

Charlotte County’s accounting system will provide accurate, current, and complete disclosure of the financial status of each CDBG project by eligible program activity. The system will produce financial statements and reports that reflect revenues, obligations, expenditures, and balances for each activity to ensure transparency and accountability.

Compilation of Required Data

The accounting system will compile and justify all financial data required in reports submitted to FloridaCommerce or HUD. Reports will be generated using system-based data that is reconciled with source documentation to ensure accuracy.

Identification of Funds

Records will identify the source and disposition of all CDBG funds for project activities. An audit trail will be established for every transaction, demonstrating when funds were received, where they were applied, and what they accomplished. This will allow the County to prove compliance at all times.

Source Documentation

All accounting records will be supported by original source documentation, such as purchase orders, contracts, invoices, payment requests, and payroll records. These records will clearly demonstrate the purpose, amount, and eligibility of each expenditure.

Verification of Costs

Accounting records will include documentation verifying that all costs charged to the CDBG program are reasonable, allowable, and allocable under 2 CFR Part 200 Subpart E. Staff must review supporting documentation before authorizing payment to confirm compliance with federal cost principles.

Comparison of Expenditures and Budgets

The financial management system will compare actual expenditures with budgeted amounts for each activity. Reports will be reviewed regularly by program and fiscal staff to identify variances, ensure funds are used as planned, and take corrective action if overspending or underspending occurs.



Minimization of Time Between Receipt and Expenditure

Charlotte County will minimize the amount of time between receipt of CDBG funds and their expenditure. Drawdowns will be limited to immediate needs, and disbursements will occur promptly upon receipt to ensure compliance with cash management requirements.

II. Internal Controls

Control and Accountability

Charlotte County maintains effective control over and accountability for all CDBG funds, property, and other assets. Funds and assets are used solely for authorized purposes and are protected from loss, misuse, or theft. Oversight includes reconciliation of accounts, periodic reviews of expenditures, and management approval of key transactions to safeguard against fraud and abuse.

Fiscal Organization and Management System

Charlotte County operates under a fiscal organization and management system that ensures proper and efficient administration of the grant. Procedures are formalized in writing and applied consistently across all CDBG activities. Procedures are designed to ensure internal control of funds and compliance with federal requirements. All financial transactions are documented in sufficient detail to establish a clear audit trail showing the source, purpose, and disposition of each transaction.

Written Internal Control Procedures

Charlotte County maintains written internal control procedures that provide staff with clear guidance for the responsible financial management of CDBG funds. These procedures address authorization of expenditures, segregation of duties, reconciliation, reporting, safeguarding of assets, and corrective actions for deficiencies.

Segregation of Duties

Charlotte County enforces internal controls that provide adequate segregation of duties. No individual has authority over all phases of a financial transaction, including authorization, processing, and reconciliation. Where staffing limitations prevent full segregation, supervisory personnel perform oversight to ensure accountability.

Assignment of Responsibilities

Charlotte County assigns authorities and responsibilities for financial functions to separate individuals. For example, the staff member authorizing contractor payments does not also issue the checks, and the staff member preparing checks does not reconcile bank accounts. This separation ensures multiple levels of review and accountability.

Independent Review of Bank Reconciliations

Monthly bank reconciliations and direct deposit statements are independently reviewed by personnel who are not responsible for handling cash or issuing checks. This independent review adds a layer of oversight to detect and prevent errors or irregularities.



Separation of Payroll Duties

The individual responsible for issuing checks for grant expenses does not prepare or issue payroll. Payroll duties are assigned separately to ensure that no individual both authorizes and processes payroll transactions.

Corrective Actions for Noncompliance

Charlotte County takes prompt corrective action when instances of noncompliance are identified internally or through audit findings. Corrective actions are documented in writing, tracked to completion, and reviewed by management to ensure deficiencies are resolved.

Safeguarding of Personally Identifiable Information

Charlotte County safeguards personally identifiable information (PII) and other sensitive information. Access to PII is restricted to authorized personnel. Physical files are stored securely, and electronic records are protected through passwords, encryption, and other cybersecurity measures in compliance with federal and state requirements.

Timely Expenditure of Funds

Charlotte County enforces procedures that ensure the timely expenditure of CDBG funds in accordance with the period of performance stated in the sub-recipient grant agreement. Ongoing monitoring of grant expenditures verifies that funds are disbursed and used promptly to achieve program goals.

III. Accounting Systems, Records and Procedures

Disclosure of Financial Status

Charlotte County's accounting system provides accurate, current, and complete disclosure of the financial status of each CDBG project by eligible program activity. Financial statements and reports reflect revenues, obligations, expenditures, and balances for each activity to ensure transparency and accountability.

Compilation of Required Data

The accounting system compiles and justifies all financial data required in reports submitted to FloridaCommerce or HUD. Reports are generated from system-based data that is reconciled with source documentation to ensure accuracy.

Identification of Funds

Accounting records identify the source and disposition of all CDBG funds for project activities. Every transaction is traceable through an established audit trail that demonstrates when funds were received, how they were applied, and what results were achieved.

Source Documentation

All accounting records are supported by original source documentation, including purchase orders, contracts, invoices, payment requests, and payroll records. These records demonstrate the purpose, amount, and eligibility of each expenditure.



Verification of Costs

All costs charged to the CDBG program are documented as reasonable, allowable, and allocable under 2 CFR Part 200 Subpart E. Supporting documentation is reviewed to confirm compliance with federal cost principles before payment is processed.

Comparison of Expenditures and Budgets

The financial management system compares actual expenditures with budgeted amounts for each activity. Program and fiscal staff review reports regularly to identify variances, ensure funds are used as planned, and take corrective action when necessary.

Minimization of Time Between Receipt and Expenditure

Procedures minimize the amount of time between receipt of CDBG funds and their disbursement. Drawdowns are limited to immediate needs, and disbursements occur promptly upon receipt to ensure compliance with federal cash management requirements.

IV. Budgetary Controls

Monitoring of Obligations and Expenditures

Charlotte County monitors obligations and expenditures against approved budgets for all CDBG-funded activities. Financial staff review activity-level budgets on a regular basis to ensure that spending aligns with approved line items and program objectives.

Distinct Accounting Information

The accounting system contains distinct accounting information for each eligible activity and for each federal grant. Revenues, obligations, and expenditures are tracked separately so that records cannot be co-mingled across activities or awards.

Recording of Encumbrances

Accurate records of encumbrances and obligations are maintained when vendor contracts or purchase orders are issued. This process ensures that committed funds are reflected in budget reports prior to payment.

Grant Accounting Records

The accounting system maintains accurate records of grant awards, unobligated balances, assets, liabilities, expenditures, program income, and any applicable interest. These records allow staff and auditors to verify financial position at all times.

Source Documentation for Requests

All reimbursement requests are supported by vendor or contractor contracts, invoices, and purchase orders. Requests that lack full source documentation are not processed for payment.

Compliance Reporting

The financial management system is sufficient to prepare all reports required to demonstrate compliance with federal statutes, regulations, and the terms and conditions of the federal award. Reports provide both financial and programmatic data necessary for oversight.



Real-Time Tracking of Costs

The accounting system provides clear, real-time tracking of costs. Financial reports can be generated at any time to show cumulative expenditures by activity, budget category, and funding source.

Transaction Registry

A transaction registry documents all invoices associated with each request for payment. The registry identifies the source of funds for each invoice, including CDBG grant funds, matching funds, or other leveraged funds.

Required Source Documentation

The following source documentation is required and retained for all transactions:

- Original source documents such as contracts, purchase orders, and invoices.
- Requests for payment and addendum records of direct deposit payments.
- Verification of deposits and monthly bank statements with cancelled checks.
- Check registers or transaction ledgers.
- Employee time sheets and equipment time record sheets.
- Property and equipment inventory logs.
- Contractor requests for payment.
- Electronic funds transfer (EFT) forms.

This documentation provides a complete and verifiable trail for every transaction charged to CDBG funds.

V. Accounting Documentation

Separate Accounting Records

Charlotte County maintains separate accounting records for each CDBG project. Revenues and expenditures for each project are readily identifiable, and records comply with 2 CFR § 85.20(b)(2) requirements to document the source and application of funds, including authorizations, obligations, unobligated balances, assets, expenditures, income, and interest.

Cash Receipt Journal

A cash receipt journal records all receipts of CDBG funds. Each entry includes the date of receipt, the amount received, the source of funds, and the accounts into which funds are deposited.

Cash Disbursement Journal

A cash disbursement journal records all disbursements made for CDBG projects. Each entry includes the date of payment, the payee, the check number, the amount, and the account from which payment was made.



General Ledger

A general ledger summarizes the monthly receipts and disbursements for each CDBG activity. The ledger provides an overview of financial status and is reconciled with supporting journals.

Journal Vouchers

Journal vouchers document adjustments to general ledger accounts. Each voucher includes an explanation of the adjustment and the associated amounts.

Fixed Asset and Equipment Ledger

A fixed asset and equipment ledger lists all fixed assets and equipment purchased with CDBG funds. The ledger includes description, identification number, acquisition date, cost, condition, and location of the asset.

Project Cash Register

A project-specific cash register records all requests for payment, checks received, and balances of CDBG grant funds for each project.

Detailed Activity Ledger

A detailed activity ledger is established for each CDBG project. All financial transactions related to a project are recorded in the ledger to maintain full accounting control.

Definition of Source Documentation

Charlotte County defines source documentation to include purchase orders, contract agreements, invoices, payment requests, and time distribution sheets. These records provide the basis for verifying expenditures charged to CDBG funds.

Requirement for Original Source Documents

Source documentation is retained in its original form. Photocopies are not accepted as primary support. Each source document must provide all details of the transaction and demonstrate that funds were used in accordance with the approved scope of work.

Responsibility to Document Use of Funds

Charlotte County accepts full responsibility to document how every CDBG dollar is used. Source documents provide the evidence necessary to show that funds are used solely for eligible activities and consistent with the approved project scope.



Chapter 5: Financial Activity

Purpose and Scope

Charlotte County will submit reimbursement requests that fully comply with State requirements and the Subrecipient Agreement. This policy sets the exact materials and certifications Charlotte County will include in each reimbursement package and the order in which they will be presented. The intent is to ensure timely approvals, complete documentation, and transparent financial management.

Submission Header and Routing Information

Charlotte County will include a submission header that identifies the Subrecipient name, the Grant Agreement Number, and the FA Number. The header will also present the Invoice Approved indicator, the Amount of Reimbursement Approved, and the Period of Financial Activity being claimed. The cover page will list the Grant Manager's name and the Date Review Completed. These items will appear on the first page of the reimbursement package or in the State-required cover sheet.

I. Desk Review Requirements

Environmental Exemption Approval Letter

Charlotte County will include the date of the Environmental Exemption Approval Letter in each reimbursement request, when applicable. This will confirm that the environmental compliance step is complete for the associated activity. The documentation will be filed in the reimbursement package and cross-referenced to the applicable task or deliverable.

Authority to Use Grant Funds (AUGF)

Charlotte County will include the date of the Authority to Use Grant Funds letter in each reimbursement request, when applicable. No reimbursement request will be submitted until the AUGF is issued for the relevant activity. The AUGF date will be shown clearly on the cover sheet and in the supporting documentation index.

Affirmative Action Program Plan

Charlotte County will include the date of the approved Affirmative Action Program Plan. The package will indicate the effective date and where the approval resides in the file. If the plan has a renewal cycle, the submission will reference the current approved version.

Completion Gate for Items 1–3

Charlotte County will only submit reimbursement requests after confirming that the Environmental Exemption Approval Letter, AUGF (if applicable), and the Affirmative Action Program Plan are complete. If any prerequisite is missing, Charlotte County will defer submission until it is obtained. This gate will be noted in the package checklist.

II. General Financial Activity Approval



Current Monthly and Quarterly Reports

Charlotte County will be current on all monthly and quarterly reports at the time of submission. If any required reporting is outstanding, Charlotte County will bring it current before submitting a reimbursement request. The package will include a statement of reporting status.

Minimum Level of Services or Percentage of Completion

Charlotte County will submit reimbursement requests only after reaching the minimum level of services or percentage of completion required for the activity. Charlotte County will confirm that an AUGF, when required, has been issued prior to requesting any reimbursement. The package will reference the progress basis used, such as the engineering deliverable percentage of completion.

Prohibition on Submissions Lacking Required Items 6–11

Charlotte County will ensure items 6 through 11 below are fully included before submitting a reimbursement request. If any item is incomplete, Charlotte County will hold the package until corrected. This standard aligns with the Subrecipient Agreement requirements for invoice submittal.

Invoice Deliverables and Tasks

Charlotte County will include an invoice that clearly states the deliverables and tasks for which reimbursement is requested. The description will reference the exact task numbers and titles in the Grant Agreement. Each line item will connect to the supporting documents.

Alignment and Allowability

Charlotte County will confirm that each deliverable and task in the invoice aligns with the Grant Agreement and is allowable. If alignment is unclear, Charlotte County will correct the description or adjust the request before submission. The package will include a brief concordance table mapping invoice lines to agreement deliverables.

Dates, Period, Amount, and Work Completed to Date

Charlotte County will include the dates of the invoice, the period during which the work was performed, the amount requested, and the cumulative work completed to date. These elements will be visible on the invoice and reiterated on the cover sheet. Any phase-to-date totals will reconcile to prior approved reimbursements.

Cover Letter Certifications by the Grant Manager

Charlotte County will include a cover letter signed by the Subrecipient's Grant Manager certifying that costs are specifically for the project represented to the State in the budget appropriation; that costs are for one or more of the components stated in the Deliverables section of the agreement; that the costs have been paid; and that the costs were incurred during the term of the agreement. The letter will list the amount requested and the period covered. The letter will reference the attached documentation index.

Certification of Work Completed for Construction

For construction reimbursements, Charlotte County will include certification by a licensed



professional using AIA G702 and G703 or a substantive equivalent certifying that the project, or a quantifiable portion, is complete. For grant administration and engineering, Charlotte County will include a Certification of Work Completed signed by the City or County Manager or Department Head. The certification will match the quantities and values shown on the invoice.

Photographs for Construction

For construction reimbursements, Charlotte County will include photographs of the project in progress and of completed work for the period claimed. Photos will be labeled with dates, locations, and a brief description tying them to the invoiced activities. Image references will align to invoice line items where appropriate.

Supporting Documentation for Vendor Payment

Charlotte County will include copies of all supporting documentation for vendor payments. This will include executed contracts, purchase orders, invoices, receiving reports, and any required approvals. Each document will be labeled to show the related invoice line.

Bank Evidence of Payment

Charlotte County will include copies of bank statements that show cancelled checks or evidence of electronic funds transfer corresponding to the payments being claimed. If requested by the State, Charlotte County will provide additional banking or payment detail to verify that services were rendered and paid. Bank documentation will be redacted only to the minimum extent necessary to protect account security.

Local Leverage Documentation and Deduction

Where applicable, Charlotte County will document any local leverage associated with the period being claimed and deduct it from the reimbursement amount. The calculation will be shown on the invoice or a leverage worksheet. The package will demonstrate that non-federal funds are applied before requesting federal reimbursement where required.

III. Grant Manager's Approval Package (Post-Approval)

SERA Grant Management Payment Cover Sheet

Charlotte County will download and include the SERA Grant Management Payment Cover Sheet as part of the approval package. The cover sheet will be filed as the first or second page after the invoice. Any State-specified placement order will be followed.

SERA Reimbursement Printout

Charlotte County will download and include the SERA Reimbursement Printout for the period being claimed. The printout will be verified for agreement with the invoice totals. Any discrepancies will be corrected before submission.

FACTS Summary of Contractual Services Agreement

Charlotte County will download and include the FACTS Summary of Contractual Services Agreement. The summary will correspond to the active agreement under which the



reimbursement is requested. Any updates to the FACTS record will be reflected prior to submission.

Populating Required Fields on SERA and FACTS Forms

Charlotte County will populate dates, signatures, approval dates, funds approved, agency contact name, contact phone number, invoice number, invoice period, and the amount of previous payments on the SERA and FACTS forms as required. Missing fields will be completed before the package is routed for submission. Review initials and dates will be applied by the Grant Manager.

Uploading to SERA Files

Charlotte County will upload the complete Grant Manager Approval Package to the Files section of SERA. The upload will include the cover sheet, reimbursement printout, FACTS summary, invoice, certifications, photos, payment documentation, bank evidence, leverage documentation, and any other required materials. The upload will be confirmed and the confirmation retained.

IV. Conclusions and Notes

Findings and Concerns

Charlotte County will include a short narrative when any finding, concern, or unusual condition is relevant to the reimbursement period. The narrative will state what was identified, when it occurred, and its effect on the claimed costs. If no findings or concerns exist, the narrative will indicate none.

Corrective Actions

When applicable, Charlotte County will describe corrective actions to resolve issues affecting the reimbursement. The description will include responsible staff, target dates, and how completion will be verified. Evidence of completion will be appended to the next reimbursement or supplied upon request.

Technical Assistance Provided or Requested

When technical assistance was provided to contractors or internal teams, Charlotte County will briefly describe the assistance and the outcome. If technical assistance from the State is requested, Charlotte County will specify the topic and the documents attached for review. The goal is to resolve issues before they affect future reimbursements.

File Naming Convention

Charlotte County will save the reimbursement package using the convention: Subrecipient's Name_Amount_Invoice Number_FA Number_Agreement Number. The same convention will be used for any resubmission, with an added revision identifier. Filenames will be reflected in the SERA upload.



Chapter 6: Procurement Policy

Purpose and Scope

This policy governs all procurements funded in whole or in part with CDBG or other federal funds administered by Charlotte County. The policy complies with 2 CFR §§ 200.317–200.327, Chapter 73C-23.0051(1), Florida Administrative Code, section 255.0525, Florida Statutes (Advertising for Bids or Proposals), and section 287.055, Florida Statutes (Consultants' Competitive Negotiation Act).

I. General Procurement Standards (2 CFR § 200.318)

Charlotte County uses documented procurement procedures consistent with state and local law and federal requirements. All acquisitions of property and services are governed by these procedures to ensure accountability and compliance with federal standards.

Charlotte County maintains written standards of conduct that address real and apparent conflicts of interest. These standards govern the actions of employees, officers, and agents involved in procurement, and violations result in disciplinary action to preserve the integrity of the process.

Procurement procedures include steps for resolving protests from vendors or bidders. The process specifies how protests are filed, timelines for review, and the authority responsible for final determinations, ensuring transparency and fairness.

Procurement procedures prevent unnecessary or duplicative purchases by requiring justification of need and documentation of analysis. Where applicable, staff evaluate options such as lease versus purchase or consolidating needs across projects to identify the most economical approach.

Charlotte County promotes the use of intergovernmental and inter-entity agreements to increase efficiency and reduce costs. These arrangements are documented in the procurement record and used only when they preserve competition and comply with applicable laws.

When feasible, the County encourages the use of federal excess and surplus property instead of purchasing new items. This practice reduces costs and extends the life of government-owned resources while meeting program needs.

Value engineering clauses are incorporated into construction contracts of sufficient size to encourage cost savings. These provisions allow for contractor suggestions that reduce costs without reducing quality or delaying completion.

Contracts are awarded only to responsible contractors who demonstrate the integrity, performance history, and financial and technical resources to perform successfully. Prior to award, staff review past performance, verify compliance with public policy, and check suspension and debarment lists to ensure eligibility.



Charlotte County maintains full documentation of procurement history for each transaction. Records include the method of procurement, rationale for decisions, selection process, contract type, basis for price, and any administrative approvals, ensuring that every procurement can be audited.

Time-and-materials contracts are permitted only when no other type of contract is suitable. These contracts must include a ceiling price that the contractor cannot exceed, and staff actively monitor performance to ensure cost-effectiveness.

Charlotte County is responsible for resolving all contractual and administrative issues related to procurements. This includes source evaluation, protests, disputes, and claims, which are documented in writing and retained in the procurement record.

II. Competition (2 CFR § 200.319)

All procurement transactions are conducted with full and open competition. Solicitations are structured to ensure that no vendor receives an unfair advantage, and restrictive practices are prohibited.

Contractors or consultants who develop specifications, statements of work, or solicitation documents are prohibited from competing for the same procurement. This eliminates conflicts of interest and ensures fairness.

All solicitations include clear and accurate descriptions of the goods or services to be procured. Specifications define essential characteristics and quantities but do not contain unnecessary features that would unduly restrict competition.

Any prequalified lists of vendors used by Charlotte County are regularly updated and include sufficient qualified sources to ensure broad competition. Vendors may qualify during solicitation periods, allowing new firms opportunities to participate.

III. Methods of Procurement (2 CFR § 200.320)

Charlotte County uses the five federally recognized procurement methods: micro-purchases, small purchases, sealed bids, competitive proposals, and noncompetitive procurement when permitted. Each method is documented in the procurement file.

Micro-purchases of less than \$10,000 are distributed equitably among qualified suppliers. Staff determine that prices are reasonable and retain supporting documentation to demonstrate cost reasonableness.

Small purchases exceeding \$10,000 but below the Simplified Acquisition Threshold require quotes from an adequate number of qualified sources. Price quotations are documented and retained to show competition.



Sealed bidding is used when specifications are clear and a firm fixed price contract is appropriate. Invitations for bids are publicly advertised, bids are opened at the specified time and place, and contracts are awarded to the lowest responsive, responsible bidder.

Competitive proposals are used when sealed bids are not suitable. Requests for proposals describe evaluation factors and their relative importance, and awards are made to the offeror whose proposal is most advantageous, considering price and technical factors.

For architectural and engineering services, Charlotte County follows a qualifications-based selection process. The most qualified firm is selected based on demonstrated competence, and fair and reasonable compensation is negotiated. Price is not a selection factor for A/E qualifications-based procurements.

Noncompetitive procurement is only used under limited circumstances allowed by 2 CFR § 200.320(c), such as sole-source availability or public emergencies. Awards above \$25,000 require Commerce approval, and full justification is documented in the file.

IV. Affirmative Steps for Small, Minority, and Women's Businesses (2 CFR § 200.321)

Charlotte County takes affirmative steps to ensure the participation of small, minority, and women's businesses, as well as labor surplus area firms. These steps are documented in each procurement file when applicable.

Actions include placing such firms on solicitation lists, assuring they are solicited when potential sources exist, dividing requirements into smaller tasks when feasible, and establishing delivery schedules that encourage participation. Staff also use SBA and MBDA resources when appropriate and require prime contractors to apply the same steps when subcontracting.

V. Domestic Preferences and Recovered Materials

Charlotte County provides preference for goods, products, and materials produced in the United States to the maximum extent practicable. Solicitations and contracts include domestic preference language as required.

Charlotte County complies with section 6002 of the Solid Waste Disposal Act, as amended, and 2 CFR § 200.323 by procuring items with recovered material content where designated. Solicitations reference recovered materials standards when relevant.

VI. Cost and Price Requirements (2 CFR § 200.324)

Charlotte County performs a cost or price analysis for every procurement above the Simplified Acquisition Threshold, including modifications and cases where only one proposal is received. The level of analysis is appropriate to the purchase and documented in the file.



Procurement records show that all costs are allowable under 2 CFR § 200.403 and reasonable under § 200.404. Analyses consider market conditions, competition, and contractor proposals to establish fair pricing.

Cost-plus-percentage-of-cost and percentage-of-construction-cost methods are expressly prohibited.

VII. Federal and Pass-Through Review (2 CFR § 200.325)

Charlotte County provides HUD or Commerce with technical specifications and procurement documents upon request. Reviews may occur after solicitation development to ensure compliance with applicable requirements.

VIII. Bonding Requirements (2 CFR § 200.326)

For construction or facility improvement contracts exceeding the Simplified Acquisition Threshold, Charlotte County requires performance and payment bonds to adequately protect the federal interest. Bonding requirements are included in solicitations and contract files.

IX. Required Contract Provisions (2 CFR § 200.327 and Appendix II)

All federally funded contracts include provisions required by statute, executive order, or regulation. These include Equal Employment Opportunity, Davis-Bacon Act when applicable, Debarment and Suspension, Termination for Cause and Convenience, and Section 3 of the Housing and Urban Development Act.

X. Additional Provisions

Procurement documents comply with Section 508 accessibility standards for electronic and information technology.

Personally identifiable information, proprietary materials, and financial statements submitted by bidders are kept confidential and secure.

Charlotte County designates a single point of contact during solicitations to prevent conflicts of interest, often referred to as a “Cone of Silence.”

Charlotte County does not piggyback on other entities’ contracts for CDBG-funded procurements. Each procurement follows full and open competition requirements.

Procurement procedures include language describing award notification and negotiation processes. Awards are documented, and negotiations are recorded in the procurement file.

XI. State Statutory Compliance



Charlotte County complies with section 255.0525, Florida Statutes, for advertising competitive bids and proposals.

Charlotte County complies with section 287.055, Florida Statutes, for selecting engineering, architectural, and surveying services in accordance with the Consultants' Competitive Negotiation Act.



Chapter 7: Fair Housing Policy

Purpose

Charlotte County is committed to ensuring that all residents have equal access to housing opportunities. This policy affirms compliance with the federal Fair Housing Act, state and local fair housing laws, and the County's responsibility as a local government. It also outlines the County's obligation to affirmatively further fair housing (AFFH) in all federally assisted housing and community development activities.

Ordinance Adoption

Charlotte County adopted a Fair Housing Ordinance on February 6, 1996, prohibiting discrimination in housing on the basis of race, color, religion, sex, national origin, familial status, and disability. The ordinance remains in effect today and serves as the local legal authority for enforcing fair housing protections.

Scope

This policy applies to:

- All programs and activities administered or funded by Charlotte County, including CDBG, HOME, SHIP, and other housing and community development programs.
- Partnerships and contracts with private housing providers, developers, lenders, and contractors doing business with the County.
- Public information, communications, outreach, and services related to housing or housing choice.

Policy Statement

It is the policy of Charlotte County to provide, promote, and protect fair housing rights for all individuals. Discrimination in housing on the basis of race, color, national origin, religion, sex (including sexual orientation and gender identity), familial status, age, or disability is prohibited. Charlotte County will administer all housing-related programs in a manner that affirmatively furthers fair housing in accordance with 42 U.S.C. § 3608(e)(5), Executive Order 12259, and 24 CFR 570.601.

Implementation

Public Information & Education

Charlotte County will display the Equal Housing Opportunity logo and statement in all County housing offices, websites, and printed materials. The County will host outreach and education events, provide fair housing brochures at public locations, and conduct campaigns to inform residents, landlords, lenders, and developers of their rights and responsibilities under fair housing laws.

Review of Policies & Practices

The County will periodically review housing-related ordinances, zoning policies, and permitting



practices to identify and correct barriers to fair housing choice. Any identified policies with discriminatory effects will be revised.

Analysis of Impediments (AI)

Charlotte County will prepare and maintain a HUD-required Analysis of Impediments to Fair Housing Choice (AI). The AI will:

- Identify potential impediments to housing choice such as restrictive zoning, discriminatory lending or real estate practices, concentrations of minority or low-income households, or unequal public service delivery.
- Rely on data from HUD, Census, lending patterns, and local input.
- Guide corrective actions that Charlotte County will take to eliminate or reduce impediments.

The AI will be updated regularly, and the County may coordinate with the State's AI process when appropriate.

Addressing Potential Impediments

When impediments are identified, Charlotte County will develop strategies to address them. This includes working with housing developers to expand affordable housing, collaborating with financial institutions to address lending barriers, updating zoning policies, and targeting outreach to underrepresented populations.

Accessible and Inclusive Housing

Charlotte County ensures that people with disabilities have equal access to programs and services. The County will provide reasonable accommodations and modifications and will work to expand affordable and accessible housing options across neighborhoods.

Contractor & Partner Compliance

All developers, contractors, and agencies receiving County financial assistance or approvals must comply with fair housing laws and certify adherence to this policy. The County reserves the right to deny, suspend, or terminate contracts with entities that engage in discriminatory practices.

Complaint and Enforcement Process

Charlotte County will inform residents about their right to file housing discrimination complaints with HUD's Office of Fair Housing and Equal Opportunity (FHEO) or the Florida Commission on Human Relations (FCHR). Complaints received directly by the County will be logged, referred to the appropriate enforcement agency, and tracked until resolved. The County will provide written acknowledgment to complainants and ensure follow-up actions are taken. Complaints will be reviewed within **15 working days** of receipt, and findings will be documented.

Recordkeeping

The Fair Housing Coordinator will maintain detailed records of all fair housing activities, including complaints, outreach events, monitoring reviews, and data analysis. Records will be



used to evaluate discriminatory practices, measure the effectiveness of outreach, and guide strategies for eliminating impediments.

Training

County staff involved in housing, planning, zoning, permitting, or community development activities will receive regular training on fair housing. Training will cover the Fair Housing Act, Section 504, the Americans with Disabilities Act (ADA), AFFH requirements, complaint handling, and staff responsibilities. Training records will be maintained by the Fair Housing Coordinator.

Fair Housing Coordinator

Charlotte County has designated a Fair Housing Coordinator to oversee implementation of this policy. The Coordinator is available during normal business hours to receive complaints, provide guidance, track records, and ensure compliance.

Coordinator Contact:

Rich Gromalski, Fair Housing Coordinator

Charlotte County Human Services Department

Phone: (941) 833-6520

Email: Rich.Gromalski@charlottecountyfl.gov

Commitment to Fair Housing

Charlotte County affirms its commitment to ensure every resident has the right to fair, safe, and affordable housing. The County will continuously monitor, educate, and enforce fair housing rights, affirmatively further fair housing, and take proactive steps to remove impediments to housing choice for all resident



Chapter 8: Anti-Fraud, Waste, and Abuse Policy

Introduction

Charlotte County has zero tolerance for the commission or concealment of acts of fraud, waste, and abuse in the administration of federal funds. Any and all allegations of such acts will be investigated, and if substantiated, disciplinary and corrective action will be taken up to and including termination of employment, termination of contracts, and referral to law enforcement when appropriate. Charlotte County is responsible for ensuring the effectiveness and efficiency of operations including the protection of CDBG-DR assets from fraud, waste, and abuse. County Administration has the primary responsibility for the implementation of internal controls to deter and detect fraud.

Scope

This policy applies to all Charlotte County employees, contractors, consultants, subrecipients, and volunteers engaged in the implementation of CDBG-DR programs. The provisions of this Policy apply to any instance of fraud, waste, or abuse involving not only employees but also external organizations doing business with Charlotte County and volunteers at County-sponsored events. Any employee overseeing contractors or volunteers is responsible for ensuring compliance with this policy.

Commitment to Confidentiality and Anonymity

When reporting fraud, waste, and abuse, Charlotte County will make all reasonable efforts to respect the confidentiality of the employee or individual making the disclosure as long as maintaining confidentiality does not interfere with conducting an investigation of the allegations, taking corrective action, or meeting legal requirements. All information received, all investigative materials developed, and all interviews conducted during the course of an investigation will be treated confidentially. Exceptions apply if:

1. The reporting individual self-discloses his or her identity;
2. Identification is necessary for County or law enforcement officials to investigate or respond;
3. Identification is required by law; or
4. Findings must be reported to state or federal oversight agencies.

Whistle-Blower Protection

Retaliation against an employee who in good faith filed a report of alleged fraud, waste, or abuse, or who participated in an investigation, is prohibited under Section 112.3187, Florida Statutes, and Charlotte County's Whistle-Blower Policy. Any retaliatory actions will result in disciplinary measures.

Definitions of Fraud, Waste, and Abuse

Fraud – Fraud involves intentional deception to secure unlawful or unfair gain. This includes intentional misstatement of financial information, theft, embezzlement, concealment of material facts, or conversion of assets for personal use. Fraud can result in criminal charges including theft, embezzlement, and larceny.



Waste – Waste means the careless, reckless, or needless expenditure, mismanagement, or squandering of resources to the detriment of Charlotte County. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls.

Abuse – Abuse means the excessive or improper use of resources, authority, or systems. Abuse includes intentional destruction, diversion, manipulation, misapplication, or misuse of resources as well as extravagant or excessive practices that violate County standards or legal requirements. Neither waste nor abuse necessarily leads to fraud, but both can create conditions where fraud occurs.

Examples of Fraud, Waste, and Abuse

Examples include, but are not limited to:

- Forgery or alteration of documents such as checks, contracts, purchase orders, invoices, or time sheets.
- Misrepresentation of information on records such as employment applications, travel reimbursements, or financial reports.
- Theft, unauthorized removal, or destruction of County records, property, or equipment.
- Misappropriation of funds, supplies, or assets.
- Improprieties in handling or reporting financial transactions.
- Abuse of County time, including falsification of hours worked or unauthorized time away.
- Authorizing or receiving payment for goods not received or services not performed.
- Vendor kickbacks or bribes.
- Misuse of authority for personal gain.
- Fraudulent alteration or destruction of electronic data.
- Inappropriate use of County-provided electronic devices or systems.

Responsibilities

Employees – All employees who have knowledge of fraud, waste, or abuse, or who have reason to suspect such conduct, must report the information immediately. Reports may be made anonymously. Employees who knowingly fail to report suspected activity will be subject to disciplinary action.

Citizens and Vendors – Charlotte County strongly encourages citizens, customers, and vendors to report suspected fraud, waste, or abuse.

Management – The County Manager or designee is responsible for investigating allegations or delegating investigations to senior staff or law enforcement. All County employees must fully cooperate with investigations.

Filing a Report

Reports of suspected fraud, waste, or abuse may be made by:

- Emailing cdbg@charlottecountyfl.gov (anonymous reporting permitted).



- Calling the County Administrator's Office at (941) 743-1944.
- Calling the CDBG Office at (941) 833-6506.
- Submitting a report in writing or in person through a supervisor, department head, HR, or County Administration.

Complaint Process

Complaints may be filed anonymously or non-anonymously. All complaints are logged, reviewed, and responded to in writing within **15 working days** of receipt. Reports are routed to the appropriate investigative authority, findings are documented, and corrective action is tracked.

Oversight and Monitoring

Charlotte County conducts regular internal monitoring and oversight of all CDBG-DR programs. Monitoring activities actively review duplication of benefits, anomalies, suspected fraud tied to performance problems, and misuse of funds. Monitoring plans explain how and why monitoring is conducted, the frequency of reviews, and the specific items monitored.

Risk Review

Charlotte County evaluates the risk level of all grant activities. Activities with higher dollar values, greater complexity, or past compliance issues are subject to more frequent and detailed monitoring. Risk assessments are documented and used to guide oversight priorities.

Programmatic and Financial Oversight

Charlotte County ensures both programmatic and financial oversight of CDBG-DR activities. Program staff conduct compliance and performance monitoring, while fiscal staff review financial documentation, invoices, and reporting. Oversight is coordinated across departments to ensure full accountability for expenditures and outcomes.



Chapter 9: Quality Assurance/ Quality Control Policy

Purpose

The Quality Assurance/Quality Control (QA/QC) Plan is an independent and objective guide intended to add value and improve the operations of Charlotte County while reducing risks of DEO, HUD, and program non-conformance. The QA/QC Plan ensures compliance with all local, state, and federal rules and regulations. This policy outlines a formal process to identify potential compliance issues, implement corrective actions, and promote best practices for County-wide CDBG program management.

Procedures

1. Charlotte County documents and exercises impartial, unbiased, and professional care when completing QA/QC reviews.
2. Charlotte County exhibits the highest level of professional objectivity in gathering, evaluating, and communicating information, findings, and conclusions about processes and data at all times.
3. Charlotte County ensures a balanced assessment of each file review, free from undue influence by personal interests or external pressures.
4. QA/QC reviews are designed to reduce the risks of HUD and DEO program non-conformance. All applicable federal regulations, including 24 CFR 202 (4700.2), are upheld.
5. When a potential compliance issue is identified, Charlotte County remedies the issue promptly. All documents are reviewed by multiple staff and, if necessary, referred to the County Attorney. Complaints regarding program compliance are reviewed within five business days, with a formal report created and corrective actions implemented.
6. All legal obligations and requirements of CDBG grant agreements are upheld. Grant agreement compliance is a County-wide priority.
7. Charlotte County uses file reviews and data analysis to identify deficiencies, improve efficiency, and strengthen program processes. Project managers conduct reviews periodically and at project conclusion.
8. Charlotte County continuously monitors all CDBG projects within the terms of each grant agreement and program guidelines established by DEO and HUD.
9. Charlotte County confirms that all program expenditures and requests for reimbursement are eligible under the Grant Agreement, Scope of Work, state and federal law, DEO guidelines, and HUD regulations.
10. Charlotte County maintains a process for reporting findings, exceptions, and concerns internally and to DEO when applicable. Reporting is timely and designed to reduce monitoring concerns, findings, or repayments.
11. Charlotte County follows up on identified compliance issues by investigating within five business days and implementing corrective actions promptly. Follow-ups continue until resolution is verified.
12. Charlotte County implements continuous process improvement. Corrective actions are used to prevent recurrence, and improvements are implemented whenever opportunities are identified.



Findings, Reporting, and Issue Resolution

Charlotte County classifies findings based on potential impact:

- Observations/Concerns: Findings that do not impact program outcomes.
- Findings/Material Exceptions: Findings likely to result in DEO/HUD sanctions, monitoring findings, or repayment of federal funds.

QA/QC Roles and Responsibilities

- **Luke Wright, CDBG Program Coordinator**
Role: First Level Reviewer and Initiator
Responsibilities: Reviewing all grant-related documents for compliance; initiating complaint investigations; documenting corrective actions, observations, and concerns; recommending process improvements; documenting and recommending corrective actions for findings or exceptions.
- **Colleen Turner, Senior Human Services Manager**
Role: Second Level Reviewer
Responsibilities: Reviewing all grant-related documents for compliance; reviewing complaint investigations; reviewing and implementing corrective actions; recommending and implementing process improvements; documenting and resolving concerns; developing Corrective Action Plans as needed.

The QA/QC team maintains complete and accurate records of all observations, concerns, findings, and exceptions, as well as all internal and monitoring reviews. Records serve as the basis for reporting to program managers and for prescribing corrective measures.

All findings are evaluated within five business days. The QA/QC team meets to discuss corrective actions and convenes weekly until issues are resolved. If necessary, the County Attorney or Finance Department is engaged.

Systemic findings require the development and implementation of a Corrective Action Plan (CAP).

Quarterly QA/QC Report

Charlotte County develops a quarterly QA/QC report identifying:

- The number of observations, concerns, findings, and exceptions.
- The number of follow-up reviews.
- A summary of exceptions and corrective actions taken.
- Additional controls implemented to mitigate risks.
- Comparative analysis of quarterly findings and performance against previous quarters to support program and executive-level decision-making.



CDBG Supplemental Policies