CHIPOLA COLLEGE

Marianna, Florida

GRANTS HANDBOOK

AND GUIDELINES

Office of Assessment, Compliance, and Grants

Revised: October 2026

INTRODUCTION

Chipola College is committed to pursuing external funding for projects and activities that support its mission and serve the educational and workforce development needs of the Northwest Florida region. This Grants Handbook and Guidelines document provides direction to all College employees involved in identifying, applying for, implementing, and closing out grant-funded projects.

This handbook establishes standard procedures and expectations for grant management across the College. It serves as the primary reference for the Office of Assessment, Compliance, and Grants (ACG), project directors, grants coordinator, and all personnel involved in grant-funded activities. Adherence to these procedures ensures compliance with applicable federal and state laws, Florida Administrative Code, and Chipola College Board policies.

Legal Authority. Chipola College operates as a Florida College System institution governed by Chapter 1001, Florida Statutes, and the rules of the Florida State Board of Education (Florida Administrative Code (FAC) Title 6A). Federal grants are administered pursuant to 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), commonly referred to as the Uniform Grant Guidance (UGG), as well as the Education Department General Administrative Regulations (EDGAR), 34 CFR. State-funded programs are governed by the Florida Department of Education Green Book of Regulations and the Accounting Manual for Florida's College System.

⚑ **REMINDER:** All grant activities must comply with applicable federal statutes, Florida Statutes, Florida Administrative Code, and Chipola College Board policies. When regulations conflict, the more restrictive provisions apply.

GRANT MANAGEMENT PERSONNEL

Grant development and submission depend on campus-wide collaboration. The following individuals have defined responsibilities for initiating, developing, submitting, and managing grants on behalf of Chipola College.

Administrative Grant Team (AGT)

The Administrative Grant Team provides governance and oversight for all grant activities at the College. Membership includes the Associate Vice President of the Office of Assessment, Compliance, and Grants; the Vice President of Instructional Affairs; the Vice President of Administrative and Business Affairs; the Associate Vice President of Human Resources; and the Associate Vice President of Student Affairs.

Responsibilities of the Administrative Grant Team include:

- Determining which grants the College will pursue and approving all proposed grant pursuits prior to proposal or application development
- Providing leadership and overall guidance for grant activities at the College
- Meeting monthly, or as frequently as the team deems necessary, to discuss the progress of funded grant projects and make decisions on future operations
- Ensuring that College resources and procedures are in place to facilitate the timely implementation of grant-funded activities in accordance with grantor-approved activities and budgets
- Providing guidance on grant implementation, operation, and closure

Authority: Chipola College Board Policy; CAP 1.4, Grant Proposals (Revised 1-10-24)

Associate Vice President of Assessment, Compliance, and Grants

The Associate VP of the ACG Office has lead responsibility for all grant-related activities at Chipola College. Responsibilities include:

- Researching and identifying grants that support the mission and priorities of the College
- Ensuring the alignment of proposed projects with Chipola College mission and priorities
- Meeting with the grants coordinator to plan, develop, and write grant applications
- Assigning and/or serving as lead writer for grant proposals
- Reviewing all grant applications for content, accurate data, grammar, and format
- Monitoring application development to ensure that grant applications are submitted to the ACG Office at least 10 business days prior to the submission deadline
- Providing final written approval of all grant applications prior to submission
- Approving and submitting requests for project activity with the project director
- Collaborating with the grants coordinator on all funded grants to conduct orientations for project management personnel
- Providing leadership and oversight for grant-funded project implementation and management
- Sharing project expenditure approval authority with the project director
- Scheduling and chairing Administrative Grant Team meetings
- Evaluating project deliverables and outcomes

⚑ **REMINDER:** The Associate VP of ACG must provide final written approval before any grant application is submitted on behalf of the College. See CAP 1.4.

Grants Coordinator

The Grants Coordinator collaborates with the Associate VP of ACG to carry out the grant responsibilities of the ACG Office. Responsibilities include:

- Researching legislative and/or funding agency changes that impact grant operations of the College
- Writing grant applications or portions of grant applications as assigned by the Associate VP of ACG
- Collaborating with the Associate VP of ACG to ensure grant proposals meet all grant criteria
- Conducting grant orientation meetings with the Project Management Team
- Ensuring that publicity requirements of the funding agency are met
- Assisting the project director and Project Management Team in monitoring grant-funded activities and expenditures are carried out in accordance with funding agency requirements
- Submitting purchase requisitions in accordance with College administrative and business office procedures
- Monitoring the grant budget to ensure funds are used in accordance with the budget approved by the funding agency
- Assisting with development and submission of requests to modify project activities and budgets
- Coordinating with the Associate VP of ACG, VP of Administrative and Business Affairs, and the project director to develop, prepare, and submit all required grant activity, fiscal, and program reports in a timely manner
- Maintaining updated grant and project status summary records
- Maintaining copies of complete grant-funded project files in accordance with funding agency requirements

Project Director (Dean/Director of the Department)

The Project Director serves as principal investigator and bears responsibility for successfully implementing and carrying out the approved activities and expenditures of the grant-funded project. Responsibilities include:

- Forming and leading a Project Management Team to carry out project activities and expenditures in a timely manner and in accordance with grant requirements
- Holding regular meetings of the Project Management Team (twice each semester during the grant period) and submitting meeting minutes to the Associate VP of ACG within one week
- Presenting status of project activities, expenditures, and timelines at Administrative Grant Team meetings
- Ensuring that project activities and expenditures are carried out in accordance with funding agency requirements
- Assisting with the development of bid specifications and solicitation of quotes
- Submitting purchase requisitions in accordance with College administrative and business office procedures
- Sharing project expenditure approval authority with the Associate VP of ACG
- Developing and submitting grant activity and fiscal reports as required by the Associate VP of ACG and the VP of Administrative and Business Affairs
- Ensuring that deliverables and anticipated project outcomes are achieved
- Maintaining electronic copies of complete project files in accordance with funding agency requirements

Project Management Team (PMT)

The Project Management Team implements all grant activities and expenditures under direction of the project director. Members include the project director (chairperson), the grants coordinator, and department faculty and staff designated by the project director. The PMT meets a minimum of twice per semester during the duration of the grant and provides minutes to the Associate VP of ACG within one week of each meeting.

Grants Accountant

The Grants Accountant, within the Office of Administrative and Business Affairs, provides fiscal management support for all grant-funded projects. Responsibilities include:

- Establishing the internal account for operating the grant-funded project in Jenzabar, the College's administrative software
- Presenting procedures for grant expenditures and fiscal requirements to the Project Management Team during orientation
- Advising the Associate VP of ACG on issues pertaining to expenditures and budgets
- Maintaining current and accurate records of grant expenditures and balances
- Documenting expenditure of matching funds (cash or in-kind) to ensure College match obligations are met
- Conducting internal grant audits, including sub-recipients

THE GRANT PROCESS

Identification of Grant Opportunities

Chipola College is committed to pursuing external funds for projects and activities that support its mission and address its priorities. This commitment establishes the parameters that guide the search for grant opportunities as identified by faculty, staff, administrators, the ACG office, or other interested parties. Regardless of who identifies potential grant opportunities, the ACG office is responsible for overseeing the development and submission of all grant applications on behalf of the College.

Potential grant opportunities should be immediately shared with the ACG Office so that eligibility, alignment with institutional priorities, and capacity to implement may be assessed. Staff members who identify a grant opportunity should develop a brief concept paper or notes addressing the following questions (per CAP 1.4, Grant Proposals):

- WHO? Who will lead the project (project director)? Who will participate?
- WHICH? Which funding agency or source will fund the project?
- WHAT? What will be the goal of the project? What are the major activities?
- WHEN? When will the major activities of the project occur?
- WHY? Why does Chipola College need this project?
- HOW? How will the project help the College carry out its mission?

Authority: CAP 1.4, Grant Proposals (Revised 1-10-24)

Gaining Approval to Submit

Once a grant opportunity has been identified, the project director contacts the ACG Office to discuss the potential proposal. The ACG Office convenes a meeting of the Administrative Grant Team. At this meeting, the project director or Associate VP of ACG brings plans for goals, activities, and costs for the grant to the AGT for discussion. Proposed activities must produce results aligned with the priorities of the funding agency as well as the mission, goals, and priorities of the College.

AGT approval is required before additional steps are taken in developing a grant proposal. Approval is documented through team members' signatures on the CAP 1.4, Attachment A form. If the grant is approved for submission, the Associate VP of ACG notifies the grants coordinator.

⚑ **REMINDER:** No grant proposal may be submitted on behalf of Chipola College without final written approval from the Associate VP of ACG and AGT approval documented on CAP 1.4 Attachment A.

Planning and Writing the Proposal

Early in the process, the ACG Office convenes a meeting of the Project Management Team to discuss the development of the identified grant solicitation. The team develops its approach to creating the grant proposal, including providing relevant information for planning goals, objectives, activities, deliverables, costs, and outcomes.

The grants coordinator collaborates with the Associate VP of ACG, the project director, and any other individuals assigned tasks for the grant application process. The Associate VP of ACG assigns or takes on lead writer responsibilities. Proposals must adhere to guidelines as outlined in the solicitation for grant applications published by the funding agency. After working closely with the Associate VP of ACG on the development of the grant, the grants coordinator or other assigned personnel submits the completed draft application for review to the Associate VP of ACG at least 10 business days prior to the submission deadline.

The draft application is reviewed for content, accurate data, grammar, and format. The draft is returned to the appropriate person for revisions, who then provides a clean, revised copy to the Associate VP of ACG. After careful collaboration, the approved application is submitted.

Submitting the Proposal

The Associate VP of the ACG Office is responsible for ensuring that all proposals are complete, accurate, and submitted in accordance with funding agency requirements.

⚑ **REMINDER:** All federal, state, and local conflict of interest provisions apply to Chipola's grant procurement, administration, and management. See Chipola Policy 1.007 (Conflict of Interest), citing §§ 112.311 and 112.317, Florida Statutes.

IMPLEMENTING AND MANAGING THE PROJECT

Post-Award Notification and Budget Packet

The grant award notification is typically sent to the College president, especially if the award is from a federal agency. As soon as the award notification or signed contract is received, the grants coordinator, in close collaboration with the Associate VP of ACG, submits a budget packet to the Vice President of Administrative and Business Affairs consisting of the following items:

- Board agenda item (if applicable)
- Official award notification or original contract
- Copy of the approved proposal
- Contracts for approved signatures
- Project budget
- Personnel position authorization and benefits spreadsheet (if salaries and benefits will be paid from grant funds)
- Other documents pertinent to project fiscal matters

Important: Funds in the project budget cannot be accessed until the above documents are received by the Vice President of Administrative and Business Affairs and notification to proceed is given to the Associate VP of ACG and the project director.

Project Implementation Steps

- The Associate VP of ACG notifies the College president and other involved parties of the grant award.
- The grants coordinator sends a budget packet to the Vice President of Administrative and Business Affairs.
- The grants coordinator initiates the budget request and personnel position authorization.
- The VP of Administrative and Business Affairs or the grant accountant sets up the project budget, assigns a project number, and provides the number to the grants coordinator, project director, and Associate VP of ACG.
- The project director reconvenes the Project Management Team.
- The grants coordinator convenes an orientation meeting with the Project Management Team, project director, and grants accountant. This meeting focuses on project activities, timelines, deliverables, outcomes, fiscal processes, budget, and reporting, including a review of funding agency and College guidelines and requirements.
- The Associate Vice President of Human Resources and the Vice President of Administrative and Business Affairs implement personnel authorizations funded by the grant, if applicable.
- After the account number is received by the project director and grant-funded positions are authorized, applicable personnel continue project implementation following college policies and procedures.

⚑ **REMINDER:** All project files are to be backed up weekly and stored electronically on a secure college network drive.

Publicity of Grant Award

Some funding agencies, especially federal agencies, have policies requiring that the agency is credited on materials and in other publicity efforts. The grants coordinator is responsible for ensuring that publicity requirements are met. For federally funded programs, materials must comply with applicable agency branding and acknowledgment requirements.

⚑ **REMINDER:** All equipment purchased with federal grant funds must be properly identified with a disclaimer noting federal funding. The grants coordinator can assist with compliance labeling requirements. See 2 CFR § 200.313.

Marketing Materials Purchased with Grant Funds

Some grants — such as those funded by the U.S. Department of Labor or a foundation — may have very specific marketing requirements. Those marketing requirements must be followed explicitly. A statement indicating the source of funds must be printed on materials or otherwise stated, as applicable. The grants coordinator can provide the specific requirements for each grant.

Monitoring Sub-recipients

As required by the Federal Uniform Grant Guidance (2 CFR § 200.331–200.333), Chipola College monitors sub-recipients to whom it passes federal awards. The project director collaborates with the grants coordinator to develop a monitoring schedule. Monitoring reviews may be informal or formal:

- Informal reviews: Conducted by the project director through email, quarterly meetings, and onsite visits.
- Formal reviews: Organized by the ACG office and administrative and business affairs office to ensure proper internal controls are in place and applicable fiscal policies, procedures, and rules are followed.

⚑ **REMINDER:** Monitoring reviews must be conducted at least once per year, or more often if required by the funding agency. Documentation of monitoring activities must be maintained in the project file.

BASIC COST PRINCIPLES

Note: This section provides general guidance and does not include the full text of official rules and regulations governing grant-funded project expenditures. Any information in this section is superseded by the rules and regulations of the funding agency. When the rules and regulations of agencies conflict, the more restrictive provisions apply. See 2 CFR Part 200 Subpart E (Cost Principles) and the Florida DOE Green Book of Regulations.

Overview

Cost principles are the basic guidelines describing permissible ways in which grant funds may be spent. Projects may be funded based on cost-reimbursement, cash advance, quarterly invoice, or a performance-based contract. Allowable costs must be:

- Necessary and reasonable for the performance of the federal award
- Allocable to the grant
- Consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the College
- Consistent with generally accepted accounting principles
- Not used as cost-sharing or matching in any other grant agreement (unless specified otherwise by the federal agency)
- Adequately documented
- Legal under state and local law

Authority: 2 CFR § 200.405–200.406; Florida DOE Green Book of Regulations

Project Budget and Cost Controls

Project personnel and administrators must be familiar with the project budget and cost principles. Funds can be spent only for items or activities listed in the approved budget. Adding new line items or personnel usually requires a budget amendment approved by the funding agency.

⚑ **REMINDER:** The notification of grant award will identify any special conditions or considerations for costs, such as large equipment purchases and the process for pre-approval and initiation of bid and purchase order processes.

Cash and In-Kind Matches

Cash and in-kind matches from grant seekers are often required by the funding agency and must be approved by the College president. The project director must coordinate with the administrative and business affairs office to ensure matching funds are properly identified and expended. Matching contributions must meet the standards of 2 CFR § 200.306.

Indirect Costs

Indirect costs (also referred to as institutional overhead, or Facilities and Administrative — F&A — costs) cover expenses such as utilities, facilities, and other administrative costs that are real costs of doing business but are not readily identified with a particular sponsored project. Chipola College does not have an approved or established indirect cost rate. Pursuant to 2 CFR § 200.414(f), an institution without a negotiated indirect cost rate may elect to charge a de minimis rate of 10 percent of Modified Total Direct Costs (MTDC). Most federal and state funding agencies cap the indirect cost rate and publish the rate in the solicitation for grant applications.

Important: Indirect costs appearing in the approved budget are not accessible for direct project expenditures. All indirect (administrative) costs must be charged to the appropriate indirect cost category and not to direct project budget line items.

Leveraged Resources

Many funding agencies require documentation of what resources the institution brings to the proposed project. Examples of leveraged resources include staff time, project materials, scholarships, and marketing resources. The administrative and business affairs office and the grants coordinator assist with establishing, tracking, and reporting leveraged funds and activities. See 2 CFR § 200.306 for federal matching and cost sharing standards.

Travel

For grant funds to be used for travel expenses, travel must be an approved line item in the project budget. Most grant guidance will stipulate whether in-district, out-of-district, or out-of-state travel is allowable. Grant-funded travel is subject to Section 112.061, Florida Statutes (travel expenses of public officers and employees). All travel must be pre-authorized.

- Airline tickets are to be purchased with a College Procurement Card (P-Card) or personal credit card with prior authorization.
- Personnel whose travel is funded by the grant must attend the travel events identified in the approved budget.

⚑ **REMINDER:** Even though travel is included in the budget, the funding agency may require prior approval for specific trips. Personnel should refer to the project contract or award document before booking travel.

Unallowable Costs

An unallowable cost is any cost that cannot be charged to the grant regardless of whether the cost is treated as a direct or indirect cost. Guidance on unallowable costs is provided by the funding agency. Note that while a cost may be allowable under federal regulations, it may not be allowable under the terms and conditions of a specific grant program or state regulations. The most restrictive regulations apply, whether federal, state, or institutional. Specific unallowable costs include, but are not limited to:

- **Alcoholic beverages:** Purchase of alcoholic beverages is prohibited on all grant funds.
- **Food purchases:** Prohibited unless specifically included in the project budget approved by the funding agency.
- **Entertainment:** Generally unallowable under 2 CFR § 200.438.
- **Lobbying:** No federal appropriated funds may be used to influence federal legislative or executive actions. See 31 U.S.C. § 1352 and applicable Lobbying Certification forms.

Authority: 2 CFR §§ 200.420–200.475; Florida DOE Green Book of Regulations

TIME AND EFFORT REPORTING

Time and effort reports are required to confirm the percentage of work time a person devotes to fulfilling his or her responsibilities for a grant-funded project. This requirement applies to all employees, including faculty, whose salaries are fully or partially paid with grant funds. Accurate time and effort documentation is required by 2 CFR § 200.430 (Standards for Documentation of Personnel Expenses).

Key requirements include:

- If an instructor's salary is paid with grant funds, the instructor must spend at least 50% of his or her time working on the grant-funded project.
- Time and effort must be properly documented and accounted for on a consistent basis, consistent with generally accepted accounting principles.
- Records must reflect the actual activity of each employee.
- Documentation must be signed by the employee or a supervisor with first-hand knowledge of the work performed.

The grants coordinator can assist the project director to ensure correct and accurate reporting of employees' time and effort. A Time and Effort Reporting form is available from the ACG Office.

⚑ **REMINDER:** Federal auditors routinely examine time and effort records. Incomplete or inaccurate records are among the most common causes of audit findings on federal grants. Maintain all time and effort documentation throughout the grant period and for the required record retention period.

BUDGETS

Overview

The project director and other designated project team members must become familiar with hiring, purchasing, and other fiscal procedures for the expenditure and accounting of project funds. During the Project Management Team orientation, the grants accountant reviews procedures for making expenditures and maintaining fiscal integrity. Budget information may be accessed through Jenzabar, the College's administrative software.

The project director and grants coordinator closely collaborates with the grants accountant on matters pertaining to processing payroll documents, disbursement requests, invoices, purchases, fiscal reports, and other related fiscal matters.

The project director and grants coordinator must confirm whether the funding agency requires prior approval before making equipment purchases. Many agencies require pre-approval, and all equipment should be purchased in the first year of the project if possible.

⚑ **REMINDER:** Project funds must be spent in a timely manner. All expenses should be encumbered at least 60 days prior to the end of the budget period.

Budget Rules and Regulations

Specific rules and regulations apply to grant-funded projects. For federal grant-funded projects, the following may apply:

- 2 CFR Part 200 — Office of Management and Budget (OMB) Uniform Grant Guidance
- EDGAR (34 CFR) — Education Department General Administrative Regulations, applicable to U.S. Department of Education grants
- Federal Uniform Grant Guidance (UGG) — Cross-cutting standards for all federal awards

For state-funded programs, rules and regulations may be found in:

- The Green Book of Regulations from the Florida Department of Education
- Accounting Manual for Florida's College System
- Florida Statutes, including Chapter 1001 (Florida College System)
- Florida Administrative Code, Title 6A (State Board of Education)

⚑ **REMINDER:** Federal regulations supersede other agency regulations unless the other agency regulations are more restrictive. The grants coordinator can assist with any questions regarding applicable regulatory frameworks.

Contingency Budgets

Grants that continue with annual award cycles (such as the Carl D. Perkins grant under 20 U.S.C. § 2301 et seq.) may require a contingency budget to continue employment of project personnel without a break in service. The contingency budget is typically limited to personnel costs and may be required when there is a delay in receipt of an official notification for a continuing project. The project director should contact the Vice President of Administrative and Business Affairs at least 30 days prior to the end of the project to ensure that a contingency budget has been established.

Documentation of Expenditures

The project director and grants coordinator are to retain documentation of all expenditures. Copies of originals are to be scanned and forwarded to the individual(s) responsible for completing the purchasing process. The scan of originals is to be retained as an electronic file.

⚑ **REMINDER:** The project budget account number must be included on all grant-related transactions.

PURCHASING

Overview

The spending of grant funds must follow college policies and procedures and comply with funding agency requirements. Applicable policies include Chipola College Board Policy 5.160 (Purchasing) (Authority: § 287.017 F.S.; FAC 6A-14.0734) and CAP 5.1 (Administrative Procedure for Purchasing). The administrative and business affairs office publishes and distributes alerts pertaining to fiscal policies and procedures. Purchase requisitions must be approved by the project director and the Associate VP of ACG.

⚑ **REMINDER:** No equipment, supplies, or services may be purchased until the College has received a fully executed copy of the grant agreement and/or any applicable amendments or modifications.

⚑ **REMINDER:** No purchases of equipment, supplies, or services should occur prior to issuance of a college purchase order, even if a college administrator has signed a contract.

⚑ **REMINDER:** Because Chipola College is a political subdivision of the State of Florida, all purchases must comply with Florida Statutes and State Board of Education rules, even if a supplier's name appears in a grant solicitation. Named suppliers in a grant do NOT constitute sole source authorization. All procurement procedures must still be followed.

Signature Authorization

Signature authorization by the College president is required for grant contracts, Memoranda of Understanding (MOUs), and agreements. Only the president is authorized to sign contracts and agreements on behalf of the College. See Chipola College Board Policy and applicable Florida College System governance requirements under § 1001.64, Florida Statutes.

Payment for Grant Purchases

The College uses purchase orders as the primary method for procurement. A valid purchase order is required for payment when applicable. Upon receipt of purchased items or services, the project director is responsible for submitting the shipping label, invoice, or other documentation to the administrative and business affairs office for payment of the purchase order.

Items and Services Requiring Quotes or Bids [REVISED OCTOBER 2026]

Per Chipola College Board Policy 5.160 and CAP 5.1 (Purchasing), the following bidding and quote requirements apply:

- **Formal bids:** At least three formal bids shall be obtained for purchases exceeding the threshold specified in Board Policy 5.160(1)(A). The three-bid requirement is waived for items listed as exceptions in Florida State Board of Education Administrative Rule 6A-14.0734(2).
- **Written quotes:** Written quotes from three (3) sources are recommended for purchases over $15,000 but below the Board Policy threshold (i.e., $65,000).
- **Waiver of quotes:** The president or designee may waive the requirement for quotes for purchases below $65,000 from a sole source provider, when competition is limited, when a provider has unique skills, or when a specific product is deemed most beneficial to the College.

Authority: Board Policy 5.160; CAP 5.1; § 287.017 F.S.; FAC 6A-14.0734

Federal and State Contracting Requirements for Small and Minority Businesses [NEW — ADDED AUGUST 2026]

The College takes affirmative steps to ensure that small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms are given the opportunity to participate in College procurement whenever possible. Per 2 CFR § 200.321, such steps include placing qualifying firms on solicitation lists, soliciting them whenever they are potential sources, dividing procurements into smaller lots to permit maximum participation when economically feasible, establishing delivery schedules that encourage their participation, using the services of the Small Business Administration and the Minority Business Development Agency, and requiring contractors under a federal award to apply the same practices to their subcontracts. The full text of 2 CFR § 200.321 is provided in Appendix A.

For construction contracts specifically, § 255.102, Florida Statutes (Contractor Utilization of Minority Business Enterprises), requires the College to consider price preferences, weighted preference formulas, or other appropriate preferences to increase minority participation, and to evaluate a contractor's good-faith efforts toward minority business enterprise participation using the factors adopted by the Florida Office of Supplier Diversity. The full text of § 255.102, Florida Statutes, is provided in Appendix B.

⚑ **REMINDER:** Project directors and the ACG Office should confirm that solicitations for grant-funded construction and other applicable contracts document consideration of small and minority business participation consistent with 2 CFR § 200.321 and, for construction contracts, § 255.102, Florida Statutes. See Appendix A and Appendix B.

Suspension and Debarment Screening [NEW — ADDED AUGUST 2026]

Before making any purchase expected to equal or exceed $25,000 that will be paid for in whole or in part with federal grant funds, the Program Director, Grants Coordinator, or Business Office must verify at www.sam.gov that the selected vendor and its principals are not suspended, debarred, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions, per 2 CFR § 200.214. While this $25,000 threshold governs mandatory pre-purchase screening, the College recommends screening any new or unfamiliar vendor supplying federally funded goods or services as a best practice, regardless of dollar amount. For purchases made with state funds or state term contracts, the vendor must also be confirmed clear of the Florida Suspended Vendor List under § 287.1351, Florida Statutes; the Business Office separately checks new vendors against SAM.gov, the Florida Suspended Vendor List, and MyFloridaMarketPlace before the vendor is set up in Jenzabar.

Search results (a screen print, saved PDF, or exported SAM.gov result) are retained in the grant purchasing file together with the completed Vendor Suspension & Debarment Screening Checklist (Appendix H), which is attached to the purchase order or check request. Twice per year, the Grants Coordinator cross-checks all active federally funded vendors against SAM.gov as a secondary control; any match is reported immediately to the Business Office and the Associate Vice President of Assessment, Compliance, and Grants for corrective action. Records are retained per the College's grant records retention schedule (generally a minimum of six years after grant closeout, or longer if required by the specific award).

⚑ **REMINDER:** A vendor found to be suspended, debarred, or on the Florida Suspended Vendor List may not be used, regardless of dollar amount, until removed from the applicable list. See Appendix H for the screening checklist and required documentation.

Authority: 2 CFR § 200.214; § 287.1351, F.S.

State Contract Affecting Purchases

Because of volume, state contract prices and other State of Florida agency contracts and consortia-based pricing initiatives are frequently much lower than could be negotiated by individual institutions. Bidding requirements may be waived when purchasing items on the state contract list if allowed by the granting agency. See § 287.056, Florida Statutes (Purchases from State Contracts).

Documents Upon Receipt of Purchased Items

Purchased items are often shipped to the physical plant office. Packing slips and other related documents must be sent to the physical plant office if an item is delivered to a different location. Physical plant personnel will attach property control bar code decals to equipment as required.

⚑ **REMINDER:** The College will track in inventory all “digital property” with a value of one thousand dollars ($1,000) or more per CAP 5.1 (Purchasing).

⚑ **REMINDER:** The College conducts an annual 100 percent physical inventory of all property. Equipment purchased with grant funds must be properly tagged and tracked per 2 CFR § 200.313 and Florida Administrative Code Rule 69I-72.003 (Recording of Property).

Disposing or Transferring Equipment Purchased with Grant Funds

Funding agencies often require prior approval before disposal or transfer of ownership of equipment purchased with grant funds. Federal agencies typically require prior approval per 2 CFR § 200.313. The grants coordinator must be consulted before any such disposition occurs. See also FAC Rule 69I-72.003 for Florida state requirements on recording and disposal of property.

⚑ **REMINDER:** Some funding agencies, such as the U.S. Department of Labor, require a second phase of approval on equipment purchases that includes the bid process before a purchase can be made, even if a budget line item exists.

DAVIS-BACON AND FEDERAL LABOR STANDARDS [REVISED SEPTEMBER 2026]

When Chipola College uses federal grant funds for construction contracts, those contracts and subcontracts must comply with the Davis-Bacon Act and related federal labor standards. Section 3 requirements under 24 CFR Part 75 are separate from Davis-Bacon; the two are administered together on HUD-assisted construction but have distinct thresholds, benchmarks, and reporting.

Purpose and Designation

The Office of Assessment, Compliance, and Grants (ACG) is the College office responsible for federal labor standards compliance on grant-funded construction. Where the College awards a covered contract, the ACG Office coordinates with the pass-through entity's Labor Standards Officer and administers compliance in accordance with that entity's labor standards procedures, which control where they differ from this section.

Determining Coverage

Davis-Bacon requirements do not apply to every federally funded contract. Before any construction, alteration, or repair work is solicited under a federal award, the ACG Office determines in writing whether Davis-Bacon applies and records the determination in the project file. Coverage attaches where:

- the contract is for construction, alteration, or repair, including painting and decorating, performed at the site of the work as defined at 29 CFR 5.2;
- the prime contract exceeds $2,000 (40 U.S.C. § 3142(a)); and
- the authorizing statute for the funding program applies Davis-Bacon standards.

Program-specific application:

- **CDBG and CDBG-DR —** covered through Section 110 of the Housing and Community Development Act of 1974 (42 U.S.C. § 5310). Residential rehabilitation is covered only where the property contains eight or more units.
- **FEMA Public Assistance and Hazard Mitigation Assistance —** not covered. Davis-Bacon does not attach to these procurements.
- **Blended funding —** where funds from more than one program support a single construction contract, coverage follows the covered funding source and applies to the contract as a whole.

The Contract Work Hours and Safety Standards Act (CWHSSA) applies separately to contracts exceeding $100,000 that employ laborers or mechanics, and the Copeland Anti-Kickback Act applies to all Davis-Bacon-covered contracts.

Where coverage is uncertain, the ACG Office requests written guidance from the awarding or pass-through agency before the solicitation is issued.

Wage Determinations

The ACG Office obtains the applicable general wage determination from SAM.gov and includes it in the solicitation. Award is conditioned on the contractor's acceptance of the wage determination.

- A revised wage determination is effective if issued at least 10 calendar days before bid opening. If issued later, the agency may proceed on the earlier determination only if it documents in the contract file that there was insufficient time to notify bidders (29 CFR 1.6(c)(3)).
- If a contract is not awarded within 90 days after bid opening, any wage determination revision issued before award becomes effective unless an extension is obtained from the Wage and Hour Administrator (29 CFR 1.6(c)(3)).
- Where a contract is substantially modified to include additional construction, or an option is exercised, the most recent revision of the applicable wage determination is incorporated at that time.

⚑ **REMINDER:** The provision that automatically applied Davis-Bacon clauses to contracts from which they were omitted (29 CFR 5.5(e)) was vacated nationwide on June 24, 2026. Omission cannot be assumed curable — the wage determination and required clauses must be in the solicitation and in the executed contract. This step is not delegated or deferred.

Required Contract Provisions

Covered contracts and all subcontracts incorporate the clauses required by 29 CFR 5.5 and 2 CFR Part 200, Appendix II, including:

- **Minimum wages —** laborers and mechanics paid unconditionally, not less often than weekly, at rates not less than those in the wage determination, including fringe benefits (29 CFR 5.5(a)(1)).
- **Posting —** the wage determination and the Davis-Bacon poster (WH-1321) posted at the site of the work at all times, in a prominent and accessible place (29 CFR 5.5(a)(1)(i)).
- **Additional classifications —** classifications not listed in the wage determination are conformed through the contracting officer by request to the Wage and Hour Administrator, who approves, modifies, or disapproves within 30 days of receipt (29 CFR 5.5(a)(1)(iii)).
- **Withholding —** the College may withhold accrued payments, including retainage, as necessary to satisfy wage liabilities (29 CFR 5.5(a)(2)).
- **Payrolls and basic records —** weekly certified payrolls, retained three years (29 CFR 5.5(a)(3)).
- **Apprentices and trainees —** permitted at less than the predetermined rate only when registered with the Office of Apprenticeship or a State Apprenticeship Agency, within the registered ratios (29 CFR 5.5(a)(4)).
- **Copeland Anti-Kickback Act —** compliance with 29 CFR Part 3 (29 CFR 5.5(a)(5)).
- **Subcontract flow-down —** the clauses inserted in every subcontract; the prime contractor is responsible for subcontractor compliance (29 CFR 5.5(a)(6)).
- **Termination and debarment —** breach may be grounds for termination and debarment (29 CFR 5.5(a)(7); 29 CFR 5.12).
- **Disputes and certification of eligibility —** 29 CFR 5.5(a)(9) and (a)(10).
- **Anti-retaliation —** workers may not be discharged, demoted, intimidated, blacklisted, or otherwise discriminated against for reporting violations, filing complaints, cooperating with an investigation, or informing others of their rights (29 CFR 5.5(a)(11)).
- **CWHSSA —** on contracts over $100,000, overtime at not less than one and one-half times the basic rate for hours over 40 in a workweek, with liquidated damages of $33 per worker for each calendar day of violation, an amount adjusted annually for inflation (29 CFR 5.5(b)).

Prior to award, the ACG Office verifies the contractor's and known subcontractors' eligibility in SAM (2 CFR § 200.214).

Preconstruction

Before construction begins, the ACG Office confirms with the prime contractor its labor standards obligations, the applicable wage determination, payroll submission requirements, and the posting requirements, and documents that confirmation in the project file.

Certified Payrolls

The contractor and each subcontractor submit a certified payroll weekly for each week in which covered work is performed, using Optional Form WH-347 or an equivalent format, accompanied by the signed Statement of Compliance required by 29 CFR Part 3 and 29 CFR 5.5(a)(3)(ii). HUD guidance directs that payrolls be submitted generally within one week after the close of the payroll period.

The ACG Office reviews payrolls for correct classifications, rates not less than the wage determination, proper fringe benefit treatment, overtime, permissible deductions, and arithmetic accuracy, and documents each review. Payments may be suspended after written notice where payrolls are not submitted.

On-Site Monitoring and Employee Interviews

For each covered contract, the ACG Office conducts on-site visits during active construction to confirm required postings and observe worker classifications, and conducts employee interviews recorded on Form HUD-11 (Record of Employee Interview). Interviews are conducted during working hours, in a place that permits privacy, with the least practicable disruption to the work, and the worker's identity is disclosed only with prior written consent. Interview records are compared to the corresponding certified payroll period and signed and dated at the completion of that comparison.

Federal regulation does not prescribe a minimum visit frequency or interview sample size; HUD Handbook 1344.1 REV-3 directs the use of judgment in assessing when and with whom interviews are conducted. The College's minimum standard is one on-site visit with employee interviews on every covered contract, with additional visits based on project risk, including contract size, duration, number of subcontractors, prior findings, and worker complaints. Scheduling and sampling detail is maintained in the ACG desk procedure described below.

Wage Restitution and Enforcement

Where a discrepancy indicates underpayment, the ACG Office follows the procedures in HUD Handbook 1344.1 REV-3, § 5-12, and 29 CFR Part 5:

- Initial contact with the employer is informal, identifying the discrepancy and requesting explanation or correction.
- Where the matter is not resolved informally, the College issues a written determination by receipted mail stating the violation and the restitution computed as total hours worked × (Davis-Bacon rate − rate paid). The employer has 30 days to dispute the findings.
- The employer submits corrected certified payrolls documenting restitution within 30 days of notification.
- Where restitution is not made within 30 days of notice to the prime contractor, the College withholds from payments due the contractor an amount sufficient to ensure full payment.
- Back wages due a worker who cannot be located or is not paid for any reason are placed in a deposit or labor standards escrow account as a condition of project closeout (HUD Handbook 1344.1 REV-3, § 5-11(I)).
- Suspected or confirmed violations, including any indication of falsification of payrolls or willful violation, are reported to the pass-through entity, which is responsible for reporting to the federal awarding agency and, where required, the U.S. Department of Labor (2 CFR Part 200, Appendix II(D)).

Unresolved non-compliance is addressed through the notice, corrective-action-plan, escalation, and remedies process described under “Non-Compliance Correction and Enforcement,” including withholding, referral for suspension or debarment under 29 CFR 5.12, and reporting to the pass-through entity.

Recordkeeping

Labor standards records — the coverage determination, the wage determination and any conformances, the executed contract clauses, certified payrolls, Forms HUD-11, site visit documentation, correspondence, and restitution documentation — are maintained in the project file for not less than six years after grant closeout, which exceeds the three-year minimum at 29 CFR 5.5(a)(3)(i)(A).

Section 3 Compliance **[NEW — ADDED OCTOBER 2026]**

Section 3 of the Housing and Urban Development Act of 1968 requires that economic opportunities generated by HUD financial assistance be directed, to the greatest extent feasible, to low- and very low-income persons and the businesses that employ them. Section 3 is separate from Davis-Bacon and is administered alongside it.

Responsibility. The Office of Assessment, Compliance, and Grants (ACG) is responsible for Section 3 compliance. Where a consultant is engaged to administer Section 3 on a project, the engagement is made in writing. Administration may be delegated; responsibility may not (2 CFR § 200.332). The ACG Office retains the coverage determination, independent review of the administrator’s work, the project file, the report to the pass-through entity, and the closeout certification.

Coverage. Before construction is solicited under a HUD-funded award, the ACG Office determines in writing whether Section 3 applies and files the determination. Section 3 applies to public construction projects assisted with HUD housing and community development financial assistance where total assistance to the project exceeds the threshold published by HUD, currently $300,000 (24 CFR § 75.3(a)(2)). It applies to the entire project whether fully or partially HUD-assisted, to all covered HUD-funded construction and not only CDBG-DR, and to contractors and subcontractors at every tier. Projects with multiple federal funding sources are governed by 24 CFR § 75.29. “Section 3 worker,” “Targeted Section 3 worker,” and “Section 3 business concern” have the meanings given at 24 CFR §§ 75.5 and 75.21.

Contractor obligations. The Section 3 Contract Clause (Appendix E, C-537) is included in every covered contract and subcontract; compliance is required whether or not it is included (24 CFR § 75.27). Contractors and subcontractors shall direct employment, training, and contracting opportunities to Section 3 workers and Section 3 business concerns to the greatest extent feasible, with priority to Targeted Section 3 workers (24 CFR § 75.19);

certify at contract execution that no vacant positions were filled between selection and execution to circumvent Section 3; document outreach; obtain and retain an eligibility certification for each worker claimed; maintain labor-hour records for all workers on the project; and report monthly on the Section 3 Tracking Log (Appendix I).

Eligibility certification. Worker status is documented by signed certification at hire, or at the start of the first reporting period in which the worker is counted, supported by income documentation, evidence of employment by a Section 3 business concern, or evidence of YouthBuild participation, and is valid for five years (24 CFR § 75.31). The ACG Office samples certifications independently.

Benchmarks and best efforts. The safe harbor is met where Section 3 workers perform 25 percent or more of total labor hours and Targeted Section 3 workers 5 percent or more (24 CFR § 75.23). The benchmarks are a safe harbor, not a quota. Where they are not met, the College reports the qualitative efforts made to meet them — outreach, training and apprenticeship opportunities, hiring events, support services, assistance to Section 3 business concerns, and division of contracts into smaller tasks (24 CFR § 75.25). Efforts are documented as they occur.

Tracking and reporting. The College tracks and reports the total number of labor hours worked, the number worked by Section 3 workers, and the number worked by Targeted Section 3 workers, recorded on Appendix I from contract award through closeout. Good-faith estimates derived from payroll records are permitted and professional services hours may be excluded (24 CFR § 75.25). Hours are reconciled against the certified payrolls collected under the Davis-Bacon and Federal Labor Standards section. Reports are submitted to the pass-through entity on the schedule stated in the award agreement and in HUD's Section 3 reporting system where the award requires it.

Records. Section 3 records are maintained under 24 CFR §§ 75.31 and 75.33(a) and the retention periods stated in Reporting and Record Retention.

Non-Compliance Correction and Enforcement. This applies to federal labor standards and to Section 3. The ACG Office issues written notice of the deficiency with a date a response is due; obtains a written corrective action plan with completion dates; may withhold payments otherwise due, including retainage, until the deficiency is corrected, and for wage underpayment under 29 CFR § 5.5(a)(2); reports continuing non-compliance, falsification, or willful violation to the pass-through entity for referral to the federal awarding agency, the U.S. Department of Labor, or HUD; and may pursue termination for cause and referral for suspension or debarment (29 CFR § 5.12; 2 CFR Part 180; 2 CFR § 200.339). Each step is documented in the project file.

Authority: 12 U.S.C. § 1701u; 24 CFR Part 75, Subparts A, C, and D; 2 CFR § 200.332; 29 CFR Parts 3 and 5.

Operating Procedures

Detailed operating procedures — site visit scheduling, interview sampling, payroll review checklists, and the labor standards project file index — are maintained by the ACG Office as an internal desk procedure issued under the signature of the Associate Vice President of Assessment, Compliance, and Grants. Before any covered construction contract is solicited, the ACG Office obtains the applicable labor standards procedures from the pass-through entity and reconciles the desk procedure against them. The desk procedure may be revised administratively and does not require Executive Council action.

Authority: 40 U.S.C. §§ 3141–3148; 40 U.S.C. §§ 3701–3708; 18 U.S.C. § 874; 42 U.S.C. § 5310; 29 CFR Parts 1, 3, and 5; 2 CFR §§ 200.214, 200.327 and Part 200, Appendix II; 24 CFR Part 75; HUD Handbook 1344.1 REV-3 (January 2023).

EVALUATION

Formative and Summative Evaluations

Project activities and expenditures are to be monitored and outcomes evaluated as the project progresses. Key evaluation activities include:

- **Formative evaluation:** Occurs during each meeting of the Administrative Grant Team. Shortfalls in projected deliverables and outcomes should result in immediate corrective actions by the project director. Timely corrective action is essential to ensuring that project goals, objectives, and outcomes are achieved.
- **Summative evaluation:** Occurs at the end of the project to determine the degree to which project outcomes were achieved and the project was carried out in accordance with funding agency requirements. The Associate VP of ACG has lead responsibility for internal evaluation of grant-funded projects.

External Evaluators

Funding agencies sometimes require that an external evaluator be employed by the grant recipient. External evaluators must be selected through a formal bid process in compliance with 2 CFR § 200.318–200.327 and College procurement procedures. It is possible that an additional bid process will be required at the time of proposal approval. The project director should check the notification of grant award and/or consult with the assigned federal program officer. The grants coordinator can assist in securing an external evaluator.

⚑ **REMINDER:** When in doubt about evaluation requirements or any grant management question, contact the grants coordinator or Associate VP of ACG.

REPORTING AND RECORD RETENTION

Progress and Financial Reporting

Grant-funded projects require timely progress and financial reports submitted to the funding agency in accordance with the terms of the grant award. Reporting schedules and formats vary by agency. The grants coordinator assists the project director with report development and submission. Financial records must comply with 2 CFR § 200.302 (Financial Management) and, for state awards, § 218.33, Florida Statutes.

Common reporting requirements include:

- Monthly progress reports (due by the 10th calendar day of each month for many federal programs)
- Quarterly progress reports (due by the 10th of April, July, October, and January, as applicable)
- Annual performance reports as required by the funding agency
- Financial reports and budget reconciliations as required
- Final reports and closeout documentation

⚑ **REMINDER:** Failure to submit required reports in a timely manner constitutes an Event of Default under many grant agreements. The project director is responsible for ensuring reports are complete, accurate, and submitted on time.

Record Retention

Grant records must be retained in accordance with applicable federal and state requirements. Under 2 CFR § 200.334, financial records, supporting documents, statistical records, and all other grant records shall be retained for a period of three (3) years from the date of submission of the final expenditure report, or, if applicable, from the date of any required reporting or final payment. For federal awards passed through the Florida Department of Economic Opportunity (DEO), records must be retained for five (5) years from the date the audit report is issued, or six (6) state fiscal years after all reporting requirements are satisfied and final payments have been received, whichever is longer. For CDBG-DR awards, records must be retained for not less than six (6) years after grant closeout. Audit working papers must be available for six (6) years from the date the audit report is issued.

Records must be retained longer if any litigation, claim, negotiation, audit, or other action involving the records has been started before expiration of the controlling retention period. Records relating to non-expendable personal property valued at $1,000 or more at acquisition shall be retained for six (6) years after final disposition.

Authority: 2 CFR § 200.334; § 215.97 F.S.; Rules of the Florida Auditor General Chapters 10.550 and 10.650

Audit Requirements

Chipola College is subject to a Single Audit pursuant to 2 CFR Part 200 Subpart F (Audit Requirements) if it expends $750,000 or more in federal awards during its fiscal year. Florida state award recipients expending $750,000 or more in state financial assistance are subject to an audit pursuant to § 215.97, Florida Statutes (Florida Single Audit Act).

Audit findings must be addressed promptly. The grants coordinator collaborates with the grants accountant and Vice President of Administrative and Business Affairs to respond to audit findings and implement corrective actions.

⚑ **REMINDER:** Representatives of funding agencies, the Florida Chief Financial Officer, the Florida Auditor General, and the Florida Office of Program Policy Analysis and Government Accountability all have the right to audit grant records upon request.

CONFLICT OF INTEREST AND ETHICS

Members of the Chipola College Board of Trustees and all employees must comply with Part III of Chapter 112, Florida Statutes (Code of Ethics for Public Officers and Employees), as incorporated in Chipola College Policy 1.007 (Conflict of Interest) (Authority: §§ 112.311 and 112.317, F.S.). All decisions must be based on promoting the best interests of the College and the public good.

For federal grant purposes, conflict of interest standards are governed by 2 CFR § 200.318(c). No employee, officer, or agent of the College may participate in the selection, award, or administration of a contract supported by a federal award if they have a real or apparent conflict of interest. Such a conflict arises when the employee, officer, or agent — or any member of their immediate family, partner, or an organization that employs or is about to employ any of those parties — has a financial or other interest in a firm considered for a contract.

Officers, employees, and agents of the College shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

Any perceived fraud or conflict of interest must be reported immediately to Human Resources as required by Chipola College Policy 1.006 (Fraud). Persons may also use the College's Ethics and Compliance Hotline to report anonymously.

⚑ **REMINDER:** All federal, state, and local conflict of interest provisions apply to Chipola's grant procurement, administration, and management policies and procedures. Violations are subject to penalties under § 112.317, Florida Statutes.

Lobbying Prohibitions

No federal appropriated funds may be paid to any person for influencing or attempting to influence an officer or employee of any federal agency, a Member of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, grant, loan, or cooperative agreement. This prohibition is required by Section 1352, Title 31, U.S. Code. Any person who fails to file the required lobbying certification is subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

When required by the funding agency, Chipola College will complete and submit Standard Form-LLL ('Disclosure Form to Report Lobbying') in accordance with its instructions.

Authority: 31 U.S.C. § 1352; Standard Form-LLL; applicable federal grant certifications

GRANT CLOSEOUT

Grant closeout must be completed in accordance with the terms of the grant award and applicable regulations. Per 2 CFR § 200.344, closeout activities include:

- Submission of all required final financial, performance, and other reports
- Making final payments and liquidating all obligations
- Returning all unused materials, equipment, unspent cash advances, program income balances, and accounts receivable to the grantor as required
- Completing all required equipment disposition and transfer documentation
- Determining custodianship and retention of records

For grants administered through the Florida DEO or other state agencies, closeout reports and documentation must be submitted within sixty (60) calendar days of the final effective day of the agreement or the date of termination, whichever is earlier.

The grants coordinator collaborates with the project director and grants accountant to ensure all closeout activities are completed accurately and on time.

⚑ **REMINDER:** Incomplete or late closeout documentation can jeopardize future funding from the same agency. Begin closeout activities at least 90 days before the grant end date.

QUICK REGULATORY REFERENCE

The following table summarizes key regulatory authorities governing Chipola College's grant management activities.

*Rows shaded gold and marked **[NEW]** below were added in this revision (August 2026).*

Topic	Authority	Citation
Uniform Grant Guidance	Federal cost principles, admin. requirements, audit	2 CFR Part 200
EDGAR	Dept. of Education grant regulations	34 CFR; EDGAR
Single Audit	Federal audit threshold ($750,000)	2 CFR Part 200 Subpart F
Florida Single Audit Act	State audit threshold ($750,000)	§ 215.97 F.S.
Cost Principles	Allowable/unallowable costs	2 CFR §§ 200.405–200.475
Personnel Costs	Time and effort documentation	2 CFR § 200.430
Equipment	Property records and disposition	2 CFR § 200.313
Procurement	Competitive bidding and procurement	2 CFR §§ 200.318–200.327
Small/Minority Business Contracting **[NEW]**	Affirmative steps for small, minority, women-owned, veteran-owned, and labor surplus firms	2 CFR § 200.321 (App. A)
Minority Business Utilization (Construction) **[NEW]**	Price preference / good-faith effort standards for construction contracts	§ 255.102 F.S. (App. B)
Suspension & Debarment Screening **[NEW]**	Pre-purchase vendor exclusion screening ($25,000+ federal)	2 CFR § 200.214 (App. H)
Florida Suspended Vendor List **[NEW]**	State suspended vendor prohibition	§ 287.1351 F.S. (App. H)
Matching / Cost Sharing	Match and leveraged resources	2 CFR § 200.306
Record Retention	Federal record retention periods	2 CFR § 200.334
Grant Closeout	Closeout procedures	2 CFR § 200.344
Conflict of Interest	Ethics for public officers	§§ 112.311, 112.317 F.S.
Conflict of Interest (Federal)	Federal COI standards	2 CFR § 200.318(c)
Lobbying Prohibition	Anti-lobbying certification	31 U.S.C. § 1352
Purchasing (State)	Bids, quotes, procurement	§ 287.017 F.S.; FAC 6A-14.0734
Travel	Public officer travel expenses	§ 112.061 F.S.
Grant Proposals (CAP)	Chipola procedure for proposals	CAP 1.4 (Rev. 1-10-24)
Purchasing (CAP)	Chipola purchasing procedure	CAP 5.1 (Rev. 10-15-26)
Conflict of Interest (Policy)	Chipola COI policy	Chipola Policy 1.007
Fraud Policy	Chipola fraud and ethics	Chipola Policy 1.006
Purchasing (Policy)	Chipola purchasing policy	Chipola Policy 5.160
Property Recording	State property records	FAC Rule 69I-72.003
Florida College System	Governance of FCS institutions	Chapter 1001 F.S.
Sub-recipient Monitoring	Pass-through entity requirements	2 CFR §§ 200.331–200.333
Perkins Act	Vocational education funding	20 U.S.C. § 2301 et seq.
Section 3 (Construction) **[REVISED OCTOBER 2026]**	Economic opportunity for low-income persons on HUD-assisted construction	24 CFR Part 75; C-537 (App. E); App. I

Davis-Bacon Act **[REVISED SEPTEMBER 2026]**	Prevailing wage requirements on federally-assisted construction	40 U.S.C. §§ 3141–3148; 29 CFR Parts 1, 3, 5; HUD Handbook 1344.1 REV-3
Federal Contract Provisions (Construction) **[NEW]**	Required clauses in non-federal entity contracts	2 CFR Part 200, App. II (App. C)
CDBG Supplemental Conditions **[NEW]**	FloridaCommerce construction contract conditions	Form SC-66 / C-536 (App. D)

CONTACT INFORMATION

For questions regarding grant identification, application development, compliance, or post-award management, contact the Office of Assessment, Compliance, and Grants:

Office: Office of Assessment, Compliance, and Grants (ACG)

Institution: Chipola College

Address: 3094 Indian Circle, Marianna, FL 32446

Phone: (850) 718-2200

Website: www.chipola.edu

Director of Grants: Director of Grants, Office of ACG

This handbook is reviewed and updated periodically. Refer to the ACG Office for the most current version.

Chipola College | Marianna, Florida | www.chipola.edu

APPENDIX A

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

2 CFR § 200.321 — Contracting with Small Businesses, Minority Businesses, Women's Business Enterprises, Veteran-Owned Businesses, and Labor Surplus Area Firms

Referenced in the Purchasing section (Federal and State Contracting Requirements for Small and Minority Businesses) and the Quick Regulatory Reference table.

Source: eCFR, Title 2, Part 200, Subpart D — Procurement Standards

§ 200.321 Contracting with small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms.

(a) When possible, the recipient or subrecipient should ensure that small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms (See U.S. Department of Labor's list) are considered as set forth below.

(b) Such consideration means:

(1) These business types are included on solicitation lists;

(2) These business types are solicited whenever they are deemed eligible as potential sources;

(3) Dividing procurement transactions into separate procurements to permit maximum participation by these business types;

(4) Establishing delivery schedules (for example, the percentage of an order to be delivered by a given date of each month) that encourage participation by these business types;

(5) Utilizing organizations such as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and

(6) Requiring a contractor under a Federal award to apply this section to subcontracts.

Authority: 2 CFR § 200.321, Title 2, Subtitle A, Chapter II, Part 200, Subpart D — Procurement Standards. Source: eCFR (current as of 7/14/2026).

APPENDIX B

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

Florida Statute § 255.102 — Contractor Utilization of Minority Business Enterprises

Referenced in the Purchasing section (Federal and State Contracting Requirements for Small and Minority Businesses) and the Quick Regulatory Reference table.

Source: The Florida Senate, 2025 Florida Statutes, Chapter 255

255.102 Contractor utilization of minority business enterprises.

(1) Agencies shall consider the use of price preferences, weighted preference formulas, or other preferences for construction contracts, as determined appropriate by the Office of Supplier Diversity to increase minority participation.

(2) The Office of Supplier Diversity, in collaboration with the Board of Governors of the State University System, shall adopt rules to determine what is a “good faith effort” for purposes of contractor compliance with minority participation goals established for competitively awarded building and construction projects. Pro forma efforts shall not be considered good faith. Factors which shall be considered by the state agency in determining whether a contractor has made good faith efforts shall include, but not be limited to:

(a) Whether the contractor attended any presolicitation or prebid meetings that were scheduled by the agency to inform minority business enterprises of contracting and subcontracting opportunities.

(b) Whether the contractor advertised in general circulation, trade association, or minority-focus media concerning the subcontracting opportunities.

(c) Whether the contractor provided written notice to all relevant subcontractors listed on the minority vendor list for that locality and statewide as provided by the agency as of the date of issuance of the invitation to bid, that their interest in the contract was being solicited in sufficient time to allow the minority business enterprises to participate effectively.

(d) Whether the contractor followed up initial solicitations of interest by contacting minority business enterprises, the Office of Supplier Diversity, or minority persons who responded and provided detailed information about prebid meetings, access to plans, specifications, contractor's project manager, subcontractor bonding, if any, payment schedule, bid addenda, and other assistance provided by the contractor to enhance minority business enterprise participation.

(e) Whether the contractor selected portions of the work to be performed by minority business enterprises in order to increase the likelihood of meeting the minority business enterprise procurement goals, including, where appropriate, breaking down contracts into economically feasible units to facilitate minority business enterprise participation under reasonable and economical conditions of performance.

(f) Whether the contractor provided the Office of Supplier Diversity as well as interested minority business enterprises or minority persons with adequate information about the plans, specifications, and requirements of the contract or the availability of jobs at a time no later than when such information was provided to other subcontractors.

(g) Whether the contractor negotiated in good faith with interested minority business enterprises or minority persons, not rejecting minority business enterprises or minority persons as unqualified without sound reasons based on a thorough investigation of their capabilities or imposing implausible conditions of performance on the contract.

(h) Whether the contractor diligently seeks to replace a minority business enterprise subcontractor that is unable to perform successfully with another minority business enterprise.

(i) Whether the contractor effectively used the services of available minority community organizations; minority contractors' groups; local, state, and federal minority business assistance offices; and other

organizations that provide assistance in the recruitment and placement of minority business enterprises or minority persons.

(3) If an agency considers any other criteria in determining whether a contractor has made a good faith effort, the agency shall adopt such criteria in accordance with s. 120.54, and, where required by that section, by rule, after May 31, 1994. In adopting such criteria, the agency shall identify the specific factors in as objective a manner as possible to be used to assess a contractor's performance against said criteria.

(4) Notwithstanding the provisions of s. 287.09451 to the contrary, agencies shall monitor good faith efforts of contractors in competitively awarded building and construction projects, in accordance with rules established pursuant to this section. It is the responsibility of the contractor to exercise good faith efforts in accordance with rules established pursuant to this section, and to provide documentation necessary to assess efforts to include minority business participation.

Authority: § 255.102, Fla. Stat. History—ss. 7, 26, ch. 94-322; s. 59, ch. 96-410; s. 10, ch. 98-279; s. 8, ch. 2000-286; s. 42, ch. 2001-61; s. 32, ch. 2007-217.

APPENDIX C

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

2 CFR Part 200, Appendix II — Contract Provisions for Non-Federal Entity Contracts Under Federal Awards

Part of the Davis-Bacon and Federal Labor Standards section and the Section 3 Compliance section. Must be incorporated into grant-funded construction contracts and flowed down to subcontracts, as applicable.

Source: eCFR, Title 2, Appendix II to Part 200

Appendix II to Part 200 — Contract Provisions for Non-Federal Entity Contracts Under Federal Awards

In addition to other provisions required by the Federal agency or non-Federal entity, all contracts made by the non-Federal entity under the Federal award must contain provisions covering the following, as applicable.

(A) Contracts for more than the simplified acquisition threshold, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

(B) All contracts in excess of $10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement.

(C) Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of “federally assisted construction contract” in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, “Equal Employment Opportunity” (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, “Amending Executive Order 11246 Relating to Equal Employment Opportunity,” and implementing regulations at 41 CFR part 60, “Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor.”

(D) Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by Federal program legislation, all prime construction contracts in excess of $2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, “Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction”). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency. The contracts must also include a provision for compliance with the Copeland “Anti-Kickback” Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, “Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States”). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.

(E) Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-Federal entity in excess of $100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by

Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

(F) Rights to Inventions Made Under a Contract or Agreement. If the Federal award meets the definition of "funding agreement" under 37 CFR § 401.2(a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that "funding agreement," the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements," and any implementing regulations issued by the awarding agency.

(G) Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended — Contracts and subgrants of amounts in excess of $150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

(H) Debarment and Suspension (Executive Orders 12549 and 12689) — A contract award (see 2 CFR 180.220) must not be made to parties listed on the governmentwide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

(I) Byrd Anti-Lobbying Amendment (31 U.S.C. 1352) — Contractors that apply or bid for an award exceeding $100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.

(J) See § 200.323.

(K) See § 200.216.

(L) See § 200.322.

Authority: 2 CFR Appendix II to Part 200, Title 2 (up to date as of 7/23/2024). [78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75888, Dec. 19, 2014; 85 FR 49577, Aug. 13, 2020]

APPENDIX D

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

C-536 — CDBG Supplemental Conditions for Construction Contracts (Summary Checklist)

Part of the Davis-Bacon and Federal Labor Standards section and the Section 3 Compliance section. The 12 sections below are condensed to a one-page checklist of key obligations; the complete Form SC-66 (21 pages) is maintained by and available from the ACG Office for incorporation into contract documents.

Source: Florida Department of Economic Opportunity / FloridaCommerce, Form SC-66 (April 2015)

C-536 Checklist — CDBG Supplemental Conditions for Construction Contracts

Every grant-funded construction contract must incorporate Form SC-66 in full. Use this checklist to confirm all twelve supplemental condition sections are addressed in the contract documents:

☐ Termination (Cause and Convenience) — contract may be terminated for cause with 10 days' written notice and a consultation opportunity, or for convenience by the local government, with an equitable adjustment to the contractor in either case.

☐ Access to Records — the local government, FloridaCommerce, HUD, the CFO, the Auditor General, OPPAGA, and their representatives must have access to all contractor books and records pertinent to the contract.

☐ Retention of Records — contractor must retain all contract records for six years after final payment and closeout of all pending matters.

☐ Remedies — disputes are resolved by arbitration (if mutually agreed) or in a Florida court of competent jurisdiction.

☐ Environmental Compliance — contracts over $100,000 must comply with the Clean Air Act, Clean Water Act, Executive Order 11738, and 40 CFR Part 15; the clause flows down to subcontracts over $100,000.

☐ Energy Efficiency — contractor must comply with the state energy conservation plan issued under the Energy Policy and Conservation Act.

☐ Special Equal Opportunity Provisions — nondiscrimination and affirmative action clauses (Executive Order 11246, EEO clause, and applicable construction contract specifications) apply, with goal-tracking and reporting obligations that scale with contract value.

☐ Conflict of Interest — no officer, employee, or agent of the local jurisdiction or its governing body may have a financial interest in the contract.

☐ Utilization of Minority and Women's Businesses (M/WBE) — contractor must take affirmative steps to solicit and document use of certified M/WBE suppliers and subcontractors.

☐ Federal Labor Standards Provisions — Davis-Bacon prevailing wage, Copeland Anti-Kickback, and Contract Work Hours & Safety Standards Act requirements apply, including weekly certified payrolls and job-site wage determination/poster postings.

☐ Guidance to Contractor for Compliance with Labor Standards — worker classification, apprentice/helper documentation, and payroll recordkeeping must follow DOL guidance to support Davis-Bacon compliance.

☐ E-Verify — contractors and subcontractors must enroll in and use E-Verify to confirm employment eligibility of all new hires under the contract, per Governor's Executive Order 11-116.

⚑ **REMINDER:** This checklist is a summary aid only and does not replace Form SC-66. Project directors and Physical Plant must attach the complete, current C-536 document to every CDBG-funded construction contract; contact the ACG Office for the full text.

APPENDIX E

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

C-537 — Section 3 Contract Clause

Part of the Section 3 Compliance section. Must be included in every Section 3-covered contract and subcontract per 24 CFR Part 75. Full source text follows on the next page.

Source: Chipola College / FloridaCommerce CDBG-DR contract clause C-537

APPENDIX F

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

Employee Rights Under the Fair Labor Standards Act — Federal Minimum Wage Poster

Part of the Davis-Bacon and Federal Labor Standards section. Must be posted at the job site where employees can readily see it.

Source: U.S. Department of Labor, Wage and Hour Division (WH1088, Rev. 04/23)

Employee Rights Under the Fair Labor Standards Act

The law requires employers to display this poster where employees can readily see it.

FEDERAL MINIMUM WAGE — $7.25 PER HOUR

Beginning July 24, 2009

Overtime Pay: At least 1½ times the regular rate of pay for all hours worked over 40 in a workweek.

Child Labor: An employee must be at least 16 years old to work in most non-farm jobs and at least 18 to work in non-farm jobs declared hazardous by the Secretary of Labor. Youths 14 and 15 years old may work outside school hours in various non-manufacturing, non-mining, non-hazardous jobs with certain work hours restrictions. Different rules apply in agricultural employment.

Tip Credit: Employers of "tipped employees" who meet certain conditions may claim a partial wage credit based on tips received by their employees. Employers must pay tipped employees a cash wage of at least $2.13 per hour if they claim a tip credit against their minimum wage obligation. If an employee's tips combined with the employer's cash wage of at least $2.13 per hour do not equal the minimum hourly wage, the employer must make up the difference.

Nursing Employee Break Time: The FLSA requires employers to provide reasonable break time for a nursing employee to express breast milk for their nursing child for one year after the child's birth each time the employee needs to express breast milk. Employers must provide a place, other than a bathroom, that is shielded from view and free from intrusion from coworkers and the public, which may be used by the employee to express breast milk.

Enforcement: The Department has authority to recover back wages and an equal amount in liquidated damages in instances of minimum wage, overtime, and other violations. The Department may litigate and/or recommend criminal prosecution. Employers may be assessed civil money penalties for each willful or repeated violation of the minimum wage or overtime pay provisions of the law. Civil money penalties may also be assessed for violations of the FLSA's child labor provisions. Heightened civil money penalties may be assessed for each child labor violation that results in the death or serious injury of any minor employee, and such assessments may be doubled when the violations are determined to be willful or repeated. The law also prohibits retaliating against or discharging workers who file a complaint or participate in any proceeding under the FLSA.

Additional Information

- Certain occupations and establishments are exempt from the minimum wage, and/or overtime pay provisions. Certain narrow exemptions also apply to the nursing employee break time requirements.
- Special provisions apply to workers in American Samoa, the Commonwealth of the Northern Mariana Islands, and the Commonwealth of Puerto Rico.
- Some state laws provide greater employee protections; employers must comply with both.
- Some employers incorrectly classify workers as "independent contractors" when they are actually employees under the FLSA. It is important to know the difference between the two because employees

(unless exempt) are entitled to the FLSA's minimum wage and overtime pay protections and correctly classified independent contractors are not.

- Certain full-time students, student learners, apprentices, and workers with disabilities may be paid less than the minimum wage under special certificates issued by the Department of Labor.

Authority: U.S. Department of Labor, Wage and Hour Division. 1-866-487-9243 | www.dol.gov/agencies/whd. WH1088, Rev. 04/23.

APPENDIX G

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

Davis-Bacon Act Poster (WH-1321)

Part of the Davis-Bacon and Federal Labor Standards section. Must be posted at the job site with the applicable wage determination.

Source: U.S. Department of Labor, Wage and Hour Division (WH-1321, Rev. 10/17)

Employee Rights Under the Davis-Bacon Act

For laborers and mechanics employed on federal or federally assisted construction projects.

Prevailing Wages: You must be paid not less than the wage rate listed in the Davis-Bacon Wage Decision posted with this Notice for the work you perform.

Overtime: You must be paid not less than one and one-half times your basic rate of pay for all hours worked over 40 in a work week. There are few exceptions.

Enforcement: Contract payments can be withheld to ensure workers receive wages and overtime pay due, and liquidated damages may apply if overtime pay requirements are not met. Davis-Bacon contract clauses allow contract termination and debarment of contractors from future federal contracts for up to three years. A contractor who falsifies certified payroll records or induces wage kickbacks may be subject to civil or criminal prosecution, fines and/or imprisonment.

Apprentices: Apprentice rates apply only to apprentices properly registered under approved Federal or State apprenticeship programs.

Proper Pay: If you do not receive proper pay, or require further information on the applicable wages, contact the Contracting Officer listed in the contract documents, or the U.S. Department of Labor's Wage and Hour Division.

Authority: U.S. Department of Labor, Wage and Hour Division. 1-866-487-9243 | TTY: 1-877-889-5627 | www.dol.gov/whd. WH-1321, Rev. 10/17.

APPENDIX H

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

Vendor Suspension & Debarment Screening Checklist

Referenced in the Purchasing section (Suspension and Debarment Screening) and the Quick Regulatory Reference table. Consolidated from the Chipola College Suspension and Debarment Policy and Checklist.

Source: Chipola College Suspension and Debarment Policy and Checklist, Appendix A (effective July 15, 2026)

Vendor Suspension & Debarment Screening Checklist

Complete this checklist before any covered purchase (expected to equal or exceed $25,000 in federal funds, or any purchase using state funds or a state term contract). Attach to the purchase order, check request, or Capital Purchase Authorization form and file in the program's grant purchasing file.

Department/Program: _____ Vendor Name: _____

Purchase Description: _____ PO/Requisition #: _____

Estimated Amount: $_____ Funding Source (Federal/State — Grant/Contract #): _____

☐ Searched vendor name (and principals, if known) at www.sam.gov under Entity Information.

☐ If multiple/similar results appeared, verified the correct entity by checking the address.

☐ Confirmed status: no active exclusion found (“Entity”) — OR — exclusion found (“Exclusion”).

☐ Saved or printed the SAM.gov results screen showing the search term and status.

☐ If using state funds or a state term contract, confirmed the vendor is not on the Florida Suspended Vendor List (§ 287.1351, Fla. Stat.).

☐ If using state funds, confirmed vendor registration in MyFloridaMarketPlace (Search Vendors).

☐ If excluded or suspended: notified the Program Director and the AVP of Assessment, Compliance, and Grants; identified an alternate vendor.

☐ Attached documentation to the purchase order, check request, or Capital Purchase Authorization form.

☐ Filed documentation in the program's grant purchasing file.

Result: ☐ CLEAR — no exclusion or Florida Suspended Vendor List match found; vendor approved. ☐ EXCLUDED/SUSPENDED — purchase may NOT proceed; escalated to AVP of ACG on: _____

Screened By (Name/Title): _____ Date: _____

Reviewed By (Grants Coordinator): _____ Date: _____

⚑ **REMINDER:** Retain this checklist, together with the SAM.gov results printout, in the program's federal grant purchasing file for a minimum of six years after grant closeout, or longer if required by the specific award terms.

APPENDIX I

● NEW APPENDIX — ADDED IN THIS REVISION (AUGUST 2026)

Section 3 Tracking Log

Referenced in the Section 3 Compliance section and the Quick Regulatory Reference table.

Newly developed for the Chipola Grants Handbook, August 2026, in response to Action Item 5 of the FloridaCommerce CDBG-DR Technical Assistance Plan (TAP)

Section 3 Tracking Log

Initiate this log at contract award for each covered HUD-funded construction project and update it throughout outreach, hiring, and reporting, consistent with the Section 3 Compliance section. File the completed log in the project's grant file at closeout.

Project Name/Contract #: _____ Contractor: _____

Award/Grant #: _____ Reporting Period: _____ to _____

☐ Contractor certified that no vacant positions were filled between contractor selection and contract execution to circumvent Section 3 obligations (C-537, Clause V). Date confirmed: _____

Section 3 Outreach (attach additional pages if needed)

Date: _____ Organization/Contact: _____ Method: _____

Date: _____ Organization/Contact: _____ Method: _____

Date: _____ Organization/Contact: _____ Method: _____

Section 3 Hiring (attach additional pages if needed)

Name: _____ Trade/Position: _____ Hire Date: _____

Section 3 Worker: ☐ Yes ☐ No Targeted Section 3 Worker: ☐ Yes ☐ No Hours This Period: _____

Eligibility Certification Date: _____

Name: _____ Trade/Position: _____ Hire Date: _____

Section 3 Worker: ☐ Yes ☐ No Targeted Section 3 Worker: ☐ Yes ☐ No Hours This Period: _____

Eligibility Certification Date: _____

Total Labor Hours, All Workers on the Project This Period: _____

Best Efforts (if Section 3 benchmarks for the award are not met):

_____

_____

Reporting: ☐ Included in progress report submitted to FloridaCommerce on: _____ ☐ Included in HUD Section 3 reporting system on: _____ (if applicable)

Prepared By (ACG): _____ Date: _____

Reviewed By (Associate VP of ACG): _____ Date: _____

⚑ **REMINDER:** Retain this log, together with supporting outreach records and certified payroll documentation, in the project's grant file for a minimum of six years after grant closeout, or longer if required by the specific award terms.