

Sebastian Inlet District
Draft Administrative Policy Manual Workshop
Wednesday, 4 PM, April 22, 2026
Sebastian Inlet District Office
114 Sixth Avenue
Indialantic, FL, 32903

AGENDA

- I. Call to Order — Chairman Barney**
- II. Discussion of the Draft Sebastian Inlet District Administrative Policy Manual**
- III. Public Comment**
- IV. Adjournment**

SEBASTIAN INLET DISTRICT

DRAFT ADMINISTRATIVE POLICY MANUAL WORKSHOP

4:00 PM - APRIL 22, 2026

BACKGROUND

Administrative Policy Manuals are common and transparent instruments for local governments, including independent special districts, to formally adopt an internal governance structure and minimize risk. The Sebastian Inlet District currently does not have an adopted Administrative Policy Manual.

DESCRIPTION AND CONDITIONS

The proposed DRAFT Sebastian Inlet District Administrative Policy Manual (DRAFT Manual) is presented for review and discussion. The DRAFT Manual contains eleven (11) separate chapters and an appendix of previously adopted Board policies.

Comments and supporting documents from Commissioners are also provided for review and discussion.

PURPOSE

Discuss the DRAFT Manual and supporting materials in a workshop format.

ATTACHMENTS

1. DRAFT Administrative Policy Manual **(PP 2-23)**
2. Commissioner comments and supporting documents **(PP 24-76)**
 - a. Commissioner Barney **(P 25)**
 - b. Commissioner Campbell **(PP 26-27)**
 - c. Commissioner Marshall **(PP 28-60)**
 - d. Commissioner Frazier **(PP 61-76)**

ATTACHMENT 1

DRAFT ADMINISTRATIVE POLICY MANUAL

SEBASTIAN INLET DISTRICT
ADMINISTRATIVE POLICY MANUAL

Adopted: _____, 2026

Resolution No.: _____



TABLE OF CONTENTS

- Chapter 1. [Enabling Legislation & Governance Structure](#)
- Chapter 2. [Uniform Special District Accountability Act Compliance](#)
- Chapter 3. [Administrative Authority & Board Procedures](#)
- Chapter 4. [Fiscal Procedures & Financial Controls](#)
- Chapter 5. [Procurement & Contracting](#)
- Chapter 6. [Personnel Policies](#)
- Chapter 7. [Public Records & Records Management](#)
- Chapter 8. [Ethics, Sunshine & Governance Compliance](#)
- Chapter 9. [Internal Controls & Audit Standards](#)
- Chapter 10. [Emergency Authority](#)
- Chapter 11. [Amendments](#)

APPENDIX

- Appendix A – Cash Management Policy – 4-13-22
- Appendix B – Executive Director Spending Authority – Resolution No. 07.10.19-2
- Appendix C – Travel Policy – Resolution No. 2005-1
- Appendix D – District Public Records Request and Fee Schedule Procedures 3-13-24

CHAPTER 1

ENABLING LEGISLATION & GOVERNANCE STRUCTURE

1.1 Establishment

Created as an independent special taxing district by the Florida State Legislature through the passage of Chapter 7976, Laws of Florida, Special Acts of 1919 (“Enabling Legislation”), the Sebastian Inlet District was chartered to maintain the navigational channel between the Atlantic Ocean and the Indian River Lagoon.

1.2 Purpose and Authority

It shall be the duty of the Board of Commissioners of Sebastian Inlet District (District) to construct, improve, widen or deepen, and maintain an inlet between Indian River and the Atlantic Ocean. The powers exercisable by the District, in addition to its charge to maintain the Sebastian Inlet, include environmental preservation and enhancement, ad valorem taxation, eminent domain, interlocal cooperation, acquisition of property, and the power to issue bonds. The District is authorized to conduct such programs and projects as it finds necessary or convenient for sediment bypassing (beach renourishment), erosion control, environmental protection, navigation, boating, recreation and public safety for the operation and maintenance of the inlet and the waters of the Atlantic Ocean and Indian River Lagoon adjacent thereto.

1.3 Governing Body

The District is governed by a five-member Board of Commissioners as provided in its Enabling Legislation with three (3) Brevard County seats and two (2) Indian River County seats. Property owners within the District's boundaries in Brevard and Indian River Counties can cast their vote for all eligible Sebastian Inlet District Commission seats during the general election held in November of each even-numbered year. The terms of the Board members shall be staggered, with three (3) Board members standing for election in one general election for a 4-year term, and two (2) Board members standing for election 2 years later at the general election for a 4-year term. Unless specified by Florida Statutes, approval of District policy, budget, contracts, etc., require a minimum of 3 Yay votes. Three members of the Board shall constitute quorum, with two affirmative votes required for business when only 3 members present. Commissioners act collectively as the governing body. Individual commissioners possess no independent administrative authority unless expressly authorized by Board action.

1.4 Officers

The Board shall elect a Chair, Vice-Chair, and Secretary/Treasurer (may be combined). Officers serve two-year terms or until successors are elected.

The officers of this Commission shall be a Chair, Vice-Chair, Secretary/ Treasurer. The position of Secretary and Treasurer may be combined and held by one Commissioner.

As the presiding officer of the Board, the Chair shall:

- At every meeting call the Board to order, call the roll on the appearance of a quorum, and proceed to the business of the Board
- Sign all ordinances enacted and resolutions adopted by the Board
- Authorize the placing of items on the Regular Agenda and the removal of items from the Consent Agenda
- Exercise the powers granted by these Rules and Policies to the Chair or to the presiding officer
- Present, or designate another Commissioner to present, all awards, resolutions and honors presented on behalf of the Board
- Perform such other duties as the Board may direct

The duties of the Vice-Chair shall include performance of all duties of the Chair, in the temporary absence, disability or conflict of the Chair.

The duties of the Secretary/Treasurer shall include the following:

- Recording the minutes of all meetings unless done by staff
- Providing notices for all meetings unless done by staff
- Custodial care of all funds and investments of the District
- Maintenance of financial records and a report thereon at each quarter unless provided by staff
- Such other financial duties as may be directed by the Commission

CHAPTER 2

UNIFORM SPECIAL DISTRICT ACCOUNTABILITY ACT COMPLIANCE

The District shall comply with Chapter 189.03, Florida Statutes.

CHAPTER 3

ADMINISTRATIVE AUTHORITY & BOARD PROCEDURES

3.1 Role of the Board

The Board:

- Governs, establishes policy, and adopts resolutions
- Annually adopts budget and millage rate
- Approves contracts
- Evaluates the Executive Director

3.2 Role of the Executive Director

The Executive Director:

- Serves as chief administrative officer and shall be responsible for the general and day-to-day administration of the District, subject to the direction and authority of the Board
- Implements Board policy
- Develops, recommends, implements, administers, reviews and monitors the District's budget as approved by the Board
- Supervises all District staff and consultants
- Oversees operations, procurement, programs and projects, grants, and compliance
- Prepares agendas and meeting materials
- Serves as spokesperson for the District, attends public meetings, and works with the public to identify the needs and interests of the surrounding communities and to promote the District's interests and objectives
- Performs such other duties as may be required by the Board

All District operational direction flows through the Executive Director.

3.3 Board Meetings

- All meeting shall be open to the public
- Regular meetings: The Board meets on the 2nd Wednesday of each month. Meeting location and time alternate between Indian River and Brevard counties to better serve

constituents residing within the District's boundaries in both counties. Public meetings are noticed in the local newspapers one week prior to the meeting and on the District website. Meeting agendas and packages are located on the District website (www.sitd.us)

- Workshops: As needed. Notice will be provided in the same manner as for regular meetings.
- Special meetings: As needed. Two days written notice of the time and purpose of a special meeting shall be given to all members, the news media, and will be posted (on website).
- Emergency meetings: Where there is an immediate danger to public health, safety, or welfare that requires immediate action, the Board may hold an emergency meeting. The Board must give notice by a procedure that is reasonable under the circumstances and necessary to protect the public interest.

3.4 Board Meeting Minutes

- **Statutory Authority**
 - Pursuant to **Section 286.011(2), Florida Statutes**, minutes of all meetings of the Board shall be promptly recorded and maintained as public records.
- **Nature of Minutes**
 - Board minutes are intended to serve as an official summary record of actions taken by the Board. The purpose of Board minutes is to document official action of the Board as a body.
 - Minutes shall:
 - Identify the date, time, and location of the meeting
 - Identify Board members present and absent
 - Record motions, seconds, and vote outcomes
 - Reflect official actions taken
 - Provide a concise summary of discussion sufficient to reflect the substance of matters considered
- **Attribution of Individual Comments**
 - Florida law does not require detailed attribution of individual comments made during Board discussion
 - The District shall prepare summary-style minutes unless the Board formally directs otherwise by majority vote

- Individual Board members may request that their vote be recorded, which shall be reflected in the minutes as required by law
 - **Recording of Meetings**
 - Audio or video recordings, when made, are public records but do not replace the statutory requirement for written minutes
-

CHAPTER 4

FISCAL PROCEDURES & FINANCIAL CONTROLS

4.1 Budget Process

The Executive Director shall prepare a proposed annual budget and coordinate all TRIM requirements. Budget adoption shall occur through properly noticed public hearings.

4.2 Accounting System

The District shall maintain a standardized Chart of Accounts and utilize approved governmental accounting software. The District currently uses QuickBooks Desktop.

4.3 Payment Authorization

The payables are paid semi-monthly by the Contracts/Accounting Manager. All ACH payments and check payments are reviewed and approved by the Executive Director and one of the authorized Commissioners. Checks are signed by the Executive Director and one of the authorized Commissioners. Authorized check signers for the District include the Executive Director, the Commission Chair and the Commission Secretary/Treasurer.

4.4 Banking and Investments

The District has a checking account and a money market account with PNC Bank. The checking account carries a balance of \$25K and the excess is “swept” into a money market account which accrues interest.

District surplus funds shall be invested in accordance with Florida Statutes and the District’s adopted Cash Management Policy. The District currently utilizes Florida PRIME through the State Board of Administration (SBA). The opening of the Florida PRIME account was approved by the Board in October 2021.

Florida PRIME is a government investment pool that offers management by Federated Hermes. The Pool offers investors experienced, government-level liquidity management, conservative investment policies, an extensive governance framework, a Standard & Poor’s “AAAm” rating, full transparency, and best-in-class financial reporting. It serves over 850

users in Florida and is made up of approximately \$24.6 billion in public funds. The website is: <https://prime.sbafla.com>.

On April 01, 2022, the Commission authorized staff to conduct a monthly transfer of funds in excess of \$5 million dollars in the PNC Bank account to the Florida PRIME account. (Appendix A – Cash Management Policy).

4.5 Internal Controls

The District shall maintain:

- Monthly bank reconciliations
 - Segregation of duties where feasible
 - Annual independent/single audits
 - Tiered approval for accounts payable (Executive Director and authorized Commissioner review and approval)
-

CHAPTER 5

PROCUREMENT & CONTRACTING

The District shall comply with all applicable procurement laws under Chapter 287, Florida Statutes, including competitive bidding requirements, statutory thresholds and internal procurement processes.

The Executive Director may execute contracts up to a Board-approved spending threshold (\$10,000) without prior Board approval, subject to ratification at the next Board meeting. (Appendix B – Executive Director Spending Authority - Resolution No. 07.10.19-2).

In the event of an emergency and consistent with the District Charter, the Board is authorized to spend a sum not to exceed \$15,000.

CHAPTER 6

PERSONNEL POLICIES

6.1 Employment Status

All employees are at-will unless otherwise specified by written contract.

6.2 Standards of Conduct

Employees shall maintain professional conduct and comply with all applicable ethics and workplace policies.

Harassment, discrimination, retaliation, and disruptive conduct are prohibited.

6.3 Travel & Reimbursement Policy

The District shall comply with the Travel Policy adopted by the Board on March 9, 2005. (Appendix C – District Travel Policy – Resolution No.2005-1).

The Travel Policy establishes procedures for authorization and reimbursement of travel expenses incurred by District employees and officials in the performance of official District business.

A. Transportation

- Travel shall be by the most efficient and economical means available
- Air travel shall be booked as far in advance as practical to obtain the lowest reasonable fare
- Use of a personal vehicle shall be reimbursed at the IRS standard mileage rate in effect at the time of travel. Tolls and parking fees will be reimbursed when documented

B. Lodging

- Lodging should be reserved in advance at the lowest reasonable rate.
- Florida sales tax exemption shall be requested when applicable.
- Travelers shall verify lodging charges at check-in and check-out.

C. Meal Expenses

- Meal reimbursements shall follow federal per diem rates (GSA M&IE)
- Alcoholic beverages and tobacco products are not reimbursable under any circumstances.

D. Per Diem Advances

Advance per diem payments are not permitted unless specifically authorized by Board policy.

E. Documentation & Reimbursement

- All travel reimbursement requests must be submitted within ten (10) business days of return.
 - Reimbursement requests must include itemized receipts and proof of payment.
 - Reimbursements are subject to review by the Executive Director and approval by the Board when required.
-

CHAPTER 7

PUBLIC RECORDS & RECORDS MANAGEMENT

7.1 Compliance with Chapter 119, Florida Statutes

The District complies with Chapter 119, Florida Statutes, and applicable public records retention schedules issued by the Florida Division of Library and Information Services.

The Executive Director, or his or her designee, shall serve as the Custodian of public records charged with the responsibility of maintaining public records.

Public records means all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.

7.2 District Public Records Request and Fee Schedule Procedures

In addition to Florida Statutes, all public records requests received orally and/or in writing shall follow the District Public Records Request and Fee Schedule Procedures adopted by the Board on March 13, 2024. (Appendix D).

The Executive Director must be informed of all public records requests received by telephone, email, letter, fax, or in person.

CHAPTER 8

ETHICS, SUNSHINE & GOVERNANCE COMPLIANCE

8.1 Commissioner Conduct & Professional Civility

A. Purpose

The Board of Commissioners affirms that effective governance requires professionalism, mutual respect, and adherence to ethical standards. This section establishes expectations for commissioner conduct to promote orderly meetings, protect staff from inappropriate interference, preserve public confidence in District leadership, and minimize District risk.

B. Standards of Professional Conduct

Commissioners shall:

- Treat fellow commissioners, staff, consultants, and members of the public with dignity and respect
- Refrain from personal attacks, disruptive behavior, or conduct that undermines orderly proceedings
- Avoid conduct that could reasonably be perceived as harassment, intimidation, or retaliation
- Respect the distinction between the branches of government: Legislative (Board role), Legal (Attorney role) and Executive (Executive Director role)

C. Operation within Administrative Structure

Individual commissioners shall not:

- Direct or supervise staff outside Board action
- Demand operational changes outside Board action
- Conduct independent investigations without Board authorization
- Interfere with vendor, consultant, or stakeholder relationships outside Board action

All operational inquiries shall be directed to the Executive Director.

D. Meeting Decorum

The Chair is authorized to maintain decorum during meetings. Deliberations of the Board of Commissioners shall be conducted pursuant to Robert's Rules of Order. The Chair shall exercise care that the right of each Commissioner to be heard is respected, and that the

actions of the Board are clear. In controversial deliberations, strict adherence to Robert's Rules of Order may be invoked by the Chair, or any Commissioner by raising a point of order. The latest published edition of "Robert's Rules of Order" shall be the parliamentary authority for all matters of procedure.

E. Corrective Measures

If conduct concerns arise, the Board may address the matter through:

- Board discussion in open session
- Formal reminder of policy
- Referral to ethics training
- Other lawful corrective measures

This section is intended to reinforce professionalism and does not limit statutory remedies available under Florida law.

8.2 Board Member Communications Outside Public Meetings

A. Purpose

In recognition of the fact that the Board has no way of knowing what matters may or may not come before it for action and that matters relating to the Board and its powers, duties and areas of interest may come before the Board for action, the Board adopts a communication rule to prevent inadvertent violations of the Sunshine Law, limit potential liability of the District and commissioners, and ensure strict compliance with open government requirements.

B. Prohibited Communications

Pursuant to Florida's Sunshine Law, commissioners shall not email, text, message, call, or otherwise communicate with one another regarding any District business outside a duly noticed public meeting.

This prohibition applies regardless of whether the matter is:

- On a current agenda
- Anticipated for a future agenda
- Described as informational only
- Characterized by the communicating commissioner as not foreseeable for Board action

All discussion of District business shall occur only during properly noticed public meetings.

C. Serial Communications Prohibited

Commissioners shall not engage in serial or "daisy chain" communications for the purpose of discussing District matters outside a public meeting.

D. Staff as Intermediaries Prohibited

Commissioners shall not use staff or consultants to convey positions, opinions, or preferences to other Commissioners outside public meetings.

E. Permitted Communications

Permitted communications include:

1. Administrative scheduling coordination not involving District business discussion
2. One-way informational distribution from the Executive Director
3. Communications during duly noticed public meetings
4. Communications unrelated to District business

District Business means any matter involving officials acts, transactions, or discussions that fall within the Board's governmental authority and decision-making responsibilities, including but not limited to operational matters, budget discussions, and policy development.

F. Social Media

Commissioners shall not engage in interactive discussions with one another concerning District business on social media or digital platforms outside public meetings.

G. Inadvertent Communications

If a Commissioner receives a District-related communication from another Commissioner outside a public meeting, the recipient shall refrain from responding and notify the Executive Director for retention of public records and may request legal counsel to provide an opinion.

CHAPTER 9

INTERNAL CONTROLS & AUDIT STANDARDS

9.1 Purpose

The District shall maintain a system of internal controls designed to safeguard public funds, ensure reliability of financial reporting, promote operational efficiency, and ensure compliance with applicable laws and regulations.

9.2 Control Environment

The Board and Executive Director shall establish a tone at the top emphasizing integrity, transparency, and accountability.

9.3 Segregation of Duties

To the extent practical given staffing levels, financial responsibilities shall be segregated to prevent any single individual from controlling authorization, custody, and recordkeeping functions.

9.4 Authorization & Approval Controls

- All contract authorizations require Board approval unless specifically delegated
- Contracts must be executed in accordance with adopted procurement policies
- All ACH payments and check payments are reviewed and approved by the Executive Director and one of the authorized Commissioners
- Opening or modifying District financial accounts and wire transfer authorizations shall be formally authorized by Board action

9.5 Reconciliations

- Monthly bank reconciliations shall be performed and reviewed.
- Investment statements shall be reconciled monthly.
- Variances between budget and actual expenditures shall be reported to the Board quarterly.

9.6 Physical & Digital Safeguards

The District shall maintain safeguards over:

- Check stock and financial instruments

- Online banking credentials
- Electronic accounting systems
- Sensitive personnel and legal records

9.7 Independent Audit

The District shall engage an independent certified public accountant annually in accordance with Chapter 218, Florida Statutes. Single Audits will be conducted when required. Annual audits shall be presented at a public meeting.

9.8 Fraud Reporting

Any suspected fraud, misuse of public funds, or financial irregularity shall be reported immediately to the Board Chair, Executive Director, and/or legal counsel.

CHAPTER 10

EMERGENCY AUTHORITY

In emergency circumstances threatening life, safety, or District property, the Executive Director may take necessary action consistent with Florida law. All emergency actions shall be reported to and ratified by the Board at the next public meeting.

CHAPTER 11

AMENDMENTS

This Administrative Policy Manual may be amended by resolution of the Board of Commissioners at a duly noticed public meeting.

BOARD ADOPTION RESOLUTION

RESOLUTION NO. _____

A RESOLUTION OF THE SEBASTIAN INLET DISTRICT ADOPTING AN ADMINISTRATIVE POLICY MANUAL; PROVIDING FOR IMPLEMENTATION; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Sebastian Inlet District is an independent special district of the State of Florida; and

WHEREAS, the Board of Commissioners finds it necessary and appropriate to adopt a comprehensive Administrative Policy Manual to provide structure, transparency, and compliance with applicable Florida law; and

WHEREAS, the Board desires to establish clear governance procedures, financial controls, personnel standards, procurement practices, public records compliance, and Sunshine Law safeguards;

THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE SEBASTIAN INLET TAX DISTRICT, AS THE GOVERNING BOARD OF THE SEBASTIAN INLET TAX DISTRICT:

Section 1. The Administrative Policy Manual attached hereto is hereby adopted.

Section 2. The Executive Director is authorized to implement and administer the Manual.

Section 3. This Resolution shall take effect immediately upon adoption.

DONE, ORDERED AND ADOPTED this ___ day of _____, 2026.

David Barney, Chairman

APPROVED AS TO FORM AND LEGAL SUFFICIENCY

Shawn L. Demers, Esq.

APPENDIX A - Cash Management Policy

CONSENT

SEBASTIAN INLET DISTRICT BOARD MEMORANDUM

TO: Members of the Board
of Sebastian Inlet District Commission

THROUGH: James D. Gray, Jr. *(JDG)*
Executive Director

FROM: Dave Kershaw *(DK)*
Sr. Contracts/Accounting Manager

SUBJECT: Cash Management Policy

DATE: April 1, 2022

DESCRIPTION AND CONDITIONS

As District revenue is received from grants, contracts and other sources, that revenue is deposited into its Checking/Savings account with PNC Bank. Recently, the District has sought to maintain a cash balance in its Checking/Savings account at PNC of approximately \$5 million. This amount allows the District to maintain a prudent level of funds to meet its annual general government expenditures, required monitoring expenditures and to have the liquidity to meet a potential disaster situation. The total of the PNC account as of March 31, 2022 was \$7,691,733.92.

FUNDING

District internal funds

RECOMMENDATION

Authorize staff to: 1) transfer \$2,691,733.92 from PNC to the District's account with Florida PRIME; and 2) begin a monthly transfer of funds in excess of \$5 million in the PNC account into the Florida PRIME account approved by the Commission on September 28, 2021. The current 30-Day SEC Yield on 03/31/22 was .28.

ATTACHMENT

None

APPROVED AGENDA ITEM FOR: APRIL 13, 2022

APPENDIX B - Executive Director Spending Authority

RESOLUTION NO. 07.10.19-2

A RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE SEBASTIAN INLET DISTRICT, AUTHORIZING SPENDING AUTHORITY TO DISTRICT EXECUTIVE DIRECTOR

WHEREAS, the duty of the Sebastian Inlet District is to construct, improve, widen or deepen, and maintain the inlet between the Indian River and Atlantic Ocean; and

WHEREAS, Sebastian Inlet District is authorized to conduct such programs and projects as it finds necessary or convenient for beach renourishment, erosion control, environmental protection, navigation, boating, recreation, and public safety for the operation and maintenance of the inlet and the waters of the Atlantic Ocean and Indian River Lagoon adjacent thereto; and

WHEREAS, Sebastian Inlet District has hired an Executive Director to recommend programs and projects to fulfill its Charter; and

WHEREAS, on occasion programs and projects require immediate attention and approval.

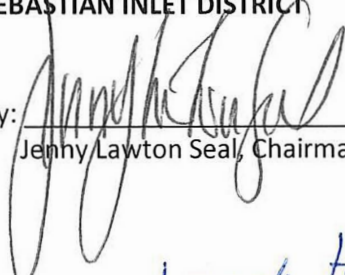
BE IT HEREBY RESOLVED that the Board of Commissioners of the Sebastian Inlet District approves, except as otherwise provided by Florida Statutes, the Executive Director or his designee, the authority to purchase or contract for supplies, materials, equipment, and services costing ten thousand dollars (\$10,000) or less. Any such purchase or contract may be executed by the Executive Director in the name of the Sebastian Inlet District without Commission action, although copies of any such contracts shall be available to the Commission for inspection. *

THE FOREGOING RESOLUTION Upon motion by Commissioner Frazier and second by Commissioner Mitchell, the Board approved the Resolution as follows:

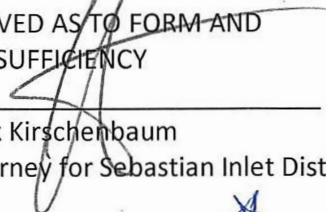
Lisa Frazier
Chris Hendricks
Beth Mitchell
Jenny Lawton Seal
Michael Rowland

The Chair thereupon declared the resolution duly passed and adopted this 10th day of July, 2019.

SEBASTIAN INLET DISTRICT

By: 
Jenny Lawton Seal, Chairman

APPROVED AS TO FORM AND
LEGAL SUFFICIENCY

By: 
Jack Kirschenbaum
Attorney for Sebastian Inlet District

* and shall be brought to me the attention of the Board at the next Board meeting.

APPENDIX C - Travel Policy

RESOLUTION NO. 2005-1

A RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE SEBASTIAN INLET TAX DISTRICT, ESTABLISHING THE MAXIMUM TRAVEL REIMBURSEMENT RATES FOR MEALS AND MILEAGE

WHEREAS, the Sebastian Inlet Tax District (the "District") is a special independent taxing district of the state of Florida established and operating under Chapter 2003-373, Florida Statutes; and

WHEREAS, the District is subject to the travel and per diem rates established by s. 112.061, FS.; and

WHEREAS, the Florida Legislature has passed SB 1426 that became law as Chapter 2003-125, Florida Statutes, which allows special districts to establish travel and per diem rates that exceed those specified in s. 112.061, FS. by passage of a resolution.

NOW, THEREFORE, be it resolved by the Board of Commissioners of the Sebastian Inlet Tax District:

Section 1. The Board hereby establishes the mileage rate for travel in an individual's personal vehicle to be the standard mileage rate established by the Internal Revenue Service for the calendar year of the travel incurred.

Section 2. The Board hereby establishes the per diem meal rate to be the lesser of; (1) the actual meal expense made by the individual for their meals during the authorized travel or (2) the standard meal allowance established by the Internal Revenue Service for other than high-cost locations for the calendar year of the meal expense incurred as provided by the U.S. General Services Administration - Domestic Per Diem Rates. Approved rates for states and cities are found at <http://www.gsa.gov>

Section 3. The Board hereby establishes the following policy to provide further clarification to Class B Travel - Continuous travel of less than 24 hours which involves overnight absence from official headquarters: All travel must be authorized and approved by the Sebastian Inlet Tax District Administrator. When District business requires travel beyond 50 miles from the point of origin, and official District business extends beyond 7:00 pm, overnight lodging may be authorized.

Section 4. This Resolution shall become effective on March 9, 2005.

Upon motion by Commissioner Mitchell and second by Commissioner Culberson, the Board approved the Resolution as follows:

Ann Perry	<u>yes</u>
Jim Culberson	<u>yes</u>
Beth Mitchell	<u>yes</u>
Jenny Lawton Seal	<u>yes</u>
Raymond Reed	<u>yes</u>

The Chair thereupon declared the resolution duly passed and adopted this 9th day of March, 2005.

SEBASTIAN INLET TAX DISTRICT

By: 
Ann Petry, Chair

APPROVED AS TO FORM AND
LEGAL SUFFICIENCY

By: _____
Jack Kirschenbaum
Attorney for Sebastian Inlet Tax District

APPENDIX D - District Public Records and Fee Schedule Procedures

District Public Records Request and Fee Schedule Procedures

1. All public records requests received orally and/or in writing, will be acknowledged by the District within three (3) business days.
2. The District will aim to fulfill all reasonable public records requests with five (5) business days. If a request warrants a longer time to complete, that will be communicated to the requestor within five (5) business days of the request.
3. All requests will be subject to the provisions of 119.07 (4)—fees for copying and the labor time required. The District's labor will be charged at a rate of \$25.00 per hour in half-hour minimum charge increments plus the cost of required supplies. Request responses that require less than 10 copies and/or 30 minutes or less of staff labor to fulfill will not be charged a fee. Responses to requests that can be sent via electronic mail and meet the aforementioned time/staff requirement, will also not be charged. If charges are warranted, the person requesting the records will be contacted and provided an estimate of costs within five (5) business days. If the requestor agrees to the fee and remits payment to the district via check, staff will complete the request and send it by the most economical means.
4. If the request is for Financial records, a **SUMMARY** – if possible – should be provided. ***All records requests responses will be sent via email in PDF format when practicable.***
5. If a Public Record contains personnel information such as a social security number, home address, phone, etc., this part of the record will be redacted prior to being sent to the requestor.
6. Staff must receive acknowledgment from the requestor that the request has been satisfied.

All public records requests will be filed, including the media used and the timing of the response, in the District office and available for viewing upon request.

Florida Statutes mandate that a government entity must respond to Public Record Requests under the Sunshine Law.

The Executive Director must be informed of all requests received by telephone, email, letter, fax and in person.

Board Adopted **MARCH 13, 2024**

ATTACHMENT 2

COMMISSIONER COMMENTS AND SUPPORTING DOCUMENTS



Policy manual

From Dave Barney <dbarney@sitd.us>

Date Fri 3/27/2026 7:41 PM

To James Gray <jgray@sitd.us>

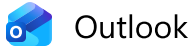
James,

I have reviewed the latest draft of the SID Policy manual, and I have no revisions or additions.

Thanks to everyone involved.

David Barney (Chairman, Sebastian Inlet District)

Get [Outlook for iOS](#)



Re: 3-11-26 DRAFT SID Administrative Policy Manual -- MS Word Version

From John Campbell <johncampbell.sid@gmail.com>

Date Wed 4/1/2026 11:11 AM

To James Gray <jgray@sitd.us>

James

I feel this is very well done and complete. Two very minor comments on my behalf:

Should term limits be mentioned in section 1.3?

And under travel, best airfare isn't necessarily "as far in advance". It is generally considered the cheapest fares are 21-101 days from departure date.

As I said.... Very minor

Best regards

John Campbell

Sent from my iPad

On Mar 17, 2026, at 3:35 PM, James Gray <jgray@sitd.us> wrote:

Good afternoon Commissioners,

It was requested that an MS Word version of the DRAFT SID Administrative Policy Manual presented during the March 11, 2026 Commissioner meeting be shared with the Commission. If you intend to edit the document, please revise in MS Tracked changes mode and only provide your revisions to staff at this time. This will ensure that potential Sunshine violations will be avoided as the policy manual will be on the April 8, 2026 agenda.

Staff will compile all Commissioner revisions and include in the April 8, 2026 Agenda package. As such and if possible, please provide your suggested revisions by March 26, 2026.

Please let me know if you have any questions.

James

<Outlook-zeb3m0ke.png>

James D. Gray, Jr.

Executive Director

(321) 724-5175 (Office)

(321) 591-9216 (Cell)

jgray@sitd.us (e-mail)

[@sebastianinletdistrict](#)

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Sebastian Inlet District

114 Sixth Avenue

Indialantic, FL 32903

<SID Administrative Policy Manual--DRAFT 3-6-26.docx>

<Agenda Item - SID Administrative Policy Manual--DRAFT 3-11-26.pdf>

COMMISSIONER MARSHALL COMMENTS



Re: 3-11-26 DRAFT SID Administrative Policy Manual -- MS Word Version

From TJ Marshall <tjmarshall@sitd.us>

Date Tue 3/31/2026 1:16 PM

To James Gray <jgray@sitd.us>

📎 1 attachment (306 KB)

SID Administrative Policy Manual--DRAFT 3-6-26.docx;

Apologies I could not meet the requested March 26 deadline. Attached is my version of edits and comments in track changes as requested.

Moving forward:

A)

I notice the agenda item document notes:

"Administrative Policy Manuals are common and transparent instruments for local governments, including independent special districts, to formally adopt an internal governance structure and minimize risk."

It would be greatly appreciated if some other such documents could be provided, particularly any related to Special Districts such as ourselves (Jupiter Inlet, etc...)

B)

I request that each version of edits by Commissioners be made available to the public and myself at the meeting. While I have no concerns with staff proceeding with collating as previously stated, I have found such documents with multiple authors extremely messy, confusing and difficult to then add more track changes moving forward.

Again, that is my request that I wish relayed to the Chairman. Please make him aware that anyone can public record request the documents but it seems a bit unfair to ask a Commissioner to pay a fee to see other Commissioner's work to a project that we are ostensibly 'collaboratively' working on.

Related to this (and I am sincerely not trying to pick at an old wound) seems pertinent to note, it would have been perfectly legal within Sunshine according to [AGO 2001-21](#) for Commissioners to share their versions of this document, preferably through you rather than each other, (to avoid response as note in the AGO 2001-21 quote below) before the meeting in order to facilitate robust work on it in front of and including the public at the meeting.

While this office would strongly discourage such activity, it would appear that council members of the City of Port Orange may prepare and distribute their own position statements to other council members without violating the Government in the Sunshine Law so long as the council members avoid any discussion or debate among themselves on these statements. However, to the extent that any such

communication is a response to another commissioner's statement, it may constitute a violation of the Government in the Sunshine Law to circulate the responsive statement."

Best,

TJ Marshall
Sebastian Inlet Taxing District
Commissioner District 1
tjmarshall@sitd.us

From: James Gray <jgray@sitd.us>
Sent: Tuesday, March 17, 2026 3:35 PM
To: James Gray <jgray@sitd.us>
Cc: Stacy Busche <sbusche@sitd.us>; Edward Garland <egarland@sitd.us>
Subject: 3-11-26 DRAFT SID Administrative Policy Manual -- MS Word Version

Good afternoon Commissioners,

It was requested that an MS Word version of the DRAFT SID Administrative Policy Manual presented during the March 11, 2026 Commissioner meeting be shared with the Commission. If you intend to edit the document, please revise in MS Tracked changes mode and only provide your revisions to staff at this time. This will ensure that potential Sunshine violations will be avoided as the policy manual will be on the April 8, 2026 agenda.

Staff will compile all Commissioner revisions and include in the April 8, 2026 Agenda package. As such and if possible, please provide your suggested revisions by March 26, 2026.

Please let me know if you have any questions.

James



James D. Gray, Jr.

Executive Director
(321) 724-5175 (Office)
(321) 591-9216 (Cell)
jgray@sitd.us (e-mail)

[@sebastianinletdistrict](#)



Sebastian Inlet District

SEBASTIAN INLET DISTRICT

ADMINISTRATIVE POLICY OPERATIONS MANUAL

Adopted: _____, 2026

Resolution No.: _____



TABLE OF CONTENTS

- Chapter 1. [Enabling Legislation & Governance Structure](#)
- Chapter 2. [Uniform Special District Accountability Act Compliance](#)
- Chapter 3. [Administrative Authority & Board Procedures](#)
- Chapter 4. [Fiscal Procedures & Financial Controls](#)
- Chapter 5. [Procurement & Contracting](#)
- Chapter 6. [Personnel Policies](#)
- Chapter 7. [Public Records & Records Management](#)
- Chapter 8. [Ethics, Sunshine & Governance Compliance](#)
- Chapter 9. [Internal Controls & Audit Standards](#)
- Chapter 10. [Emergency Authority](#)
- Chapter 11. [Amendments](#)

APPENDIX

- Appendix A – Cash Management Policy – 4-13-22
- Appendix B – Executive Director Spending Authority – Resolution No. 07.10.19-2
- Appendix C – Travel Policy – Resolution No. 2005-1
- Appendix D – District Public Records Request and Fee Schedule Procedures 3-13-24

Commented [TM1]: Upon completing an initial review, recommended changes and comments to this document, my overarching opinion is that much work needs to be done to:

- 1) appropriately align this document to our Charter
- 2) Anchor non-Charter related items specifically to something tangible whether it be a Florida Statute (not a vague Chapter reference), recent Florida Commission on Ethics policy, Roberts Rules, etc..
- 3) Integrate more of the Orientation Guide material that Commissioners had done significant work to refine and this document was professed at the March 2026 SITD mtg to be superceding.
- 4) Ensure areas of intra-related connectivity within the document are duly noted (ex. use "authorized Commissioners" in Section 9.4 needed a notation to reference Section 4.3 where that language is defined)

CHAPTER 1

ENABLING LEGISLATION & GOVERNANCE STRUCTURE

1.1 Establishment

Created as an independent special taxing district by the Florida State Legislature through the passage of Chapter 7976, Laws of Florida, Special Acts of 1919 (“Enabling Legislation”), the Sebastian Inlet District was chartered to maintain the navigational channel between the Atlantic Ocean and the Indian River Lagoon.

1.2 Purpose and Authority

It shall be the duty of the Board of Commissioners of Sebastian Inlet District (District) to construct, improve, widen or deepen, and maintain an inlet between Indian River and the Atlantic Ocean. The powers exercisable by the District, in addition to its charge to maintain the Sebastian Inlet, include environmental preservation and enhancement, ad valorem taxation, eminent domain, interlocal cooperation, acquisition of property, and the power to issue bonds. The District is authorized to conduct such programs and projects as it finds necessary or convenient for sediment bypassing (beach renourishment), erosion control, environmental protection, navigation, boating, recreation and public safety for the operation and maintenance of the inlet and the waters of the Atlantic Ocean and Indian River Lagoon adjacent thereto.

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=0100-0199/0161/0161.html

1.3 Governing Body

The District is governed by a five-member Board of Commissioners as provided in its ~~(Charter or Enabling Legislation)~~ with three (3) Brevard County seats and two (2) Indian River County seats. Property owners within the District’s boundaries in Brevard and Indian River Counties can cast their vote for all eligible Sebastian Inlet District Commission seats during the general election held in November of each even-numbered year. The terms of the Board members shall be staggered, with three (3) Board members standing for election in one general election for a 4-year term, and two (2) Board members standing for election 2 years later at the general election for a 4-year term. Unless specified by Florida Statutes, approval of District policy, budget, contracts, etc., require a minimum of 3 Yay votes. Three members of the Board shall constitute quorum, with two affirmative votes required for business when only 3 members present. Commissioners act collectively as the governing body. ~~Individual commissioners possess no independent administrative authority unless expressly authorized by Board action.~~

Commented [TM2]: This seems orphaned here. If I get the intent correctly, this is attempting to validate authority. I would propose this be framed as current State law on how the District conducts its purpose.

Commented [TM3]: All of this is in our Charter and seems could be stated more concisely as such.

Commented [TM4]: While this is also duplicative of the Charter, it is "operational" in nature. So far, this is my key thought with distilling what should go in this document and what is duplicative to the Charter which should be removed from this document in order to streamline & focus it.

Commented [TM5]: The first sentence is ok but superfluous the "facts" are already previously stated about voting and what it takes to enact policy.

The second sentence while I concur in opinion has no basis of fact in any of the governing documents. It sets an extra bar to the oversight role of the commission that doesn't exist in governing documents.

1.4 Officers

Upon being duly elected. The Board shall elect a Chair, Vice-Chair, and Secretary/Treasurer (may be combined) as required by the Charter.

Operationally, this has been interpreted to allow. ~~Officers serve two-year terms which coincide with the rotating district wide election cycle of commission members.. or until successors are elected.~~

~~The officers of this Commission shall be a Chair, Vice-Chair, Secretary/ Treasurer.~~ The position of Secretary and Treasurer may be combined and held by one Commissioner.

While the Charter does not list officer duties, operationally the commission has generally prescribed them as follows:

Chair - As the presiding officer of the Board, the Chair has the power to: shall:

- Call Special Meetings as authorized by Section 3 (d) of the Charter.
- At every meeting call the Board to order, call the roll on the appearance of a quorum, and proceed to the business of the Board
- Run all meetings of the Board.
- Be the official signatory of the Board on documents pertaining to Board approved matters. Sign all ordinances enacted and resolutions adopted by the Board
- Authorize the placing of items on the Regular Agenda and the removal of items from the Consent Agenda
- Manage meeting agendas with assistance from the Executive Director. Exercise the powers granted by these Rules and Policies to the Chair or to the presiding officer
- Act as spokesperson for the Board. Present, or designate another Commissioner to present, all awards, resolutions and honors presented on behalf of the Board
- Perform such other duties as the Board may direct

The duties of the Vice-Chair

- shall include performance Perform of all duties of the Chair, in the temporary absence, disability or conflict of the Chair.

The duties of the Secretary/Treasurer shall include the following is asked to:

Commented [TM6]: As I see it in the Charter, the wording here needs to be flipped around. "Upon being duly elected or appointed...". That is how the SITD is supposed to operate as I read the Charter.

Commented [TM7]: This is not in the Charter. I get the desire but we simply can't set a standard for future Commissioners to have to adhere to. The only thing the Charter requires is "The Board shall conduct all meetings in accordance with chapter 286, Florida Statutes." Like the link at the beginning regarding FL Law on Beach Management, this would be a good place for a link to FS 286 pertaining to meetings..

Alternatively, if this iteration of the Commission likes this type of structure, we keep it but add to this document that it must be ratified each election cycle.

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- ~~Ensure the r~~Recording the minutes of all meetings unless done by staff of all meeting minutes in coordination with staff.
- ~~Providing~~ Ensure notices for all meetings unless done by staff in coordination with staff.
- Custodial care of all funds and investments of the District
- ~~Ensure the m~~Maintenance of financial records and a report thereon at each quarter in coordination with staff. unless provided by staff
- Such other financial duties as may be directed by the Commission

Commented [TM8]: This captures the need in Section 3.4 below for two pairs of eyes to assist in the meeting minutes "reflect the 'SUBSTANCE' of matters considered".

Commented [TM9]: This is good for holding a Commissioner accountable for the 7 day regular meeting notice required by the Charter.

Commented [TM10]: DEFINITELY should talk about this considering the millions of dollars at stake.

First, there is nothing I see in the Charter about this - so it's more of a "operationally the Commission has..." type of thing.

Second, I would be surprised if there wasn't some FL statute related to this type of role/duty that should be referenced.

Third, IMO this should be "in conjunction with" type of duty that creates a check & balance protection - I would be amenable to the "Bookkeeper" since the Charter is Section 3(e) directly notes the need for bookkeeping and operational the commission has seen the need for a role of Bookkeeper on staff.

Commented [TM11]: IF THIS material is directly pulled from FS 286, I would be ok with that. Otherwise see my previous comment regarding this type of thing.

Commented [TM12]: This needs at least some bullet points are a short paragraph giving a new commissioner some concept of the components of FS189.03 - purpose being, so they have an idea of how they are supposed to "operate" within this law that governs the District

CHAPTER 2

UNIFORM SPECIAL DISTRICT ACCOUNTABILITY ACT COMPLIANCE

The District shall comply with Chapter 189.03, Florida Statutes.

CHAPTER 3

ADMINISTRATIVE AUTHORITY & BOARD PROCEDURES

3.1 ~~Role~~ Authority of the Board

The ~~SITD Charter grants the Board governing body (Board)~~ "shall have all the powers of a body corporate". While the Charter also states "The Board shall elect a Chief Engineer", in recent practice the Board:-

- ~~Hires an Executive Director who in turn, maintains a staff and contracts a Chief Engineer~~
- Governs, establishes policy, and adopts resolutions
- Annually adopts budget and millage rate
- Approves contracts
- ~~Evaluates the Executive Director~~
- ~~Retains the power to terminate any agent or employee of the Board of Commissioners or District at any time as authorized by the Section 15 of the Charter.~~

3.2 Role of the Executive Director

While an Executive Director is not required by the Charter, over time, past Board's have seen the efficiency and value of maintaining an Executive Director as the complexity of regulatory compliance required by law of the Board has evolved. The Board has developed a Job Description for the role of Executive Director that includes operational duties such as: The Executive Director:

- Serves as chief administrative officer and shall be responsible for the general and day-to-day administration of the District, subject to the direction and authority of the Board
- Implements Board policy
- Develops and proposes a budget to the Board.
- , recommends, implements, administers, reviews and monitors the District's budget as approved by the Board
- Supervises all District staff and consultants
- Oversees operations, procurement, programs and projects, grants, and compliance
- Prepares agendas and meeting materials for
- Serves as a spokesperson for the District, attends public meetings, and works with the public to identify the needs and interests of the surrounding communities and to promote the District's interests and objectives
- Performs such other duties as may be required by the Board
- Co-signs payments (checks) with an authorized member of the Board (see 4.3 below)

All District operational direction flows through the Executive Director.

3.3 Board Meetings

While Section 3 (d) of the District Charter has general requirements regarding meetings such as being open to the public, adhering to chapter 286, Florida Statutes, and notice of the meeting time, date, location and purpose made at least 7 days in advance, operationally the Board has opted for;

- ~~All meeting shall be open to the public~~
- Regular meetings: The Board meets on the 2nd Wednesday of each month. Meeting location and time alternate between Indian River and Brevard counties to better serve constituents residing within the District's boundaries in both counties.

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- Public meetings are noticed in the local newspapers one week prior to the meeting and on the District website.
- Meeting agendas and packages are located on the District website (www.sitd.us)
- Workshops: As needed. Notice will be provided in the same manner as for regular meetings.
- Special meetings As needed, have specific compliance requirements in Section 3 (d) of the Charter. : ~~As needed.~~ ~~Operatively,~~ two days written notice of the time and purpose of a special meeting shall be given to all members, the news media, and will be posted (on website)
- Emergency meetings: Where there is an immediate danger to public health, safety, or welfare that requires immediate action, the Board may hold an emergency meeting. The Board must give notice by a procedure that is reasonable under the circumstances and necessary to protect the public interest.

3.4 Board Meeting Minutes

- **Statutory Authority**
 - Pursuant to **Section 286.011(2), Florida Statutes**, minutes of all meetings of the Board shall be promptly recorded and maintained as public records.
- **Nature of Minutes**
 - Board minutes are intended to serve as an official summary record of actions taken by the Board. The purpose of Board minutes is to document official action of the Board as a body.
 - Minutes shall:
 - Identify the date, time, and location of the meeting
 - Identify Board members present and absent
 - Record motions, seconds, and vote outcomes
 - Reflect official actions taken
 - Provide a concise summary of discussion sufficient to reflect the substance of matters considered
- **Attribution of Individual Comments**
 - Florida law does not require detailed attribution of individual comments made during Board discussion

Commented [TM13]: We should talk about this.

I realize its 'subjective' to who is dictating them and I definitely don't want to get into long edits to minutes at meetings YET if the intent is to "reflect the 'SUBSTANCE' of matters considered", there needs to be better directive on adherence to that policy.

- In operation the District prepares summary-style minutes; the Board formally directs otherwise by majority vote
 - Individual Board members may request that their vote be recorded, which shall be reflected in the minutes as required by law.
 - ~~Individual Board Members, at a meeting, may request the minutes to reflect a comment or point made they believe is substantive to the matter being discussed.~~
 - ~~Individual Board Members, at a meeting, may request the minutes to reflect a comment or point made they believe is substantive to the matter being discussed.~~
- **Recording of Meetings**
- Audio or video recordings, when made, are public records but do not replace the statutory requirement for written minutes

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CHAPTER 4

FISCAL PROCEDURES & FINANCIAL CONTROLS

~~While Section 3 (e) and (f) of the District Charter have general requirements for all bookkeeping and accounting meet requirements of law for special districts and all purchasing and bidding be in accordance with the procedures used by the Brevard County Board of Commissioners, the growing complexity of District Operations and Florida Statue requirements have evolved operations to include:~~

4.1 Budget Process

The Executive Director ~~coordinates the shall~~ preparation of a proposed annual budget every [Month of Year desired] ~~that ensures and coordinate~~ all TRIM requirements ~~are met. Budget adoption~~ Review of the proposed budget by the Board and ultimately approval of a budget occurs [Month(s) of Year desired] ~~shall occur~~ through properly noticed public hearings.

Commented [TM14]: Please use full name with (acronym) the first time used so new commissioners in the future have an easier understanding.

4.2 Accounting System

~~The District currently uses QuickBooks Desktop (approved governmental accounting software) to~~ The District shall maintain a standardized Chart of Accounts to ensure compliance with Section 3 (e) of the Charter. ~~and utilize approved governmental accounting software. The District currently uses QuickBooks Desktop.~~

4.3 Payment Authorization

~~The District utilizes a co-approve and co-sign policy by authorized check signers that include the Executive Director and the Commission Chair or the Commission Secretary/Treasurer.~~

~~The payables are paid semi-monthly by the Contracts/Accounting Manager. All ACH payments and check payments are reviewed and approved by the Executive Director and one of the authorized Commissioners. Checks are signed by the Executive Director and one of the authorized Commissioners. Authorized check signers for the District include the Executive Director, the Commission Chair and the Commission Secretary/Treasurer.~~

4.4 Banking and Investments

The District has a checking account and a money market account with PNC Bank. The checking account carries a balance of \$25K and the excess is “swept” into a money market account which accrues interest.

District surplus funds shall be invested in accordance with Florida Statutes and the District’s adopted Cash Management Policy. The District currently utilizes Florida PRIME through the State Board of Administration (SBA). The opening of the Florida PRIME account was approved by the Board in October 2021.

Florida PRIME is a government investment pool that offers management by Federated Hermes. The Pool offers investors experienced, government-level liquidity management, conservative investment policies, an extensive governance framework, a Standard & Poor’s “AAAm” rating, full transparency, and best-in-class financial reporting. It serves over 850 users in Florida and is made up of approximately \$24.6 billion in public funds. The website is: <https://prime.sbafla.com>.

On April 01, 2022, the Commission authorized staff to conduct a monthly transfer of funds in excess of \$5 million dollars in the PNC Bank account to the Florida PRIME account. (Appendix A – Cash Management Policy).

4.5 Internal Controls

The District shall maintain:

- Monthly bank reconciliations
- Segregation of duties where feasible
- Annual independent/single audits
- Tiered approval for accounts payable (Executive Director and authorized Commissioner review and approval)

Commented [TM15]: This needs work.

Some issues I see are:
Surplus Funds aren't clearly defined - are they money market funds or funds in investments?

Florida Statutes are noted but not specified. Future Commissioners should not be made to guess and search Florida statutes for what we're complying to with such an important issue.

This first use of Cash Management Policy should be followed by the reference to (Appendix A) .

If a future board is to be held to the policy of a past rendition of the Board, the authorizing item should be in the Appendix so future boards can see it. (I realize it may be already with the Cash Management Policy but the Appendix is not included with this MS Word document review).

Commented [TM16]: This too seems vague and I would be surprised if the Florida Statutes did not have specific regulatory rules directing some of the things listed.

If that's the case, then the link between our Charter requiring adherence to law for special districts should be more clearly made.

CHAPTER 5

PROCUREMENT & CONTRACTING

The District Charter requires notes both that the Board has the right to reject any and all bids as well as requires all purchasing and bidding shall be in accordance with the procedures used by the Brevard County Board of Commissioners which are the same as shall comply with all applicable procurement laws under Chapter 287, Florida Statutes, including regarding competitive bidding requirements, statutory thresholds and internal procurement processes.

The Executive Director may execute contracts up to a Board-approved spending threshold (\$10,000) without prior Board approval, subject to ratification at the next Board meeting. (Appendix B – Executive Director Spending Authority - Resolution No. 07.10.19-2).

In the event of an emergency and consistent with the District Charter, the Board is authorized to use alternative procurement procedures to spend a sum not to exceed \$15,000 in accordance with specific procedures in the District Charter.-

Commented [TM17]: Is this right? Seems we need to make sure we tie things back to what our Charter says and how operationally we may have expanded beyond that.

Commented [TM18]: IT would be good to use the same style as section 4.4 when a previous Board policy was twice referenced.

"...approved by the Board in October 2021[date]."

or

"On [date] April 01, 2022, the Commission authorized..."

CHAPTER 6

PERSONNEL POLICIES

6.1 Employment Status

The District Charter specifically notes in Section 15 The Chief Engineer, any Consulting Engineer, and any agent or employee of the Board of Commissioners or District may be removed at any time by the Board.

All employees are at-will unless otherwise specified by written contract.

Commented [TM19]: If there are employee contracts that bind a future Board to "buy out" or pay a penalty to adhere to the Charter, that needs to be an Appendix item; both the contract and the authorizing Board item binding future Boards.

Commented [TM20]: This is pretty weak IMO. If we're going to give employees this operation manual (not sure if this is for Commissioners only), then we should be more specific. There are policies by FL Statute and policies recommended by the FL Commission on Ethics.

Most importantly, employees should be given an alternative method of reporting if they believe they are regulated to reporting poor conduct by a supervisor only to that supervisor.

IMO employees who have concerns such as that should be authorized to bring that concern to the Chairman if they so choose. Since the Board itself is ultimately responsible if an employee takes action against the District designating a person on the Board for employees to turn to in such an instance seems reasonable.

6.2 Standards of Conduct

Employees shall maintain professional conduct and comply with all applicable ethics and workplace policies.

Harassment, discrimination, retaliation, and disruptive conduct are prohibited.

6.3 Travel & Reimbursement Policy

The District shall comply with the Travel Policy adopted by the Board on March 9, 2005. (Appendix C – District Travel Policy – Resolution No.2005-1).

Commented [TM21]: Some introductory paragraph seems warranted here. It would be my expectation that numbers weren't chosen out of thin air by a previous Board but were built upon something like FL Statutes, Ethics or Special District policies used elsewhere.

The Travel Policy establishes procedures for authorization and reimbursement of travel expenses incurred by District employees and officials in the performance of official District business.

A. Transportation

- Travel shall be by the most efficient and economical means available
- Air travel shall be booked as far in advance as practical to obtain the lowest reasonable fare
- Use of a personal vehicle shall be reimbursed at the IRS standard mileage rate in effect at the time of travel. Tolls and parking fees will be reimbursed when documented

B. Lodging

- Lodging should be reserved in advance at the lowest reasonable rate.
- Florida sales tax exemption shall be requested when applicable.
- Travelers shall verify lodging charges at check-in and check-out.

C. Meal Expenses

- Meal reimbursements shall follow federal per diem rates (GSA M&IE)
- Alcoholic beverages and tobacco products are not reimbursable under any circumstances.

D. Per Diem Advances

Advance per diem payments are not permitted unless specifically authorized by Board policy.

E. Documentation & Reimbursement

- All travel reimbursement requests must be submitted within ten (10) business days of return.
- Reimbursement requests must include itemized receipts and proof of payment.
- Reimbursements are subject to review by the Executive Director and approval by the Board when required.

Commented [TM22]: This is open ended language for an ops manual. Both the "subject to" and "when required".

Policies shouldn't be subjective.

IF I get the drift correctly, the ED reviews expenses for staff and the Commissioners. Conversely, the Commission reviews expenses by the ED?

CHAPTER 7

PUBLIC RECORDS & RECORDS MANAGEMENT

7.1 Compliance with Chapter 119, Florida Statutes

The District complies with Chapter 119, Florida Statutes, and applicable public records retention schedules issued by the Florida Division of Library and Information Services.

The Executive Director, or his or her designee, shall serve as the Custodian of public records charged with the responsibility of maintaining public records.

Public records means all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.

7.2 District Public Records Request and Fee Schedule Procedures

In addition to Florida Statutes, all public records requests received orally and/or in writing shall follow the District Public Records Request and Fee Schedule Procedures adopted by the Board on March 13, 2024. (Appendix D).

The Executive Director must be informed of all public records requests received by telephone, email, letter, fax, or in person.

Commented [TM23]: This is a statement not a policy. More so, its a regulatory requirement so it would seem that the "how" the District complies is the important part to include here.

Commented [TM24]: Ditto my previous comment here is well "how" is the ED maintaining public records is what an operations manual should include IMO

Commented [TM25]: Recognizing the new requirement by law for government entities to accept payment by credit card and other services (I believe) that should be included here.

More importantly, it appears the new law should roll that March 2024 policy back on to the agenda in the near future to be revised and compliant with the new law

CHAPTER 8

ETHICS, SUNSHINE & GOVERNANCE COMPLIANCE

8.1 Commissioner Conduct & Professional Civility

A. Purpose

~~The Board of Commissioners affirms that effective governance requires professionalism, mutual respect, and adherence to ethical standards. This section establishes expectations~~

Commented [TM26]: This is all included in the Sunshine Law that Commissioners and now Executive staff are required to take a 4hr course every year.

A commission cannot bind a current or future elected official to a policy beyond current statutory guidelines.

If the operation manual wishes to reference portions of the FL commission on Ethics publications or FL Statutes regarding the Sunshine Law, that's fine.

The only other recourse is a complaint according to FL Statutes or to the FL Commission on Ethics.

~~for commissioner conduct to promote orderly meetings, protect staff from inappropriate interference, preserve public confidence in District leadership, and minimize District risk.~~

~~B. Standards of Professional Conduct~~

~~Commissioners shall:~~

- ~~• Treat fellow commissioners, staff, consultants, and members of the public with dignity and respect~~
- ~~• Refrain from personal attacks, disruptive behavior, or conduct that undermines orderly proceedings~~
- ~~• Avoid conduct that could reasonably be perceived as harassment, intimidation, or retaliation~~
- ~~• Respect the distinction between the branches of government: Legislative (Board role), Legal (Attorney role) and Executive (Executive Director role)~~

~~C. Operation within Administrative Structure~~

~~Individual commissioners shall not:~~

- ~~• Direct or supervise staff outside Board action~~
- ~~• Demand operational changes outside Board action~~
- ~~• Conduct independent investigations without Board authorization~~
- ~~• Interfere with vendor, consultant, or stakeholder relationships outside Board action~~

~~All operational inquiries shall be directed to the Executive Director.~~

~~D. Meeting Decorum~~

~~The Chair is authorized to maintain decorum during meetings. Deliberations of the Board of Commissioners shall be conducted pursuant to Robert's Rules of Order. The Chair shall exercise care that the right of each Commissioner to be heard is respected, and that the actions of the Board are clear. In controversial deliberations, strict adherence to Robert's Rules of Order may be invoked by the Chair, or any Commissioner by raising a point of order. The latest published edition of "Robert's Rules of Order" shall be the parliamentary authority for all matters of procedure.~~

~~E. Corrective Measures~~

~~If conduct concerns arise, the Board may address the matter through:~~

- Board discussion in open session
- Formal reminder of policy
- Referral to ethics training
- Other lawful corrective measures

This section is intended to reinforce professionalism and does not limit statutory remedies available under Florida law.

8.2 Board Member Communications Outside Public Meetings

A. Purpose

In recognition of the fact that the Board has no way of knowing what matters may or may not come before it for action and that matters relating to the Board and its powers, duties and areas of interest may come before the Board for action, the Board adopts a communication rule to prevent inadvertent violations of the Sunshine Law, limit potential liability of the District and commissioners, and ensure strict compliance with open government requirements:

B. Prohibited Communications

Pursuant to Florida's Sunshine Law, commissioners shall not email, text, message, call, or otherwise communicate with one another regarding any District business outside a duly noticed public meeting:

This prohibition applies regardless of whether the matter is:

- On a current agenda
- Anticipated for a future agenda
- Described as informational only
- Characterized by the communicating commissioner as not foreseeable for Board action

All discussion of District business shall occur only during properly noticed public meetings.

C. Serial Communications Prohibited

Commissioners shall not engage in serial or "daisy chain" communications for the purpose of discussing District matters outside a public meeting.

D. Staff as Intermediaries Prohibited

~~Commissioners shall not use staff or consultants to convey positions, opinions, or preferences to other Commissioners outside public meetings.~~

E. Permitted Communications

~~Permitted communications include:~~

- ~~1. Administrative scheduling coordination not involving District business discussion~~
- ~~2. One-way informational distribution from the Executive Director~~
- ~~3. Communications during duly noticed public meetings~~
- ~~4. Communications unrelated to District business~~

~~District Business means any matter involving officials acts, transactions, or discussions that fall within the Board's governmental authority and decision-making responsibilities, including but not limited to operational matters, budget discussions, and policy development.~~

F. Social Media

~~Commissioners shall not engage in interactive discussions with one another concerning District business on social media or digital platforms outside public meetings.~~

G. Inadvertent Communications

~~If a Commissioner receives a District-related communication from another Commissioner outside a public meeting, the recipient shall refrain from responding and notify the Executive Director for retention of public records and may request legal counsel to provide an opinion.~~

CHAPTER 9

INTERNAL CONTROLS & AUDIT STANDARDS

9.1 Purpose

The District Charter states all bookkeeping and accounting of the District shall meet the requirements imposed by law for special districts and is operationally interpreted to include the requirements of Florida Statutes for Special Districts regarding audits and internal

Commented [TM27]: I suggest this be moved to be Chapter 6 to keep all the financial style operations, policies together.

controls (Reference specific FS). The District shall maintain a system of internal controls designed to safeguard public funds, ensure reliability of financial reporting, promote operational efficiency, and ensure compliance with applicable laws and regulations.

9.2 Control Environment

~~The Board and Executive Director shall establish a tone at the top emphasizing integrity, transparency, and accountability.~~ **Independent Audit**

~~The District shall engage an independent certified public accountant annually in accordance with Chapter 218, Florida Statutes. Single Audits will be conducted when required. Annual audits shall be presented at a public meeting.~~

9.3 Segregation of Duties

~~To the extent practical given staffing levels,~~ Financial responsibilities shall be segregated to prevent any single individual from controlling authorization, custody, and recordkeeping functions.

Commented [TM28]: This is a gaping loophole inappropriate for an Operations Manual.

9.4 Authorization & Approval Controls

- All contract authorizations require Board approval ~~unless specifically delegated or specific delegation by the Board.~~
- Contracts must be executed in accordance with Florida Statutes (#), District Charter and adopted procurement policies noted in Chapter 5 of this Operation Manual
- All ACH payments and check payments are reviewed and approved by the Executive Director and one of the authorized Commissioners noted in Chapter 4.3 of this Operations Manual.
- Opening or modifying District financial accounts and wire transfer authorizations shall be formally authorized by Board action

9.5 Reconciliations

- Monthly bank reconciliations shall be performed and reviewed.
- Investment statements shall be reconciled monthly.
- Variances between budget and actual expenditures shall be reported to the Board quarterly.

Commented [TM29]: By whom? This needs specificity so Commissioners know there is accountability and new Commissioner clearly understand the controls in place.

9.6 Physical & Digital Safeguards

Commented [TM30]: HOW? and WHO? Operations Manuals are great only if they define the who & how.

The District shall maintain safeguards over:

- Check stock and financial instruments
- Online banking credentials
- Electronic accounting systems
- Sensitive personnel and legal records

9.7 Independent Audit

~~The District shall engage an independent certified public accountant annually in accordance with Chapter 218, Florida Statutes. Single Audits will be conducted when required. Annual audits shall be presented at a public meeting.~~

9.8 Fraud Reporting

~~Any agent or employee of the Board of Commissioners or District who suspects fraud, misuse of public funds, or financial irregularity are encouraged to report such suspicions immediately to either the Board Chair, Board Treasurer, Executive Director, and/or legal counsel with the express protection of the Board from retaliation by the individuals' immediate person of supervision.~~

~~Any such reports received are to be brought to the Board upon which an investigation, which avoids conflicts of interest to parties implicated, shall be directed to be performed.~~

CHAPTER 10

GRANT OF EMERGENCY AUTHORITY TO EXECUTIVE DIRECTOR

~~In extraordinary emergency circumstances that immediately threatening life, safety, or District property wherein the delay of two day notice for a Special Meeting risks irreparable harm, the Executive Director, upon consultation with the Chair or a Board member if the Chair is not immediately available, is authorized to take may take necessary action consistent with the District Charter and all applicable laws. Florida law. Upon exercise of such emergency authority the Chairman must call a Special Meeting of the Board to receive a reporting of the incident, ratify actions taken and authorize any further activity. At emergency actions shall be reported to and ratified by the Board at the next public meeting.~~

Commented [TM31]: Need to define Florida Statue.

CHAPTER 11

AMENDMENTS

This Administrative Policy Manual may be amended by resolution of the Board of Commissioners at a duly noticed public meeting.

CHAPTER 12

CHARTER AND CONFLICTS

The District Charter and all applicable laws supersede any conflicts in guidance this Operation Manual provides.

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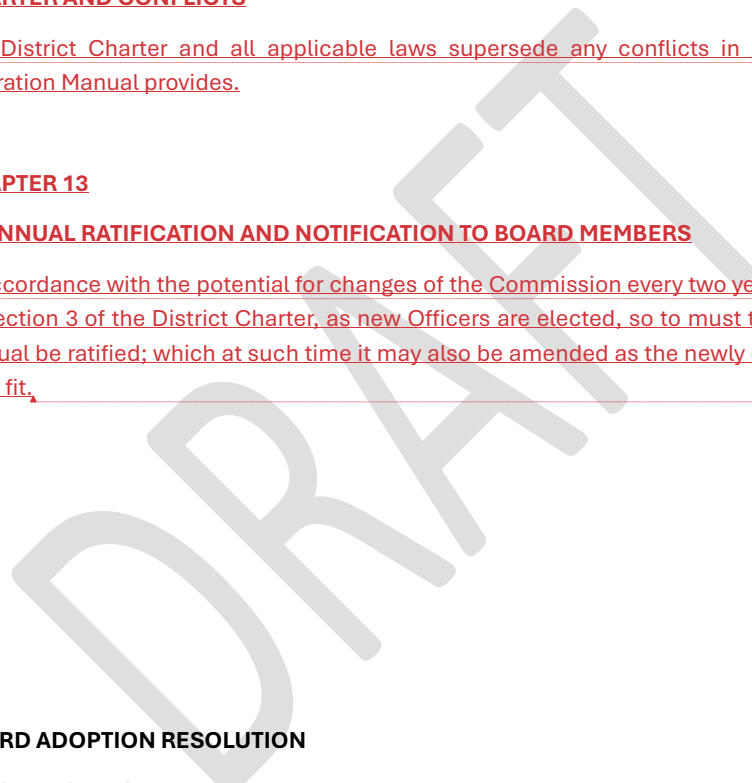
CHAPTER 13

BI-ANNUAL RATIFICATION AND NOTIFICATION TO BOARD MEMBERS

In accordance with the potential for changes of the Commission every two years according to Section 3 of the District Charter, as new Officers are elected, so to must this Operation Manual be ratified; which at such time it may also be amended as the newly elected Board sees fit.

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BOARD ADOPTION RESOLUTION

RESOLUTION NO. _____

A RESOLUTION OF THE SEBASTIAN INLET DISTRICT ADOPTING AN ADMINISTRATIVE POLICY MANUAL; PROVIDING FOR IMPLEMENTATION; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Sebastian Inlet District is an independent special district of the State of Florida; and

WHEREAS, the Board of Commissioners finds it ~~necessary and~~ appropriate to adopt a ~~comprehensive Administrative Policy Operations~~ Manual ~~to provide structure, transparency, and compliance with~~ applicable ~~to~~ Florida law; and

WHEREAS, the Board desires to establish clear ~~guidance to any agent or employee of the Board of Commissioners or District regarding whom and how~~ governance procedures, financial controls, personnel standards, procurement practices, ~~and~~ public records compliance, ~~are to be executed and Sunshine Law safeguards;~~

THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE SEBASTIAN INLET TAX DISTRICT, AS THE GOVERNING BOARD OF THE SEBASTIAN INLET TAX DISTRICT:

Section 1. The ~~Administrative Policy Operations~~ Manual attached hereto is hereby adopted.

Section 2. The Executive Director is authorized to implement and administer the Manual.

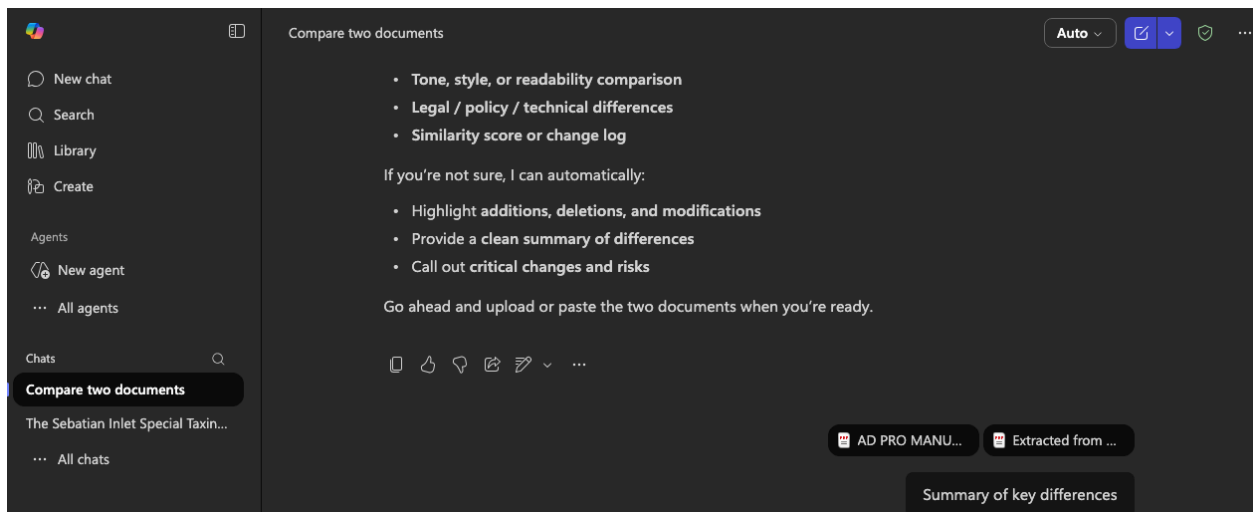
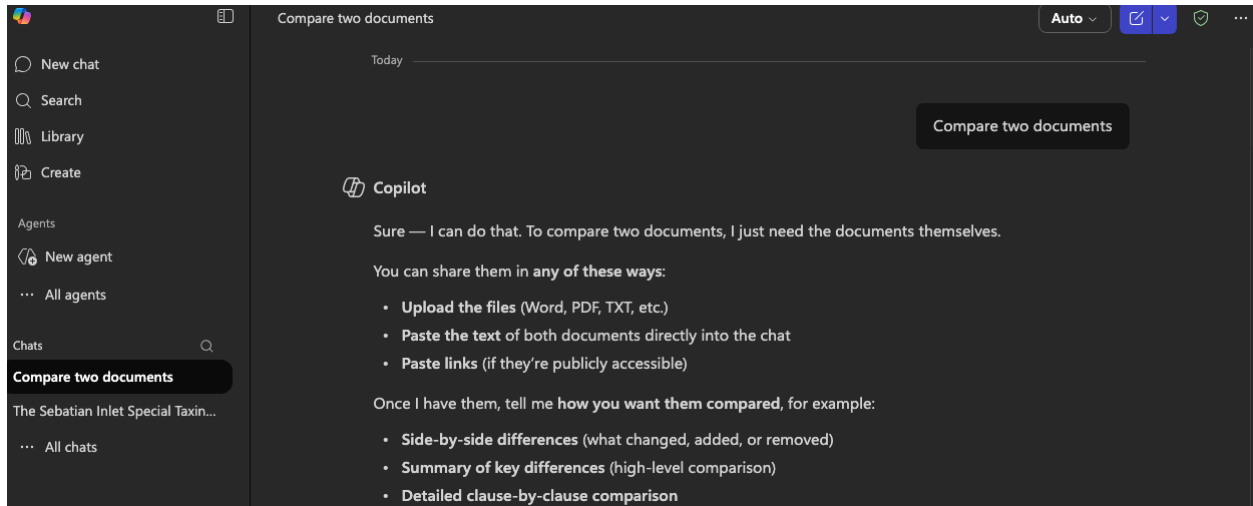
Section 3. This Resolution shall take effect immediately upon adoption.

DONE, ORDERED AND ADOPTED this ___ day of _____, 2026.

David Barney, Chairman

APPROVED AS TO FORM AND LEGAL SUFFICIENCY

Shawn L. Demers, Esq.



Below is a **concise summary of the key differences** between the two documents you uploaded:

- **Document A:** *Administrative Policy Manual – Adopted March 13, 2024* (Jupiter Inlet District)
- **Document B:** *Draft Sebastian Inlet District Administrative Policy Manual* (presented March 11, 2026 agenda)

Executive Summary

The **2026 Sebastian Inlet Draft Manual** represents a **major structural and governance modernization** compared to the **2024 Jupiter Inlet Manual**, shifting from a highly operational, detail-heavy approach to a **policy-driven, risk-management-focused framework**. The draft

significantly tightens **ethics, Sunshine Law compliance, commissioner conduct, internal controls, and administrative authority**, while deliberately removing many day-to-day operational details from board-level policy.

Key Differences by Theme

1. Purpose and Philosophy

2024 Manual (Jupiter Inlet)

- Operational handbook style
- Extensive step-by-step procedures (banking, invoices, check writing, office hours, records inventory)
- Blends **policy + operations + staff job instructions**

2026 Draft Manual (Sebastian Inlet)

- Governing policy framework
- Focus on **roles, authority, accountability, and legal compliance**
- Explicit intent to **minimize risk**, Sunshine Law exposure, and governance confusion

✓ **Shift:** From “how staff does the work” → to “who has authority and under what rules”

2. Board vs. Executive Director Authority

2024 Manual

- Board deeply embedded in operations
- Detailed requirements for:
 - Bill approvals
 - Banking transactions
 - Invoice formatting
 - Treasurer reporting mechanics
- Less separation between governance and management

2026 Draft

- Clear separation of powers:
 - Board governs, sets policy, approves budgets/contracts, evaluates ED
 - Executive Director is sole operational authority
- Explicit language:
 - *“All District operational direction flows through the Executive Director”*
 - Individual commissioners have **no independent authority**

✔ **Key Change:** Stronger “manager form of government” structure

3. Ethics, Sunshine Law, and Commissioner Conduct

2024 Manual

- General statutory references
- Ethics largely handled through appended Florida Statutes
- No detailed commissioner behavior standards

2026 Draft

- Entire chapter devoted to governance compliance
- New, explicit rules on:
 - Commissioner professionalism and civility
 - Prohibition on directing staff
 - Strict Sunshine Law communications bans
 - Social media restrictions
 - Serial communication prohibitions
- Enforcement and corrective measures identified

✔ **Major Addition:** Clear behavioral expectations and guardrails for commissioners

4. Financial Controls and Risk Management

2024 Manual

- Highly detailed mechanics:
 - Check writing process
 - Wire transfer steps

- SBA transaction workflows
- Invoice numbering explanations
- Controls implied through process detail

2026 Draft

- High-level internal control framework:
 - Segregation of duties
 - Dual approvals
 - Reconciliations
 - Audit and fraud reporting standards
- Fewer procedural steps, more accountability structure

✓ **Change:** From procedural compliance → to audit-defensible control standards

5. Procurement and Contracting

2024 Manual

- Director authority capped at **\$5,000**
- Heavy statutory explanation
- Board approval deeply embedded in processes

2026 Draft

- Executive Director authority increased to **\$10,000**
- Explicit ratification process
- Emergency spending authority clearly defined
- Procurement governed by statute + board-approved thresholds

✓ **Change:** Faster operations with maintained board oversight

6. Personnel Policies

2024 Manual

- Very detailed HR manual:

- PTO accrual tables
- Holidays
- Insurance benefits
- Retirement plans
- Parental leave
- Reads like an employee handbook

2026 Draft

- Lean personnel chapter:
 - At-will employment
 - Standards of conduct
 - Anti-harassment language
 - Travel handled by adopted policy appendix
- Benefits largely removed from core policy

 **Change:** Personnel administration moved out of board policy level

7. Public Records Handling

2024 Manual

- Extensive record inventory, logs, retention mechanics
- Detailed, staff-oriented procedures

2026 Draft

- Reinforces statutory compliance
- Centralizes responsibility with Executive Director
- Refers to adopted fee schedule and procedures by appendix

 **Change:** Centralized authority and simplified policy references

8. Emergency Authority

2024 Manual

- Emergency authority discussed indirectly through meeting rules

2026 Draft

- Stand-alone chapter:
 - Executive Director empowered to act immediately
 - Mandatory board ratification afterward

✅ **Improvement:** Clear, legally defensible emergency response authority

Bottom Line

The **2026 Sebastian Inlet Draft Manual** is:

- More modern
- More legally defensive
- Better aligned with best practices for special districts
- Designed to reduce commissioner risk and operational micromanagement

The **2024 Jupiter Inlet Manual** is:

- Much more detailed operationally
- Better as a staff reference
- Higher risk for governance overreach and Sunshine Law exposure

If you'd like, next I can:

- ✅ Flag **specific policy language that is most likely to generate controversy**
- ✅ Identify **sections that materially change commissioner power**
- ✅ Create a **one-page comparison brief for board discussion**
- ✅ Highlight **legal risk reductions introduced in the 2026 draft**

Just tell me how you want to use this comparison.

Copilot

Below are the **policy changes in the 2026 Draft Sebastian Inlet District Administrative Policy Manual** that are **most likely to be controversial**, generate commissioner concern, or prompt public/legal debate—especially when compared to the **2024 Jupiter Inlet District Manual**.

I've grouped them by **why they tend to be controversial**, not just what changed.

1. Strict Prohibition on Commissioner Communications (Sunshine Law Expansion)

What Changed

The draft manual **goes far beyond statutory minimums** by explicitly prohibiting:

- Emails, texts, phone calls, or messages between commissioners on *any* District business
- “Informational only” communications
- Discussions about matters **not yet on an agenda**
- Serial or “daisy-chain” communications
- Using staff or consultants as intermediaries
- Interactive engagement with each other on social media

Why This Is Controversial

- Commissioners often believe they are allowed to share “harmless information”
- Some long-serving board members may view this as **overly restrictive** or distrustful
- It effectively eliminates informal consensus-building
- Creates fear of inadvertent violations

Likely Pushback

“We can’t even clarify facts with each other?”

“This goes further than state law.”

Risk vs. Benefit

-  **Strong legal protection**

- **✗ Reduced board collegiality**

2. Explicit Limits on Individual Commissioner Authority Over Staff

What Changed

The draft states that **individual commissioners may not:**

- Direct or supervise staff
- Request operational changes
- Conduct independent investigations
- Interfere with vendors or consultants
- Communicate operational concerns except through the Executive Director

Why This Is Controversial

- Removes informal influence historically exercised by commissioners
- Forces all operational concerns through one channel
- May be perceived as “gagging” elected officials

Contrast With 2024 Manual

The 2024 manual implicitly allowed commissioner involvement via operational processes and approvals.

Flashpoint Language

“Individual commissioners possess no independent administrative authority...”

This sentence alone often triggers concern.

3. Empowering the Chair to Enforce Decorum and Robert's Rules

What Changed

- Chair is explicitly authorized to:
 - Maintain decorum
 - Invoke Robert's Rules strictly
 - Control proceedings when conduct issues arise

Why This Is Controversial

- Raises concerns about **selective enforcement**
- Can be perceived as concentrating power in the Chair
- Risk of politicizing meeting control

Likely Debate

"What if the Chair abuses this authority?"

"Who polices the Chair?"

4. Formal Standards for "Professional Civility" With Corrective Measures

What Changed

The draft introduces enforceable expectations for:

- Respectful conduct
- No harassment or intimidation
- No public disparagement of staff or commissioners
- Corrective actions including:
 - Public reminders
 - Ethics training
 - Other lawful corrective measures

Why This Is Controversial

- Conduct standards are subjective
- Fear of weaponization against outspoken commissioners
- Raises questions about enforcement authority

New Territory

The 2024 manual largely avoided regulating **commissioner behavior**, relying instead on statutes.

5. Increased Executive Director Spending Authority (\$10,000)

What Changed

- Executive Director may execute contracts up to **\$10,000 without prior board approval**
- Only ratification required afterward
- Emergency spending authority clarified

Why This Is Controversial

- Reduces pre-approval by the board
- May concern commissioners focused on fiscal control
- Seen as a “power shift” toward staff

Comparison

- 2024 authority: \$5,000
- 2026 draft doubles that threshold

6. Reduced Board Involvement in Financial Mechanics

What Changed

The draft:

- Removes detailed check-writing, wire transfer, and invoice approval mechanics

- Replaces them with **internal control standards** and audits
- Shifts focus from process transparency to control verification

Why This Is Controversial

- Commissioners lose visibility into “how” money moves
- Some boards rely on procedural detail for comfort
- Audits feel abstract compared to hands-on review

Cultural Shift

From **operational oversight** → **governance accountability**

7. Emergency Authority Concentrated in Executive Director

What Changed

- Executive Director authorized to act unilaterally in emergencies
- Board review occurs *after* the fact

Why This Is Controversial

- Vague definition of “emergency”
- Fear of scope creep
- Concern about decisions made without prior notice

Counterpoint

Legally sound and common—but politically sensitive.

8. Removal of Detailed Personnel Benefits From Board Policy

What Changed

- PTO, holidays, benefits, compensation structures removed or minimized
- Personnel chapter slimmed to standards and at-will employment

Why This Is Controversial

- Commissioners may fear loss of transparency
- Less visible employee benefits oversight
- Perceived distancing from workforce concerns

Highest-Risk Flashpoint Sections (If You Had to Pick 3)

1. **Commissioner communication bans (Sunshine Law chapter)**
2. **Limits on individual commissioner authority over staff**
3. **Standards of conduct with corrective measures**

These are the provisions **most likely to generate amendments, motions, or delayed adoption.**

Practical Tip for Board Adoption

Boards that successfully adopt manuals like this often:

- Adopt **chapters individually**
- Add **training or legal briefings** before adoption
- Include a **non-punitive intent statement** for civility standards
- Commit to a **6–12 month review period**

If you want, I can next:

- Mark which sections are **most likely to be amended**
- Suggest **softening language** without reducing legal protection
- Prepare **talking points for contentious board discussion**
- Create a **redline-style “hot issues” memo**

Just tell me what’s most helpful.

Provide your feedback on BizChat

Suggest softening controversial language
Create talking points for board meeting
Explain legal risks of commissioner bans

COMMISSIONER FRAZIER COMMENTS

SEBASTIAN INLET DISTRICT

ADMINISTRATIVE POLICY MANUAL

Adopted: _____, 2026

Resolution No.: _____



TABLE OF CONTENTS

- Chapter 1. [Enabling Legislation & Governance Structure](#)
- Chapter 2. [Uniform Special District Accountability Act Compliance](#)
- Chapter 3. [Administrative Authority & Board Procedures](#)
- Chapter 4. [Fiscal Procedures & Financial Controls](#)
- Chapter 5. [Procurement & Contracting](#)
- Chapter 6. [Personnel Policies](#)
- Chapter 7. [Public Records & Records Management](#)
- Chapter 8. [Ethics, Sunshine & Governance Compliance](#)
- Chapter 9. [Internal Controls & Audit Standards](#)
- Chapter 10. [Emergency Authority](#)
- Chapter 11. [Amendments](#)

APPENDIX

- Appendix A – Cash Management Policy – 4-13-22
 - Appendix B – Executive Director Spending Authority – Resolution No. 07.10.19-2
 - Appendix C – Travel Policy – Resolution No. 2005-1
 - Appendix D – District Public Records Request and Fee Schedule Procedures 3-13-24
-

CHAPTER 1

ENABLING LEGISLATION & GOVERNANCE STRUCTURE

1.1 Establishment

The Sebastian Inlet District (District) was created as an independent special taxing district by the Florida State Legislature through the passage of Chapter 7976, Laws of Florida, Special Acts of 1919 (“Enabling Legislation”), the Sebastian Inlet District was chartered to maintain the navigational channel between the Atlantic Ocean and the Indian River Lagoon. (include copy of charter in Appendix and reference in summary below)

1.2 Purpose and Authority

It shall be the duty of the Board of Commissioners of Sebastian Inlet District (District) to construct, improve, widen or deepen, and maintain an inlet between Indian River and the Atlantic Ocean. The powers ~~exercisable~~ exercised by the District, in addition to its charge to maintain the Sebastian Inlet, include environmental preservation and enhancement, ad valorem taxation, eminent domain, interlocal cooperation, acquisition of property, and the power to issue bonds. The District is authorized to conduct such programs and projects as it finds necessary or convenient for sediment bypassing (beach renourishment), erosion control, environmental protection, navigation, boating, recreation and public safety for the operation and maintenance of the inlet and the waters of the Atlantic Ocean and Indian River Lagoon adjacent thereto.

1.3 Governing Body

The District is governed by a five-member Board of Commissioners as provided in its Enabling Legislation with three (3) Brevard County seats and two (2) Indian River County seats. Property owners within the District's boundaries in Brevard and Indian River Counties can cast their vote for all eligible Sebastian Inlet District Commission seats during the general election held in November of each even-numbered year. The terms of the Board members shall be staggered, with three (3) Board members standing for election in one general election for a 4-year term, and two (2) Board members standing for election 2 years later at the general election for a 4-year term. Unless specified by Florida Statutes, approval of District policy, budget, contracts, etc., require a minimum of 3 Yay votes. Three members of the Board shall constitute quorum, with two affirmative votes required for business when only 3 members ~~present~~ are present. Commissioners act collectively as the governing body. Individual commissioners possess no independent administrative authority unless expressly authorized by Board action.

1.4 Officers (NEW? Or reference document)

~~The Board shall elect a Chair, Vice-Chair, and Secretary/Treasurer (may be combined combination). Officers serve two-year terms or until successors are elected.~~

~~The Commission shall elect officers from among their number, officers of this Commission shall be a Chair, a Vice-Chair, and a Secretary/ Treasurer. The position of Secretary and Treasurer may be combined and held by one Commissioner. Officers serve two-year terms or until successors are elected.~~

As the presiding officer of the Board, the Chair shall:

- At every meeting call the Board to order, call the roll on the appearance of a quorum, and proceed to the business of the Board
- Sign all ordinances enacted and resolutions adopted by the Board
- Authorize the placing of items on the Regular Agenda and the removal of items from the Consent Agenda
- Exercise the powers granted by these Rules and Policies to the Chair or to the presiding officer
- Present, or designate another Commissioner to present, all awards, resolutions and honors presented on behalf of the Board
- Perform such other duties as the Board may direct

The duties of the Vice-Chair shall include performance of all duties of the Chair, in the temporary absence, disability or conflict of the Chair.

The duties of the Secretary/Treasurer shall include the following:

- Recording the minutes of all meetings unless done by staff
- Providing notices for all meetings unless done by staff
- Custodial care of all funds and investments of the District
- Maintenance of financial records and a report thereon at each quarter unless provided by staff
- Such other financial duties as may be directed by the Commission

CHAPTER 2

UNIFORM SPECIAL DISTRICT ACCOUNTABILITY ACT COMPLIANCE

The District shall comply with Chapter 189.03, Florida Statutes. We should elaborate such as Jupiter and include copy in Appendix

CHAPTER 3

ADMINISTRATIVE AUTHORITY & BOARD PROCEDURES (BY LAWS?)

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3.1 Role of the Board

The Board:

- Governs, establishes policy, and adopts resolutions
- Annually adopts budget and millage rate
- Approves contracts
- Evaluates Provides direction to the Executive Director overseeing all operations of the District
- Oversees the preparation of Agenda and meeting materials

3.2 Role of the Executive Director

The Executive Director:

- Serves as chief administrative officer and shall be responsible for the general and day-to-day administration of the District, subject to the direction and authority of the Board
- Implements Board policy
- Develops, recommends, implements, administers, reviews and monitors the District's budget as approved by the Board
- Supervises all District staff and consultants
- Oversees operations, procurement, programs and projects, grants, and compliance
- Prepares agendas and meeting materials
- Serves as spokesperson for the District, attends public meetings, and works with the public to identify the needs and interests of the surrounding communities and to promote the District's interests and objectives

- Performs such other duties as may be required by the Board

All District operational direction flows through the Executive Director.

3.3 Board Meetings

- All meeting shall be open to the public
- Regular meetings: The Board meets on the 2nd Wednesday of each month. Meeting location and time alternate between Indian River and Brevard counties to better serve constituents residing within the District's boundaries in both counties. Public meetings are noticed in the local newspapers one week prior to the meeting and on the District website. Meeting agendas and packages are located on the District website (www.sitd.us)
- Workshops: As needed. Notice will be provided in the same manner as for regular meetings.
- Special meetings: As needed. Two days written notice of the time and purpose of a special meeting shall be given to all members, the news media, and will be posted (on website).
- Emergency meetings: Where there is an immediate danger to public health, safety, or welfare that requires immediate action, the Board may hold an emergency meeting. The Board must give notice by a procedure that is reasonable under the circumstances and necessary to protect the public interest.

3.4 Board Meeting Minutes

- **Statutory Authority**
 - Pursuant to **Section 286.011(2), Florida Statutes**, minutes of all meetings of the Board shall be promptly recorded and maintained as public records. [\(Appendix?\)](#)
- **Nature of Minutes**
 - Board minutes are intended to serve as an official summary record of actions taken by the Board. The purpose of Board minutes is to document official action of the Board as a body.
 - Minutes shall:
 - Identify the date, time, and location of the meeting
 - Identify Board members present and absent
 - Record motions, seconds, and vote outcomes

- Reflect official actions taken
- Provide a concise summary of discussion sufficient to reflect the substance of matters considered
- **Attribution of Individual Comments**
 - Florida law does not require detailed attribution of individual comments made during Board discussion
 - The District shall prepare summary-style minutes unless the Board formally directs otherwise by majority vote
 - Individual Board members may request that their vote be recorded, which shall be reflected in the minutes as required by law
- **Recording of Meetings**
 - Audio or video recordings, when made, are public records but do not replace the statutory requirement for written minutes

CHAPTER 4

FISCAL PROCEDURES & FINANCIAL CONTROLS

4.1 Budget Process

The Executive Director shall prepare a proposed annual budget and coordinate all TRIM requirements. Budget adoption shall occur through properly noticed public hearings.

4.2 Accounting System

The District shall maintain a standardized Chart of Accounts and utilize approved governmental accounting software. The District currently uses **QuickBooks Desktop**.

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4.3 Payment Authorization

- The payables are paid semi-monthly by the Contracts/Accounting Manager.
- All ACH payments and check payments are reviewed and approved by the Executive Director and one of the authorized Commissioners.
- Checks are signed by the Executive Director and one of the authorized Commissioners. Authorized check signers for the District include the Executive Director, the Commission Chair and the Commission Secretary/Treasurer.

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4.4 Banking and Investments

The District has a checking account and a money market account with PNC Bank. The checking account carries a balance of \$25K and the excess is “swept” into a money market account which accrues interest.

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District surplus funds shall be invested in accordance with Florida Statutes and the District’s adopted Cash Management Policy (Appendix A). The District currently utilizes Florida PRIME through the State Board of Administration (SBA). The opening of the Florida PRIME account was approved by the Board in October 2021.

Florida PRIME is a government investment pool that offers management by Federated Hermes. The Pool offers investors experienced, government-level liquidity management, conservative investment policies, an extensive governance framework, a Standard & Poor’s “AAAm” rating, full transparency, and best-in-class financial reporting. It serves over 850 users in Florida and is made up of approximately \$24.6 billion in public funds. The website is: <https://prime.sbafla.com>.

On April 01, 2022, the Commission authorized staff to conduct a monthly transfer of funds in excess of \$5 million dollars in the PNC Bank account to the Florida PRIME account. (Appendix A – Cash Management Policy).

4.5 Internal Controls

The District shall maintain:

- Monthly bank reconciliations
- Segregation of duties where feasible
- Annual independent/single audits
- Tiered approval for accounts payable (Executive Director and authorized Commissioner review and approval)

CHAPTER 5

PROCUREMENT & CONTRACTING

The District shall comply with all applicable procurement laws under Chapter 287, Florida Statutes, including competitive bidding requirements, statutory thresholds and internal procurement processes.

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Commented [If2]: Recommend including pertinent parts of referenced statutes if possible

The Executive Director may execute contracts up to a Board-approved spending threshold (\$10,000) without prior Board approval, subject to ratification at the next Board meeting. (Appendix B – Executive Director Spending Authority - Resolution No. 07.10.19-2)?????

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In the event of an emergency and consistent with the District Charter, the Board is authorized to spend a sum not to exceed \$15,000 [Section 16](#)). [\(f\) All purchasing and bidding shall be in accordance with the procedures used by the Brevard County Board of Commissioners.](#)

CHAPTER 6

PERSONNEL POLICIES

6.1 Employment Status

All employees are at-will unless otherwise specified by written contract.

6.2 Standards of Conduct

Employees shall maintain professional conduct and comply with all applicable ethics and workplace policies.

Harassment, discrimination, retaliation, and disruptive conduct are prohibited.

6.3 Travel & Reimbursement Policy

The District shall comply with the Travel Policy adopted by the Board on March 9, 2005. (Appendix C – District Travel Policy – Resolution No.2005-1).

The Travel Policy establishes procedures for authorization and reimbursement of travel expenses incurred by District employees and officials in the performance of official District business.

A. Transportation

- Travel shall be by the most efficient and economical means available
- Air travel shall be booked as far in advance as practical to obtain the lowest reasonable fare
- Use of a personal vehicle shall be reimbursed at the IRS standard mileage rate in effect at the time of travel. Tolls and parking fees will be reimbursed when documented

B. Lodging

- Lodging should be reserved in advance at the lowest reasonable rate.
- Florida sales tax exemption shall be requested when applicable.
- Travelers shall verify lodging charges at check-in and check-out.

C. Meal Expenses

- Meal reimbursements shall follow federal per diem rates (GSA M&IE)
- Alcoholic beverages and tobacco products are not reimbursable under any circumstances.

D. Per Diem Advances

Advance per diem payments are not permitted unless specifically authorized by Board policy.

E. Documentation & Reimbursement

- All travel reimbursement requests must be submitted within ten (10) business days of return.
- Reimbursement requests must include itemized receipts and proof of payment.
- Reimbursements are subject to review by the Executive Director and approval by the Board when required.

CHAPTER 7

PUBLIC RECORDS & RECORDS MANAGEMENT

7.1 Compliance with Chapter 119, Florida Statutes

The District complies with Chapter 119, Florida Statutes, and applicable public records retention schedules issued by the Florida Division of Library and Information Services.

The Executive Director, or his or her designee, shall serve as the Custodian of public records charged with the responsibility of maintaining public records.

Public records means all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.

7.2 District Public Records Request and Fee Schedule Procedures

In addition to Florida Statutes, all public records requests received orally and/or in writing shall follow the District Public Records Request and Fee Schedule Procedures adopted by the Board on March 13, 2024. (Appendix D).

The Executive Director must be informed of all public records requests received by telephone, email, letter, fax, or in person.

CHAPTER 8

ETHICS, SUNSHINE & GOVERNANCE COMPLIANCE

8.1 Commissioner Conduct & Professional Civility

A. Purpose

The Board of Commissioners affirms that effective governance requires professionalism, mutual respect, and adherence to ethical standards. This section establishes expectations for commissioner conduct to promote orderly meetings, protect staff from inappropriate interference, preserve public confidence in District leadership, and minimize District risk.

B. Standards of Professional Conduct

Commissioners shall:

- Treat fellow commissioners, staff, consultants, and members of the public with dignity and respect
- Refrain from personal attacks, disruptive behavior, or conduct that undermines orderly proceedings
- Avoid conduct that could reasonably be perceived as harassment, intimidation, or retaliation
- Respect the distinction between the branches of government: Legislative (Board role), Legal (Attorney role) and ~~Executive~~ Operational (Executive Director role)

C. Operation within Administrative Structure

Individual commissioners shall not:

- Direct or supervise staff outside Board action
- Demand operational changes outside Board action
- Conduct independent investigations without Board authorization
- Interfere with vendor, consultant, or stakeholder relationships outside Board action

All operational inquiries shall be directed to the Executive Director.

D. Meeting Decorum

The Chair is authorized to maintain decorum during meetings. Deliberations of the Board of Commissioners shall be conducted pursuant to Robert’s Rules of Order. The Chair shall exercise care that the right of each Commissioner to be heard is respected, and that the actions of the Board are clear. In controversial deliberations, strict adherence to Robert’s Rules of Order may be invoked by the Chair, or any Commissioner by raising a point of order. The latest published edition of “Robert’s Rules of Order” shall be the parliamentary authority for all matters of procedure.

E. Corrective Measures

If conduct concerns arise, the Board may address the matter through:

- Board discussion in open session
- Formal reminder of policy
- Referral to ethics training
- Other lawful corrective measures

This section is intended to reinforce professionalism and does not limit statutory remedies available under Florida law.

8.2 Board Member Communications Outside Public Meetings

A. Purpose

In recognition of the fact that the Board has no way of knowing what matters may or may not come before it for action and that matters relating to the Board and its powers, duties and areas of interest may come before the Board for action, the Board adopts a communication rule to prevent inadvertent violations of the Sunshine Law, limit potential liability of the District and commissioners, and ensure strict compliance with open government requirements.

B. Prohibited Communications

Pursuant to Florida's Sunshine Law, commissioners shall not email, text, message, call, or otherwise communicate with one another regarding any District business outside a duly noticed public meeting.

This prohibition applies regardless of whether the matter is:

- On ~~a current~~ the current agenda
- Anticipated for a future agenda
- Described as informational only
- Characterized by the communicating commissioner as not foreseeable for Board action

All ~~discussion~~ discussions of District business shall occur only during properly noticed public meetings.

C. Serial Communications Prohibited

Commissioners shall not engage in serial or "daisy chain" communications for the purpose of discussing District matters outside a public meeting.

D. Staff as Intermediaries Prohibited

Commissioners shall not use staff or consultants to convey positions, opinions, or preferences to other Commissioners outside public meetings.

E. Permitted Communications

Permitted communications include:

1. Administrative scheduling coordination not involving District business discussion
2. One-way informational distribution from the Executive Director
3. Communications during duly noticed public meetings
4. Communications unrelated to District business

District Business means any matter involving officials acts, transactions, or discussions that fall within the Board's governmental authority and decision-making responsibilities, including but not limited to operational matters, budget discussions, and policy development.

F. Social Media

Commissioners shall not engage in interactive discussions with one another concerning District business on social media or digital platforms outside public meetings.

G. Inadvertent Communications

If a Commissioner receives a District-related communication from another Commissioner outside a public meeting, the recipient shall refrain from responding and notify the Executive Director for retention of public records and may request legal counsel to provide an opinion.

CHAPTER 9

INTERNAL CONTROLS & AUDIT STANDARDS

9.1 Purpose

The District shall maintain a system of internal controls designed to safeguard public funds, ensure reliability of financial reporting, promote operational efficiency, and ensure compliance with applicable laws and regulations.

9.2 Control Environment

The Board and Executive Director shall establish a tone at the top emphasizing integrity, transparency, and accountability.

9.3 Segregation of Duties

To the extent practical given staffing levels, financial responsibilities shall be segregated to prevent any single individual from controlling authorization, custody, and recordkeeping functions.

9.4 Authorization & Approval Controls

- All contract authorizations require Board approval unless specifically delegated
- Contracts must be ~~executed~~carried out in accordance with adopted procurement policies
- All ACH payments and check payments are reviewed and approved by the Executive Director and one of the authorized Commissioners

- Opening or modifying District financial accounts and wire transfer authorizations shall be formally authorized by Board action

9.5 Reconciliations

- Monthly bank reconciliations shall be performed and reviewed.
- Investment statements shall be reconciled monthly.
- Variances between budget and actual expenditures shall be reported to the Board quarterly.

9.6 Physical & Digital Safeguards

The District shall maintain safeguards over:

- Check stock and financial instruments
- Online banking credentials
- Electronic accounting systems
- Sensitive personnel and legal records

9.7 Independent Audit

The District shall engage an independent certified public accountant annually in accordance with Chapter 218, Florida Statutes. Single Audits will be conducted when required. Annual audits shall be presented at a public meeting.

9.8 Fraud Reporting

Any suspected fraud, misuse of public funds, or financial irregularity shall be reported immediately to the Board Chair, Executive Director, and/or legal counsel.

CHAPTER 10

EMERGENCY AUTHORITY

In emergency circumstances threatening life, safety, or District property, the Executive Director may take necessary action consistent with Florida law. All emergency actions shall be reported to and ratified by the Board at the next public meeting.

CHAPTER 11

AMENDMENTS

This Administrative Policy Manual may be amended by resolution of the Board of Commissioners at a duly noticed public meeting.

BOARD ADOPTION RESOLUTION

RESOLUTION NO. _____

A RESOLUTION OF THE SEBASTIAN INLET DISTRICT ADOPTING AN ADMINISTRATIVE POLICY MANUAL; PROVIDING FOR IMPLEMENTATION; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Sebastian Inlet District is an independent special district of the State of Florida; and

WHEREAS, the Board of Commissioners finds it necessary and appropriate to adopt a comprehensive Administrative Policy Manual to provide structure, transparency, and compliance with applicable Florida law; and

WHEREAS, the Board desires to establish clear governance procedures, financial controls, personnel standards, procurement practices, public records compliance, and Sunshine Law safeguards;

THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE SEBASTIAN INLET TAX DISTRICT, AS THE GOVERNING BOARD OF THE SEBASTIAN INLET TAX DISTRICT:

Section 1. The Administrative Policy Manual attached hereto is hereby adopted.

Section 2. The Executive Director is authorized to implement and administer the Manual.

Section 3. This Resolution shall take effect immediately upon adoption.

DONE, ORDERED AND ADOPTED this ___ day of _____, 2026.

David Barney, Chairman

APPROVED AS TO FORM AND LEGAL SUFFICIENCY

Shawn L. Demers, Esq.

DRAFT