

**PROPOSED MINUTES**  
**PORT JERVIS COMMUNITY DEVELOPMENT AGENCY**  
**(PJCDA)**  
**MEETING MINUTES**  
**Wednesday, April 29, 2026**

**ROLL CALL:**

The PJCDA board met on Wednesday, April 29, 2026, at 134 Pike St., 2<sup>nd</sup> Floor, Port Jervis, NY 12771. The meeting called to order by Chairwoman, Kristin Trovei at 7:00 PM.

Per roll call, the following members were present:

Kristin Trovei, Chairwoman  
Jeffrey Rhoades, Secretary  
Michael Talmadge, Treasurer  
Jacqueline Dennison, Council Liaison  
Colin O’Connell, Member

Absent:

John Russell, Vice - Chairman

Also present were:

Matthew Witherow, Esq.  
Valerie Maginsky, Executive Director  
Nora Goetz, Section 8 Administrator  
Shannon Howard, Program Assistant

Members of the Public:

No one from the public was present

**READING/APPROVAL OF MINUTES**

The March 25, 2026, meeting minutes were reviewed, and they were approved:

Motion: Mr. Rhoades                      2<sup>nd</sup>: Ms. Dennison                      All Others in Favor

**FINANCIALS**

**A. Administrative Bills**

E.D. Maginsky reviewed the estimated administrative bills in the amount of \$34,490.86. The current administrative balance is \$ 970,255.58. A motion was made to approve payment of the bills in the estimated amount of \$34,490.86.

Motion: Mr. Talmadge                      2<sup>nd</sup>: Mr. Rhoades                      All Others in Favor

**B. Monthly Financial Report**

All bills received have been paid accordingly.

Motion: Mr. Talmadge                      2<sup>nd</sup>: Mr. Rhoades                      All Others in Favor

**SECTION 8 AND DIRECTOR’S REPORT**

Administrator Goetz presented the April Section 8 report for review and comment, and it was approved. Leased HCV: 190, Leased Mainstream: 31. HAP, Mainstream, FSS Payments: \$200,322.00. Total Admin received: \$29,736.00. Eligible waitlist: 269 families. The waitlist opening concluded on March 13, 2026. Data entry has begun. Over half of the 400 applications have been entered. There are eight available vouchers and applicants will be contacted once data entry is complete. The agency is exploring funding opportunities for the Melania Trump Foster Youth Program, which serves young adults aging out of foster care.

Motion: Mr. Talmadge                      2<sup>nd</sup>: Ms. O’Connell                      All Others in Favor

E.D. Maginsky presented the Director's March report which included Grant, Project, Communications and Administrative updates. Approved:

Motion: Mr. Talmadge

2<sup>nd</sup>: Mr. Rhoades

All Others in Favor

### **COMMUNICATIONS:**

4/7/26 – Pathways Meeting

4/9/26 – Syracuse Center of Excellence – Remotely Attended New USDA Rules and Regulations Session

4/10/26 – Attended a Meeting with KDC/One and ESD. Updated Contacts.

4/15/26 – ABG Meeting at City Winery in Walden. Speakers included Regional Representatives from NYS, DEC, NYS DOT and the Orange County DOH

4/16/26 – Attended the Regional Mayor's Meeting

4/27/26 – Port Jervis Department Head Meeting

### **OLD BUSINESS:**

FY 2014 Housing NOFA - AHC – communications with AHC regarding a closing continue.

NYS DEC WQIP - Land Acquisition – NYS Funding - Project 2 - Latini: April 2026 - The legal filings regarding Project 1 and Project 2 (Deerpark and Latini) have been received. Invoices for PJCDA and OCLT administrative expenses are being invoiced. Reimbursement requests are being calculated. All expenses must be completed before **June 1, 2026**, additional paperwork may follow. **(Correction – VM 4/30/26)**

DRI-Jersey Ave - Project is progressing through design. Coordination efforts have been made between MHE and CPJ Shade Tree Commission for tree selection. The goal is to have project bid available by the beginning of July.

DRI - Riverside Park - an RFP is in process as is the engagement of an engineer under professional services to oversee the process. A resolution to that end was approved by the Port Jervis Common Council on April 27, 2026.

DRI - Small Projects Fund - The initial introduction and application package has been sent for review and commentary. A scoring committee will be required.

Administration: The DRI site tour with NYS ESD and NYS DOS was held on 4/1/26. A monthly meeting has been established with NYS DOS.

RISC Technical Assistance Grants – April 2026 – Planning meetings continue with NYS HCR and Ramboll. The preliminary engineering report estimates a \$17.1 million project to address the dam, raise the sidewalls and replace the water connections under the spillway. A FEMA BRICS grant is now open with an application due date of June 22, 2026, with a 75% grant and 25% match. Quarterly reports have been submitted. Reimbursement requests are in process.

FEMA Assistance to Firefighters Grant (AFG) – Federal – preparing reimbursement request .

NYS HCR CDBG PI 2024 –WFP - Advertising for a combined RFP for a contractor and equipment was extended. The bid opening date is May 4th with an award to follow at the following council meeting of May 11th.

NYS ESD – County Infrastructure Grant - WFP- Questions regarding acceptable progress and utilizing the current CDBG funding as a match were confirmed by NYS ESD.

Federal Railroad Elimination Grant (RCE) – Pedestrian crossing at Fowler and 4 -A reintroduction meeting with Metro-North Railroad was held on 4/29/26. Follow-up activity continues

2025 CFA – NYS CFA DOS Brownfield Opportunity Area (BOA) – Contracts are in process.

2025-2026 NYS DHSES – PJFD Recruitment & Retention The quarterly report was submitted. Equipment planning is in process.

Community Project Funding (CPF) – Federal Funding - Congressman Patrick K. Ryan — March 2026 - \$3M application for new DPW Garage – Congressman Ryan has nominated this project for the City of Port Jervis for competitive consideration under the Fiscal Year 2027 Community Project Funding for a request of \$1,650,000 to the House Appropriations Committee.

PJFD – Centralized Firehouse Project – of the two firms interviewed, site visits were held at the Beacon and Peekskill station (Ken Gale Emergency Services Market), and Norwalk, Ct (H2M). Evaluations are in process.

**NEW BUSINESS:**

Infrastructure Grant – (ref: RISC2) – \$3M grant application to increase the diameter of the storm water pipes on Barcelow and Owen Streets. -The grant submission deadline has been moved to 3:00 p.m. June 1, 2026.

Pro-Housing Communities Certification – Assistant Building Official Powrie is working on the annual report which is due by June 15, 2026.

A resolution establishing the Executive Director as the agency’s Procurement Officer and the Section 8 Administer with Chairperson oversight was approved (Establishment of Procurement Officer).

Motion: Mr. Rhoades                      2<sup>nd</sup>: Mr. O’Connell                      All Others in Favor

As an amendment to the current procurement policy, the resolution, “Anti – Collusion Policy and Procedure with Non – Collusion and Confidentiality Certification,” during agency bidding, was approved.

Motion: Mr. Talmadge                      2<sup>nd</sup>: Mr. Rhoades                      All Others in Favor

As an amendment to the current procurement policy, the resolution, “Comprehensive Procurement Integrity and Unauthorized Contact Policy” was approved forming a path for notification, investigation and resulting action regarding unauthorized contact during a bidding process.

Motion: Mr. Talmadge                      2<sup>nd</sup>: Mr. O’Connell                      All Others in Favor

**PUBLIC COMMENT:**

None Present

**EXECUTIVE SESSION:**

A motion was made to go into Executive Session at 7:34 PM.

Motion: Mr. Rhoades                      2<sup>nd</sup>: Mr. O’Connell                      All Others in Favor

A motion was made to come out of Executive Session at 7:48 PM.

Motion: Mr. Rhoades                      2<sup>nd</sup>: Mr. O’Connell                      All Others in Favor

As a result of Executive Session:

Annual Financial Reports (PARIS) – PKF O’Connor Davies will complete nine reports for \$10,800.00.

Motion: Mr. O’Connell                      2<sup>nd</sup>: Ms. Dennison                      All Others in Favor

**NEXT MEETING:**

The next meeting of the PJCDA Board of Directors is currently scheduled for May 27, 2026, at 7:00 p.m. at the Youth and Community Center, 2<sup>nd</sup> Floor, 134 Pike St., Port Jervis, NY 12771. With prior notification to the PJCDA by telephone: 845-858-4024, or email to: Director@PJCDA.org, ADA access is available.

**ADJOURNMENT**

There being no further business in front of the Board, the meeting was adjourned at 7:49 p.m.

Motion: Mr. Rhoades                      2<sup>nd</sup>: Ms. Dennison                      All Others in Favor

**RESOLUTION OF THE PORT JERVIS COMMUNITY DEVELOPMENT AGENCY  
(PJCDA), PORT JERVIS, ORANGE COUNTY, NEW YORK**

RE: PJCDA – Procurement Officer

WHEREAS, the Port Jervis Community Development Agency has a procurement policy; and

WHEREAS, the Agency is required to identify a Procurement Officer,

NOW, THEREFORE, BE IT RESOLVED THAT the Port Jervis Community Development Agency's Procurement Officer is hereby designated to be the Executive Director, and in the instance the Executive Director is absent and procurement cannot be delayed, with notification to the Board of Director's chairperson, the agency's Section 8 Administrator has the authority to perform the duties of the Procurement Officer

MOTION BY: Mr. Rhoades

SECONDED BY: Mr. O'Connell

AYES: 5

NAYS: 0

ABSTENTIONS: 0

Dated: April 29, 2026

**RESOLUTION OF THE PORT JERVIS COMMUNITY DEVELOPMENT AGENCY  
(PJCDA), PORT JERVIS, ORANGE COUNTY, NEW YORK**

RE: PJCDA – Procurement Policy Amendment – Anti-Collusion Policy and Procedure

WHEREAS, the Port Jervis Community Development Agency has a procurement policy; and

WHEREAS, the Agency is required to have an Anti-Collusion Policy and procedure with which to implement and track the procedure; and

WHEREAS, the Anti-Collusion Policy and procedure is internally documented via a Procurement Staff Non-Collusion and Confidentiality Certification, a required internal control document which will be retained in the procurement file:

NOW, THEREFORE, BE IT RESOLVED THAT the Port Jervis Community Development Agency Board of Directors hereby approve the attached Anti-Collusion Policy and Procedure along with the accompanying Procurement Staff Non-Collusion and Confidentiality Certification as an amendment to the agency’s procurement policy.

MOTION BY: Mr. Talmadge

SECONDED BY: Mr. Rhoades

AYES: 5

NAYS: 0

ABSTENTIONS: 0

Dated: April 29, 2026

## **Port Jervis Community Development Agency**

### **ANTI-COLLUSION IN BIDDING POLICY**

*(For New York State Public Benefit Agencies)*

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#### **1. Purpose**

The purpose of this Anti-Collusion in Bidding Policy is to ensure that all procurements conducted by the Agency are performed in a manner that promotes full and open competition, prevents anti-competitive practices, and complies with all applicable laws, including but not limited to New York General Municipal Law §103-d and applicable guidance from the New York State Authorities Budget Office.

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#### **2. Policy Statement**

It is the policy of the Agency that all bids, proposals, and quotations submitted in response to any solicitation shall be:

- Independently arrived at;
- Free from collusion, consultation, communication, or agreement with any other bidder or competitor;
- Submitted in good faith to secure a contract through fair and open competition.

Any evidence or suspicion of collusion shall result in immediate review and may lead to disqualification, contract termination, and referral to appropriate enforcement authorities.

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#### **3. Applicability**

This policy applies to:

- All vendors, contractors, subcontractors, and consultants;
- All procurement methods, including Invitations for Bids (IFB), Requests for Proposals (RFP), Requests for Qualifications (RFQ), informal procurements, and all procurements for professional services, regardless of whether award is based on price, qualifications, or best value;

- All Agency staff, officers, board members, and evaluation committee participants involved in procurement activities.
- 

#### **4. Required Anti-Collusion Certification**

Every bid or proposal must include a signed Anti-Collusion Certification affirming that:

1. Pricing and proposal content have been independently developed;
2. No collusion, coordination, or agreement exists with any competitor;
3. The submission has not been disclosed prior to opening or award;
4. No improper influence or financial interest involving Agency personnel exists.

Failure to include this certification shall render the submission non-responsive.

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#### **5. Prohibited Conduct**

The following actions are strictly prohibited:

##### **A. General Prohibitions**

- Price fixing, bid rigging, or market allocation;
- Bid rotation or suppression;
- Sharing confidential pricing or proposal information;
- Collusive subcontracting arrangements;
- Violations of antitrust laws, including the Sherman Antitrust Act.

##### **B. Professional Services Procurement Prohibitions**

In procurements for professional services, prohibited conduct also includes:

- Coordination or standardization of technical proposals or qualifications;
- Submission of intentionally non-competitive or “cover” proposals;
- Undisclosed relationships or affiliations that may influence evaluation scoring;
- Attempts to improperly influence evaluation committee members or the selection process;

- Any action that undermines the integrity of qualifications-based or best-value selection.
- 

## **6. Review and Enforcement**

The Agency shall:

- Review all submissions for indicators of collusion, including similarities in pricing, formatting, authorship, or structure;
- Require written clarification of irregularities;
- Document findings in the procurement file.

Where collusion is suspected, the Agency may:

- Reject the affected submission(s);
  - Suspend or debar the vendor;
  - Terminate any resulting contract for cause;
  - Refer the matter to the New York State Office of the Attorney General or other appropriate authorities.
- 

## **7. Staff Responsibilities**

All personnel involved in procurement shall:

- Maintain strict confidentiality of all procurement information;
  - Avoid any communication that could provide an unfair competitive advantage;
  - Disclose any actual or perceived conflicts of interest;
  - Report suspected collusion or unethical conduct immediately.
- 

## **8. Recordkeeping**

The Agency shall maintain a complete procurement record, including:

- All solicitations, bids, and proposals;
- Anti-collusion certifications;

- Evaluation materials and scoring documentation;
- Responsibility determinations;
- Documentation of irregularities and resolutions.

Records shall be retained in accordance with applicable retention requirements and made available for audit.

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## **9. Remedies and Penalties**

Violations of this policy may result in:

- Disqualification from procurement;
  - Contract termination;
  - Suspension or debarment;
  - Civil and/or criminal penalties under applicable law.
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## **10. Incorporation into Procurement Documents**

This policy shall be:

- Incorporated into all solicitations and procurement documents;
  - Included in all bid and proposal packages;
  - A condition of contract award and execution.
- 

## **11. Best Practice Enhancements (Mandatory for Federally-Assisted and High-Risk Procurements)**

### **A. Vendor Responsibility and Integrity Review**

All vendors shall undergo a responsibility review consistent with New York State standards, including:

- Completion of a Vendor Responsibility Questionnaire aligned with the New York State Office of the State Comptroller VendRep system;
- Disclosure of legal actions, debarments, or prior contract issues;

- Certification of compliance with applicable laws.

The Agency reserves the right to determine vendor responsibility.

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## **B. Conflict of Interest Disclosure and Certification**

All vendors and procurement participants shall:

- Disclose actual or potential conflicts;
- Certify absence of improper relationships;
- Comply with ethics requirements under New York Public Officers Law Article 18.

Failure to disclose may result in disqualification or disciplinary action.

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## **C. Procurement Integrity and Ethics Training**

All procurement personnel shall:

- Complete periodic ethics and anti-collusion training;
- Be trained to identify red flags of collusion or fraud;
- Acknowledge this policy in writing.

Training shall occur at least annually or prior to major procurements.

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## **D. Federal Funding Compliance Overlay**

For federally funded procurements, the Agency shall:

- Comply with 2 CFR Part 200;
  - Ensure full and open competition;
  - Perform and document cost/price analysis;
  - Include all required federal contract provisions;
  - Maintain documentation sufficient for audit review.
-

## **E. Enhanced Audit Trail and Documentation Controls**

The Agency shall maintain a complete audit trail including:

- Procurement advertisements;
  - All submissions and certifications;
  - Evaluation and scoring records;
  - Award justifications;
  - Documentation of any irregularities and corrective actions.
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## **12. Effective Date**

This policy shall take effect immediately upon adoption by resolution of the Board of the Agency and shall apply to all procurements issued thereafter.

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**Port Jervis Community Development Agency**

**Board of Directors' Adoption on** April 29, 2026 **(Date)**

# Port Jervis Community Development Agency

## PROCUREMENT STAFF NON-COLLUSION & CONFIDENTIALITY CERTIFICATION

*(Required Internal Control Document – To Be Retained in Procurement File)*

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### Procurement Information

Corporation Name: \_\_\_\_\_

Solicitation Title: \_\_\_\_\_

Solicitation Number: \_\_\_\_\_

Procurement Type (IFB/RFP/RFQ): \_\_\_\_\_

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### Staff / Committee Member Information

Name: \_\_\_\_\_

Title/Role: \_\_\_\_\_

Department/Organization: \_\_\_\_\_

Email: \_\_\_\_\_

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### CERTIFICATION

I, the undersigned, certify that I am participating in the above-referenced procurement process and acknowledge my responsibilities to ensure fairness, integrity, and compliance with applicable laws, policies, and ethical standards.

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#### 1. Non-Collusion and Independence

I certify that:

- I have not participated in, and will not participate in, any collusive activity with any bidder, proposer, consultant, or other party;
- I have not shared, and will not share, any non-public procurement information with any unauthorized person;
- I will perform my duties independently, objectively, and without bias or improper influence.

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## **2. Confidentiality of Procurement Information**

I acknowledge that all procurement-related materials, including but not limited to:

- Bids, proposals, qualifications, and pricing information;
- Evaluation criteria, scoring sheets, and internal deliberations;
- Communications and clarifications with respondents;

are confidential and shall not be disclosed to any person outside the authorized procurement process, except as required by law.

I understand that unauthorized disclosure may compromise the integrity of the procurement and may violate applicable laws and policies.

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## **3. Conflict of Interest Disclosure**

I certify that:

- I have no actual or apparent conflict of interest related to any bidder, proposer, or subcontractor;
- I have no financial, professional, or personal relationship that could impair or appear to impair my impartiality;
- I will immediately disclose in writing any potential or actual conflict that arises during the procurement process.

I acknowledge my obligations under New York Public Officers Law Article 18.

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## **4. Prohibition on Improper Communications**

I agree that:

- I will not engage in any unauthorized communication with bidders or proposers;
  - All communications with respondents shall be conducted only through the designated procurement contact;
  - I will not provide any respondent with an unfair competitive advantage.
-

## **5. Evaluation Integrity (If Applicable)**

If serving as an evaluator, I certify that:

- I will review and score submissions solely based on the published evaluation criteria;
  - I will not consider outside information, personal preferences, or undisclosed factors;
  - I will not discuss evaluations outside of official evaluation meetings or authorized communications.
- 

## **6. Federal and State Compliance (If Applicable)**

For procurements funded in whole or in part with federal funds, I acknowledge and agree to comply with applicable requirements, including:

- Full and open competition under 2 CFR Part 200;
  - Prohibition on conflicts of interest and organizational bias;
  - Maintenance of proper documentation for audit purposes.
- 

## **7. Acknowledgment of Responsibilities and Penalties**

I understand that:

- This certification is a condition of participation in the procurement process;
  - Violation of these requirements may result in removal from the procurement, disciplinary action, referral to oversight authorities, and/or other legal consequences.
-

## CERTIFICATION AND SIGNATURE

I certify that I have read, understand, and agree to comply with the requirements stated above.

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**Signature:** \_\_\_\_\_

**Name (Print):** \_\_\_\_\_

**Title:** \_\_\_\_\_

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

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## INSTRUCTIONS

- This form must be completed and signed **prior to accessing proposals or participating in evaluation activities.**
  - A separate certification is required for **each procurement.**
  - Completed forms shall be retained in the official procurement file.
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**RESOLUTION OF THE PORT JERVIS COMMUNITY DEVELOPMENT AGENCY  
(PJCDA), PORT JERVIS, ORANGE COUNTY, NEW YORK**

RE: PJCDA – Procurement Policy Amendment – Adoption of a Comprehensive Procurement Integrity and Unauthorized Contact Policy

WHEREAS, the Port Jervis Community Development Agency has a procurement policy; and

WHEREAS, the Agency is required to have a Comprehensive Procurement Integrity and Unauthorized Contact Policy;

NOW, THEREFORE, BE IT RESOLVED THAT the Port Jervis Community Development Agency Board of Directors hereby approves the attached Comprehensive Procurement Integrity and Unauthorized Contact Policy as an amendment to the agency’s procurement policy.

MOTION BY: Mr. Talmadge

SECONDED BY: Mr. O'Connell

AYES: 5

NAYS: 0

ABSTENTIONS: 0

Dated: April 29, 2026

# Port Jervis Community Development Agency

## PROCUREMENT INTEGRITY & UNAUTHORIZED CONTACT POLICY

*(For New York State Public Benefit Corporations)*

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### 1. Purpose

The purpose of this policy is to preserve the integrity, fairness, and transparency of all procurement activities by:

- Preventing improper influence, bias, or unfair competitive advantage;
- Establishing clear rules governing communications during procurements;
- Defining procedures for identifying, reviewing, and resolving unauthorized contact.

This policy supports compliance with applicable laws and standards, including New York General Municipal Law §103, New York General Municipal Law §103-d, and, where applicable, 2 CFR Part 200.

### 2. Policy Statement

All procurements shall be conducted in a manner that ensures:

- Full and open competition;
- Equal access to information for all respondents;
- Strict control of communications between the Corporation and vendors.

Unauthorized contact is strictly prohibited and shall be reviewed, documented, and addressed in accordance with this policy.

### 3. Definitions

#### A. Authorized Contact

The individual formally designated in the solicitation as the sole point of contact for all vendor communications.

#### B. Unauthorized Contact

Any communication, direct or indirect, between a vendor (or its representatives) and any Corporation officer, employee, board member, or agent **other than the authorized contact**, regarding a procurement.

## **C. Procurement Integrity**

The assurance that procurement decisions are made impartially, based solely on established criteria, and free from undue influence.

## **4. Applicability**

This policy applies to:

- All procurement methods (IFB, RFP, RFQ, informal procurements);
- All Corporation personnel, including staff, board members, consultants, and evaluation committee members;
- All vendors, proposers, contractors, and subcontractors;
- All procurements, including professional services.

## **5. Communication Protocol**

### **A. Single Point of Contact Rule**

All vendor communications shall be directed exclusively to the designated Authorized Contact.

### **B. Prohibited Communications**

Vendors shall not:

- Contact evaluation committee members, board members, or other staff regarding the procurement;
- Seek non-public information or guidance;
- Attempt to influence the outcome of the procurement.

### **C. Official Responses**

All substantive responses to vendor inquiries shall be:

- Provided in writing;
- Distributed to all potential respondents via addendum where appropriate.

## **6. Identification of Unauthorized Contact**

Unauthorized contact may be identified through:

- Self-reporting by staff or vendors;

- Review of communications (emails, calls, meetings);
- Complaints or third-party reports;
- Inconsistencies or irregularities in proposals.

All suspected unauthorized contact shall be reported immediately to the Procurement Officer or Compliance Officer.

## **7. Investigation Procedures**

Upon identification of a potential unauthorized contact, the Corporation shall take the following steps:

### **Step 1 — Immediate Documentation**

Record:

- Date, time, and method of contact;
- Individuals involved;
- Summary of communication.

### **Step 2 — Evidence Preservation**

Collect and retain:

- Emails, call logs, text messages;
- Written statements from involved personnel;
- Any relevant supporting documentation.

### **Step 3 — Preliminary Review**

Assess:

- Nature and intent of the contact;
- Whether any non-public or sensitive information was shared;
- Whether the contact could influence the procurement outcome.

### **Step 4 — Impact Assessment**

Determine whether the contact:

- Provided a competitive advantage;
- Compromised confidentiality;

- Affected evaluation integrity;
- Created an appearance of impropriety.

### **Step 5 — Determination**

Classify the incident as:

- **Non-Material** (no impact on competition);
- **Moderate Risk** (attempted or limited impact);
- **Material Violation** (actual or likely impact on fairness).

### **Step 6 — Corrective Action**

Based on the determination, the Corporation may:

- Take no action (with documentation);
- Issue a written warning to the vendor;
- Require reaffirmation of staff certifications;
- Remove or replace affected evaluators;
- Disqualify the vendor;
- Cancel and re-solicit the procurement;
- Refer the matter to legal counsel or the New York State Office of the Attorney General if warranted.

### **Step 7 — Documentation**

Prepare a **Procurement Integrity Memorandum** summarizing:

- Incident details;
- Findings and analysis;
- Determination and rationale;
- Corrective actions taken.

This memorandum shall be retained in the procurement file.

## **8. Staff Responsibilities**

All Corporation personnel shall:

- Adhere to communication restrictions;
- Maintain confidentiality of procurement information;
- Disclose any unauthorized contact immediately;
- Cooperate fully in any investigation.

Failure to comply may result in disciplinary action.

## **9. Vendor Responsibilities**

All vendors shall:

- Comply with all communication restrictions;
- Submit inquiries only through the Authorized Contact;
- Avoid any attempt to influence procurement personnel.

Violation may result in disqualification or other penalties.

## **10. Remedies and Enforcement**

Violations of this policy may result in:

- Disqualification from the procurement;
- Termination of contract;
- Suspension or debarment;
- Referral for civil or criminal enforcement under applicable laws, including antitrust statutes.

## **11. Recordkeeping**

All documentation related to unauthorized contact and investigations shall be:

- Maintained in the official procurement file;
- Available for audit and review;
- Retained in accordance with applicable records retention policies.

## **12. Training and Implementation**

The Corporation shall:

- Provide periodic training on procurement integrity and unauthorized contact controls;

- Require acknowledgment of this policy by all procurement participants;
- Incorporate this policy into all solicitation documents.

### **13. Effective Date**

This policy shall take effect upon adoption by resolution of the Board and shall apply to all procurements issued thereafter.

### **Port Jervis Community Development Agency**

**Board of Directors' Adoption on** April 29, 2026 **(Date)**