

Agenda
GOVERNANCE COMMITTEE MEETING
July 14, 2023 at 8:00 a.m.
Watershed Education Center (Vitale Park)
Lakeville, NY 14480

- 1. Review and Discussion of updated Service Unit Policy and Personnel Policies**
 - **Service Unit Policy**
 - **Policy on the Right of Employees to Express Breast Milk**
 - **Workplace Violence Prevention Policy and Assessments**
 - **Post Issuance Compliance Policy**

Next Meeting: Wednesday, July 26, 2023 @ 8 am

PURPOSE

The following Service Unit Policy, along with the LCWSA's Water and Sewer Use Rules & Regulations are considered the contract between the Livingston County Water and Sewer Authority Board, doing business as the Livingston County Water and Sewer Authority (LCWSA), and every person, business, owner, occupant, or customer who uses water, sewer or services (hereafter "Consumer") provided by the LCWSA.

SCOPE

This policy applies to any Consumer utilizing water and sewer service from the LCWSA shall be bound by the provisions of the Service Unit Policy and Water and Sewer Rules and Regulations, as from time to time amended by the LCWSA Board.

POLICY

I. Definitions

Multiple-Family Residential Parcel – A multiple-family residential parcel is any parcel within the Service Area (as defined below) which is connected to the Water System and/or Sewer System (both as defined below) which contains more than one dwelling unit which have separate living quarters with separate plumbing, kitchen, and toilet facilities, capable of housing more than one person living separately in each dwelling unit. Examples of a multiple-family residential parcel shall include but are not limited to a home with an apartment, apartment house or complex, a mobile/manufactured home park, whether occupied on a seasonal, part time or yearly basis.

Non-Residential Parcel – A non-residential parcel is any parcel within the Service Area which is connected to the Water System and/or Sewer System which does not meet the definition of a Residential Parcel (as defined below) or Multiple-Family Residential Parcel which may or may not have plumbing facilities and shall include any use not otherwise defined herein. Examples of a Non-Residential Parcel shall include, but not be limited to an institution, commercial business, industrial business, agricultural business, or a vacant tax parcel with service (such as a vacant lot with a yard hydrant).

Residential Parcel – A residential parcel is any parcel within the Service Area which is connected to the Water System and/or Sewer System which is a dwelling unit containing a single living quarter with plumbing, kitchen, and toilet facilities, capable of housing one or more persons. Examples of a residential parcel shall include but are not limited to a home, mobile/manufactured home, apartment, whether occupied on a seasonal, part time or yearly basis.

Service Area – That area within Livingston County, New York that the LCWSA owns or operates water and/or sewer distribution, collection or treatment facilities and provides potable drinking water and/or sewer treatment services to Consumers.

Service Unit – A billing designation assigned to each Consumer that is connected to a Water System and/or Sewer System operated by the LCWSA. Such designation will be used to determine the amount each consumer pays for Water Service and/or Sewer Service provided to it by the LCWSA. Such Service Units will be

independently assigned for both Water Service and Sewer Service and the number of Service Units may not be the same for Water Service as it is for Sewer Service.

Sewage – A combination of the water-carried wastes from residences, business buildings, institutions, and industrial establishments, and such ground, surface, and storm water as may be inadvertently present. The admixture of sewage, as defined above, with industrial wastes and other wastes shall also be considered "sewage", within the meaning of this definition.

Sewer Service - A connection from a single dwelling unit in a Residential Parcel or Multiple-Family Residential Parcel or a single connection from a Non-Residential Parcel or Seasonal or Recreational Parcel to a Sewer System for purposes the collection, treatment or disposal of sewer, industrial waste, and other wastes generated by such Residential Parcel, Multiple-Family Residential Parcel, Non-Residential Parcel or Seasonal or Recreational Parcel.

Sewer System – All sewer pipes and other appurtenances which are used or useful in whole or in part in connection with the collection, treatment or disposal of sewer, industrial waste, and other wastes and which are maintained, owned or operated by the Livingston County Water and Sewer Authority, including sewage pumping stations and sewage treatment and disposal works.

Water Connection – Any piping system, which can extract water from a water main.

Water/Sewer Main – Any piping system through which publicly supplied water is transported or sewage is conveyed.

Water Service – A connection from a single dwelling unit in a Residential Parcel or Multiple-Family Residential Parcel or a single connection from a Non-Residential Parcel or Seasonal or Recreational Parcel to a Water Main or other component of the Water System that is intended to and does provide potable drinking water to such Residential Parcel, Multiple-Family Residential Parcel, Non-Residential Parcel or Seasonal or Recreational Parcel.

Water System – All water pipes, water mains and other appurtenances which are used or useful in whole or in part in connection with the collection, storage, treatment or distribution of potable drinking water and which are maintained, owned or operated by the Livingston County Water and Sewer Authority.

II. Service Unit Assignment

1. **Service Unit assignment:** Service units for each Consumer shall be determined by the size and type of Water Service and/or Sewer Service connections each parcel has to the Water System and/or Sewer System.
2. **Residential Parcel:** One Service Unit shall be assigned for each Water Service and/or Sewer Service connected, plus one additional Service Unit shall be assigned for each Water Service and/or Sewer Service connection in excess of one.
 - a. Each single-family residential dwelling unit shall be considered to be one Service Unit and will be provided with a 5/8" x 3/4" service and water meter. When a single-family residential dwelling has a meter larger than 5/8" x 3/4" the unit assignment for the larger meter will be applied based on the Table in section 3.5. Included in this category will be single-family homes, individual apartments and manufactured homes or mobile homes that are not located within an apartment building, multi-family home or manufactured home community/park or mobile home community/park.

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- b. Multiple single-family dwelling units on the same parcel of land will each be considered as an individual Service Unit and may be required to have an individual water meter, provided they each have frontage to the public right-of-way and public water main.
 3. **Multiple-family Residential Parcel:** One Service Unit shall be assigned for each Water Service provided for each dwelling unit or separate living quarter, plus one Service Unit for each sewer connection per separate dwelling unit or separate living quarters.
 - a. Multiple dwelling units within a single building located on the same parcel of land, including apartment buildings with multiple apartments and manufactured homes or mobile homes located within a community or park of manufactured or mobile homes, will be served by one appropriately sized master meter serving all dwelling units on such parcel. Each dwelling unit on such parcel will be considered as an individual Service Unit and the parcel upon which such multiple dwelling units exist will be charged based on the cumulative number of Service Units located on such parcel.
 4. **Non-residential Parcel:** The number of Service Units assigned for Water Service to a Non-Residential Parcels will be based on water meter size. The methods described in the American Water Works Association (AWWA) Manual of Water Supply Practices (M22) will be the standard for determining meter sizes with non-residential parcels.
 - a. Any Non-Residential Customer shall submit for review by LCWSA or its designee, an analysis prepared by a professional engineer licensed in New York State, which supports the meter size requested by the customer. The analysis shall describe the bases of design and state that the method used is consistent with AWWA M22. Non-residential uses, which may include but are not limited to, recreational, educational, commercial, and agricultural uses and/or facilities will be assigned a number of service units based on the size of the water meter provided for by an M22 analysis.
 - b. LCWSA reserves the right to determine the appropriate number of Service Units assigned to each parcel.
 - c. The number of Service Units assigned for Sewer Service to Non-Residential Parcels may be based on water meter size. However, the LCWSA reserves the right to assign additional Service Units to Non-Residential Parcels based upon the specific strength, characteristics and flow of Sewage produced by a Non-Residential Parcel and its introduction into the Sewer System. At the request of the LCWSA, any Non-Residential Customer shall submit for review by LCWSA or its designee, an analysis prepared by a professional engineer licensed in New York State, which discloses the anticipated chemical makeup, quantity and frequency of its discharge into the LCWSA Sewer System. Should the LCWSA require review or analysis of such information by its own engineers, the cost of such review shall be borne by the Non-Residential Parcel owner and may be required to be paid prior to such review being completed.
 5. **Recreational and/or Campground Parcel:** Service Unit assignments for Water Service and/or Sewer Service shall be based on meter size when only one service connection is utilized for the entire parcel.

6. **Unit Charges:** Service Units for Water Service and Sewer Service charges shall be billed quarterly based on the following water meter sizes:

Table 3.5	
<u>Meter Size</u>	<u>Number of Service Units</u>
3/4"	1.0 unit
1"	1.5 units
1 ½"	3.0 units
2"	5.0 units
3"	11.0 units
4"	20.0 units
6"	40.0 units
8"	80.0 units

- a. Seasonal or non-continuous occupancy of a dwelling unit, other than parcel identified as seasonal and recreational parcels, will not be taken into consideration when determining what constitutes a service unit.
 - b. Any metered facility will be considered as a minimum of one Service Unit.
7. **Capital and Debt Charges:** Capital and debt charges assigned by LCWSA shall be based upon the determination of the number of Service Units assigned to various parcels in the Service Area that are or may be connected to the Water System and/or Sewer System.
8. **Sewage From Nonmetered Source :** In the event that the owner of a lot, parcel of land, building or other premises discharging Sewage, water or other liquids into a Sewer System, either directly or indirectly, uses metered LCWSA water and water other than metered LCWSA water, or uses water other than metered LCWSA water exclusively, LCWSA shall determine a method of measuring the Sewage, water or other liquids entering the Sewer System consistent with this policy. In such cases, the sewer Unit Charge shall be based on this determination. All expenses in connection with metering shall be charged to the owner of the land.
9. **Fire Service Units**
- a. **Water Units:** Customers with fire service to their property may incur additional fees as follows:
 - i. Single-Family Residential and Places of Worship with a combined domestic and fire water service connection will not be charged additional fees for fire service and the Service Units shall be based on the water service meter size.
 - ii. Un-metered Fire Service lines shall be inspected annually and shall be assigned additional units based on the size of the fire service as follows:
 1. 4" or less: 5 additional units
 2. 6" – 10 additional units
 3. 8" – 20 additional units
 - iii. Metered Fire Service Lines will be charged based on the meter size as listed in section 3.5 above.

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- b. **Sewer Units:** Total sewer units for any parcel shall match the total water units assigned. However, Sewer Units may be reduced for buildings and/or properties that contain a fire suppression system. The owner shall provide an accurate fixture count indicating all domestic water fixtures which may be used to determine the equivalent domestic water meter size consistent with AWWA M22 calculations. Upon review and inspection by LCWSA staff, the total sewer units may be reduced to match the equivalent domestic water meter size rather than the actual installed water meter size.

PURPOSE

Section 206-c of the New York State Labor Law gives all employees in New York the right to express breast milk in the workplace. This law applies to all public and private employers in New York State, regardless of size or the nature of their business. The New York State Department of Labor has developed the official policy on breast milk expression in the workplace as required by the law, ensuring that all employees know their rights and all employers understand their responsibilities. This policy is the minimum required standard, but employers are encouraged to include additional accommodations tailored to their workplace.

With the information provided below, employees will learn how much time they are allowed for breast milk expression, the kind of space employers are required to provide for breast milk expression, how to notify employers about the need to express breast milk in the workplace, and how to notify the Department of Labor if these rights are not honored.

SCOPE

Employers are required to provide this policy in writing to all employees when they are hired and again every year after. Employers are also required to provide the policy to employees as soon as they return to work following the birth of a child.

POLICY

I. Using Break Time For Breast Milk Expression

Employers must provide reasonable unpaid break time for their employees to express breast milk. In addition, employees must also be permitted to use their paid break time or meal time to express breast milk. This time must be provided for up to three years following childbirth. Employers must provide unpaid break time at least every three hours if requested by the employee. However, the number of unpaid breaks an employee will need to express breast milk is unique to each employee and employers must provide reasonable break times based on the individual. Employers are prohibited from discriminating in any way against an employee who chooses to express breast milk in the workplace.

An employee must be permitted to work before or after their normal shift to make up any time used as unpaid break time to express breast milk, as long as this time falls within the employer's normal work hours. However, an employee is not required to make up their unpaid break time.

All employers must continue to follow existing federal and state laws, regulations, and guidance regarding paid and unpaid break time and meal times regardless of whether the employee uses such time to express breast milk. For additional information regarding what constitutes a meal period or a break period under state and federal law, please see the following resources:

- NY Department of Labor Website on Day of Rest, Break Time, and Meal Periods
dol.ny.gov/day-rest-and-meal-periods
- NY Department of Labor FAQs on Meal and Rest Periods
dol.ny.gov/system/files/documents/2021/03/mealand-rest-periods-frequently-asked-questions.pdf
- U.S. Department of Labor FLSA FAQ on Meal and Rest Periods
dol.gov/agencies/whd/fact-sheets/22-flsa-hoursworked
- U.S. Department of Labor FLSA Fact Sheet on Compensation for Break Time to Pump Breast Milk
dol.gov/agencies/whd/fact-sheets/73-flsa-breaktime-nursing-mothers

While an employer cannot require that an employee works while expressing breast milk, nothing in Labor Law 206-c prevents an employee from voluntarily choosing to do so. Time working while expressing breast milk must be compensated.

Unpaid breaks provided for the expression of breast milk must be at least twenty minutes. However, if the designated lactation room where such break will be taken is not close to an employee's work station, the provided break must be at least thirty minutes. An employee must be allowed to take a longer unpaid break if needed. Employees may also opt to take shorter unpaid breaks.

Employees who work remotely have the same rights to unpaid time off for the purpose of expressing breast milk, as all other employees who perform their work in-person.

II. Making A Request To Express Breast Milk At Work

If an employee wants to express breast milk at work, they need to give employers reasonable advance notice, generally before returning to the workplace if the employee is on leave. This advance notice is to allow employers the time to find an appropriate location and adjust schedules if needed.

Employees wishing to request a room or other location to express breast milk in the workplace should do so by submitting a written request to their direct supervisor or individual designated by their employer for processing requests. Employers must respond to this request for a room or other location to express breast milk in writing within five days.

Employers must notify all employees in writing through email or printed memo when a room or other location has been designated for breast milk expression.

III. Lactation Room Requirements

In addition to providing the necessary time during the workday, employers must provide a private room or alternative location for the purpose of breast milk expression. The space provided for breast milk expression cannot be a restroom or toilet stall. The room or other location must:

- Be close to an employee's work area
- Provide good natural or artificial light
- Be private – both shielded from view and free from intrusion
- Have accessible, clean running water nearby
- Have an electrical outlet (if the workplace is supplied with electricity)
- Include a chair
- Provide a desk, small table, desk, counter or other flat surface

There does not need to be a separate space for every nursing employee. An employer may dedicate a single room or other location for breast milk expression. Should there be more than one employee at a time needing access to a lactation room, an employer may dedicate a centralized location to be used by all employees.

Any space provided for breast milk expression must be close to the work area of the employee(s) using the space. The space must be in walking distance, and the distance to the location should not significantly extend an employee's needed break time.

Employers located in shared work areas, such as office buildings, malls and similar spaces may work together to establish and maintain a dedicated lactation room, as long as such space(s) are a reasonable distance from the employees using the room. Each employer utilizing this common space is individually responsible for making sure the room meets the needs of their employees.

If there is not a separate room or space available for lactation, an employer may use a vacant office or other available room on a temporary basis. This room must not be accessible to the public or other employees while an employee is using it for breast milk expression.

As a last resort, an available cubicle may be used for breast milk expression. A cubicle can only be used if it is fully enclosed with a partition and is not otherwise accessible to the public or other employees while being used for breast milk expression. The cubicle walls must be at least seven feet tall to insure the employee's privacy.

To ensure privacy, if the lactation room has a window, it must be covered with a curtain, blind or other covering. In addition, the lactation space should have a door equipped with a functional lock. If this is not possible (such as in the case of a fully enclosed cubicle), as a last resort, an employer must utilize a sign advising the space is in use and not accessible to other employees or the public.

If the workplace has a refrigerator, employers must allow employees to use it to store breast milk. However, employers are not responsible for ensuring the safekeeping of expressed milk stored in any refrigerator in the workplace. Employees are required to store all expressed milk in closed containers and bring milk home each evening. The space designated for expressing breast milk must be maintained and clean at all times.

If an employer can demonstrate undue hardship in providing a space with the above requirements, the employer must still provide a room or other location - other than a restroom or toilet stall - that is in close proximity to the work area where an employee can express breast milk in privacy, that meets as many of the requirements as possible. Undue hardship is defined in the statute as "causing significant difficulty or expense when considered in relation to the size, financial resources, nature, or structure of the employer's business." **However, an employer may not deny an employee the right to express breast milk in the workplace due to difficulty in finding a location.**

IV. New York State Department Of Labor Resources

If an employee believes that they are experiencing retaliation for expressing breast milk in the workplace, or that their employer is in violation of this policy, should contact the New York State Department of Labor's Division of Labor Standards. Call us at 1-888-52-LABOR, email us at LSAsk@labor.ny.gov, or visit the nearest Labor Standards office to personally file a complaint.

A list of our offices is available at dol.ny.gov/location/contact-division-labor-standards. *Complaints are confidential.*

V. Federal Resources

The federal PUMP Act went into effect in 2023, expanding protections for almost all employees expressing breast milk at work. Under the PUMP Act, any covered workers not provided with breaks and adequate space for up to a year after the birth of a child are able to file a complaint with the U.S. Department of Labor or file a lawsuit against their employers. For more information, please visit dol.gov/agencies/whd/pump-at-work.

PURPOSE

Livingston County Water & Sewer Authority (“Authority”) is committed to the safety and security of our employees. Workplace violence presents a serious occupational safety hazard to our agency, employees, and customers.

SCOPE

All employees will participate in the annual Workplace Violence Prevention Training. The goal of this policy is to promote the safety and well-being of all people in our workplace.

POLICY

Workplace Violence is defined as any physical assault or act of aggressive behavior occurring where a public employee performs any work-related duty in the course of his or her employment including but not limited to an attempt or threat, whether verbal or physical, to inflict physical injury upon an employee; any intentional display of force which would give an employee reason to fear or expect bodily harm; intentional and wrongful physical contact with a person without his or her consent that entails some injury; or stalking an employee with the intent of causing fear of material harm to the physical safety and health of such employee when such stalking has arisen through and in the course of employment.

Acts of violence against any of our employees where any work related duty is performed will be thoroughly investigated and appropriate action will be taken, including involving law enforcement authorities when warranted. All employees are responsible for helping to create an environment of mutual respect for each other as well as customers and visitors, following all policies, procedures and practices, and for assisting in maintaining a safe and secure work environment.

This policy is designed to meet the requirements of New York State Labor Law Art. 2 §27-b and highlights some of the elements that are found within our Workplace Violence Prevention Program. The process involved in complying with this law includes a workplace evaluation that is designed to identify the risks of workplace violence to which our employees could be exposed. Authorized Employee Representative(s) will, at a minimum, be involved in:

- evaluating the physical environment;
- developing the Workplace Violence Prevention Program; and
- reviewing workplace violence incident reports at least annually to identify trends in the types of incidents reported, if any, and reviewing the effectiveness of the mitigating actions taken.

All employees will participate in the annual Workplace Violence Prevention Training Program. The goal of this policy is to promote the safety and well-being of all people in our workplace. All incidents of violence or threatening behavior will be responded to immediately upon notification. All personnel are responsible for notifying the contact person designated below of any violent incidents, threatening behavior, including threats they have witnessed, received, or have been told that another person has witnessed or received.

Designated Contact Person: Jason Molino
Title: Executive Director
E-mail: jmolino@lcwsa.us



Workplace Violence Records Examination

Instructions: Examine records below from the previous year to identify patterns, if any, of injuries in particular areas of the workplace or incidents which involve specific operations or specific individuals. Record the results in the column to the right.

Record Examination	Results of the examination
a. Log of Work Related Injuries and Illnesses (Form SH900) b. Summary of Work Related Injuries and Illnesses (Form SH900.1) c. Injury and Illness Incident Report (Form SH900.2)	
Workplace Violence Incident Reports	
Personnel Disciplinary Reports	
Workers' Compensation Reports	

Assessment of Relevant Policies, Practices, and Procedures

<p>Instructions: Conduct an assessment of policies, work practices and procedures that may impact the risk of workplace violence.</p>	
	<p>Record the results of the assessment and any associated risks below.</p>
<p>Examples of relevant policies: Domestic Violence Sexual Harassment Visitation Policies Policies relevant to the treatment of customers Policies for staff in field travel assignments (daily check-in procedures, itineraries, cell phones provided, etc.)</p> <p>Examples of work practices and procedures: Visitor/Customer sign n/out Escorting visitors/customers Oneclient entrance used Desks clear of objects which may become weapons (might be relevant in situations where dealing with the public) I.D. Badges used Itineraries with employee contact info. Periodic check-in procedures After-hours contact procedures Procedure on how to control/defuse potentially violent situations Supplied with personal alarm/cellular phone/radio Limit visible clues of carrying money/valuables Partnering arrangements if necessary</p>	



Evaluation of Physical Environment

Location:				
Persons conducting the evaluation:				
Date of assessment:				
<p>This section requires the participation of the authorized employee representative(s). Instructions: All sections below refer to present conditions. Check "NA" for any items you do not consider applicable to the worksite/facility being evaluated. Using the information from Sections 1-3 and your working knowledge of the building describe in Section 4 the building i.e. number of stories, number of entrances and exits, number of employees, access to the building, security features, areas of concern related to security. Using the information from Sections 1-4 list the specific hazards related to this evaluation in Section 5.</p>				
Items	Yes	No	NA	Notes/Comments
1. Security Features				
Reception Area Available				
Barriers to Separate Clients from Work Area				
Separate Interview Area(s)				
Emergency Numbers Posted by Phones				
Multiple Exits				
Unobstructed Office Exits				
Door Control(s) i.e. locks, remote buzzer, panic bars				
Door Detector(s) door alarm				
Adequate lighting in and around the workplace				
Parking lot well lighted				
Panic Button(s)				
Video Monitor(s)				
Landscaping to provide unobstructed view of the workplace				
Limiting the posting of signs on windows				
Other:				

2. Factors That Might Place Employees at Risk				
Work in public settings-e.g. Health Care, Police Officers, Firefighters, Social Workers				
Work late night or early morning hours				
Exchange money with the Public				
Work alone or in small numbers				
Work in a location with uncontrolled public access				
Areas of previous security concerns				
Any other factors that might place employees at risk				
3. Security Guards				
Are security guards present at the location				

Evaluation of Physical Environment

4. Description of Building: Using the information from Sections 1-3 and your working knowledge of the building describe in Section 4 the building (number of exists, number of employees, access to the building, security features, areas of concerns related to security.)

LIVINGSTON COUNTY WATER AND SEWER AUTHORITY
LIVINGSTON COUNTY, NEW YORK

**POST ISSUANCE COMPLIANCE POLICY
FOR OBLIGATIONS SUBJECT TO RULE 15c2-12**

I. Scope

This Post Issuance Compliance Policy (“Policy”) applies to all notes, bonds and other indebtedness (“Obligations”) issued by the Livingston County Water and Sewer Authority (the “Authority”) that are subject to the provisions of Rule 15c2-12 promulgated under the Securities Exchange Act of 1934 (“Rule”).

II. Policy Statement

This Policy sets forth specific requirements of the Authority designed to monitor post-issuance compliance by the Authority with applicable provisions of the Rule. This Policy describes various procedures and systems designed to identify, on a timely basis, facts that may be relevant to demonstrating compliance with the requirements that must be satisfied subsequent to the issuance of Obligations in order that the Authority complies with its continuing disclosure undertakings executed and delivered pursuant to the Rule.

III. Policy

The Authority recognizes that compliance with applicable provisions of the Rule is an on-going process, necessary during the entire term of the Obligations. Accordingly, the analysis of those facts and implementation of this Policy will require on-going monitoring and, likely, ongoing consultation with bond counsel and/or counsel to the Authority.

IV. Financing Program

The Authority is authorized under the provisions of Title 8-G of Article 5 of the Public Authorities Law of the State of New York (the “Act”) to undertake the financing and refinancing of certain projects. Pursuant to the Act, the Authority has in the past and may in the future request issue Obligations for the financing and refinancing of projects (the “Financing Program”).

V. Policies and Procedures

The following policies and procedures are adopted for the monitoring of post-issuance compliance with the Authority’s continuing disclosure undertakings and the Rule in connection with Obligations issued by the Authority:

Administration Designee. The Authority’s Executive Director, or in his or her absence, the Deputy Executive Director (collectively “Executive Director”), shall be responsible for

undertaking post-issuance compliance by the Authority with the Authority's continuing disclosure undertakings and the Rule with regard to Obligations issued by the Authority pursuant to the Financing Program. The Executive Director shall be responsible for ensuring an adequate succession plan for transferring post-issuance compliance responsibility when changes in staff occur.

Disclosure in Preliminary Official Statements, final Official Statements or other disclosure documents. Prior to the printing or posting of a preliminary official statement, a final official statement or other form of disclosure document, the Executive Director must review such document for accuracy with regard to information set forth therein concerning the Authority and shall specifically review the information set forth therein with regard to the Authority's compliance with its current continuing disclosure undertakings (if any) in order to determine that such information is correct in all material respects.

Closing Binder. Following the issuance of a specific issue of Obligations under the Financing Program, the Executive Director should obtain and store a closing binder and/or CD or other electronic copy of the relevant and customary transaction documents. The Executive Director shall also store and maintain a file with paper copies of all final official statements and all continuing disclosure undertakings.

EMMA Reporting. For each issuance of Obligations under the Financing Program, the Executive Director should confirm: (i) that the final official statement or disclosure document has been posted on the Municipal Security Rulemaking Board's Electronic Municipal Market Access system ("EMMA"); and (ii) if the Obligations are issued to refund other Obligations, notice of such an event is posted on EMMA.

The Executive Director shall establish and maintain a "tickler" system so that at least thirty (30) days prior to the date when any annual financial information is required to be posted on EMMA, the Executive Director shall receive a reminder notice. The Executive Director shall then prepare or cause to be prepared the appropriate annual financial information required by the continuing disclosure undertaking to be posted on EMMA and to post the same in a timely manner.

If a "material event" or a "listed event," as defined in the Authority's continuing disclosure undertakings or the Rule occurs, the Executive Director shall prepare or cause to be prepared, an appropriate notice to be posted on EMMA, as required by the terms of the continuing disclosure undertakings and the Rule. The current list of material events and listed events are attached hereto as EXHIBIT "A," it being understood that such list may be changed from time to time due to changes in the Rule.

The Executive Director may fulfill all of the EMMA reporting obligations set forth above by engaging a municipal advisor registered with the Securities and Exchange Commission and the Municipal Securities Rulemaking Board to undertake such actions on behalf of the Authority.

Continuing Disclosure Requirements. The Executive Director should monitor and maintain compliance by the Authority of its agreements in its continuing disclosure undertakings, to comply

with all applicable requirements that must be satisfied subsequent to the issuance of the Obligations. The Executive Director shall be responsible for the posting of all information and notices, as appropriate, required to be posted on EMMA in a timely manner. If the Executive Director believes that a material violation or a potential material violation of any such agreement has occurred, the Executive Director shall consult with bond counsel as to what action under the Rule is required, and if so, shall notify the Board of the Authority of such information. The Authority shall thereafter, upon advice of bond counsel, or counsel to the Authority, undertake any recommended action.

The Executive Director shall monitor any changes in the Rule and shall consult with bond counsel to the Authority regarding the need to amend this policy to comply with changes in the Rule. The Executive Director shall also consult with bond counsel or counsel to the Authority, as and when the Executive Director deems it necessary, to make certain that the Executive Director has a working knowledge of the Rule which needs to be complied with by the Authority to maintain compliance with its continuing disclosure undertakings and the Rule.

The Executive Director may engage a municipal advisor registered with the Securities and Exchange Commission and the Municipal Securities Rulemaking Board to assist the Executive Director in fulfilling all of the continuing disclosure obligations set forth above.

Record Retention. The Executive Director will coordinate procedures for record retention and review of such records. Records shall be maintained until all Obligations which financed or refinanced any portion of the Financing Program are retired or are no longer outstanding. Electronic media will be the preferred method for storage of all documents and other records maintained by the Authority.

Periodic Review. The Executive Director will review post-issuance compliance procedures and systems on a periodic basis, but not less than annually.

Manner of Submission. The documents, reports and notices required to be submitted pursuant to this policy shall be submitted through EMMA in an electronic format, and shall be accompanied by identifying information, in the manner prescribed by the Municipal Securities Rulemaking Board (“MSRB”), or in such other manner as is consistent with the Rule.

Further Policies and Procedures. The foregoing list of post-issuance compliance procedures is not intended to be exhaustive. Further policies and procedures may be identified from time to time by Authority’s administration in consultation with bond counsel and Authority counsel, which policies and procedures may or may not be reflected in this Policy.

VI. Effective Date

This Policy is effective on the date of approval set forth below.

VII. Date of Approval

July 19, 2023