

WESTCHESTER LIBRARY SYSTEM
Trustee Meeting
March 30, 2021 – Approved April 27, 2021

REGULAR MEETING

The Regular Meeting of the Westchester Library System was called to order by Karen Zevin, Vice President, at 6:05 p.m. via Zoom. The quorum requirement was met with the following people in attendance:

Board Members present: Andrea Bober, Cathy Draper, Wes Iwanski, Karen Kelley, Maureen LeBlanc, Jonathan Marshall, Julie Mills-Worthey, Francis Okelo, Joseph Puglia, Edris Scherer, Bernie Seiler, Karen Zevin

Board Members absent: Denise Matthews-Serra, Susan Morduch

Also present from WLS were: Terry Kirchner, Wilson Arana, Patricia Brigham, Rob Caluori, Dana Hysell-Alongi, Joe Maurantonio, Elise Burke

Public Library Directors Association (PLDA) Representative: Greg Wirszyła, Director, Bronxville Public Library

Guests: Karen LaRocca-Fels, Director, Ossining Public Library; Mary Kane, Director, Katonah Village Library

MINUTES

President Susan Morduch received a clarification to the minutes of the meeting of February 23, 2021, from Mary Kane, Director of the Katonah Village Library, regarding the issues the library had in connecting to the ILS (Integrated Library System) via a VPN tunnel:

The Katonah Village Library continues to use two companies to manage their technology. Mary Kane is happy with both of them, and appreciated TurnKey's work in setting up their VPN connection.

The Board approved the minutes with the addition of the above statement on a motion by Mr. Puglia and seconded by Ms. Draper. The motion was approved unanimously. [Ms. LeBlanc not present for the vote.]

FINANCIAL REPORTS

The financial report through February 2021 was presented by Ms. Scherer and reviewed in detail by Mr. Caluori. Ms. Scherer noted that Mr. Caluori gave a workshop on the Balance Sheet, which was recorded for those who could not attend. A link to the recording will be put onto the WLS Trustee Development website. It was requested that the link be sent to the WLS Board. The next session will be held on April 28th regarding the Income Statement. Mr. Caluori is working with Ms. Scherer and Ms. LeBlanc on a 3-year comparative Income Statement. The auditors are onsite and an update will be provided.

The financial report was accepted on a motion by Ms. Scherer and seconded by Ms. Draper. The motion was approved unanimously.

ACTION ITEMS

WLS Code of Ethics & Conflict of Interest Policy Revision: Ms. Draper, Governance Committee Chair, noted that over the past months, the Committee reviewed the Code of Ethics and Conflict of Interest Policy #7 and presented to the Board the following revisions to *Item 13. Duty to Disqualify* one month in advance:

13. ~~Duty to Disqualify~~ ***Appearance of Conflict:*** It is incumbent upon any WLS trustee or employee, whether paid or unpaid, to disqualify or recuse him or herself immediately whenever the appearance of a conflict of interest exists. ***For purposes of this paragraph, service on the board of a member library does not in itself constitute the appearance of a conflict of interest. However, a WLS trustee who sits on the board of a member library should bring to the attention of the Executive Director and the WLS Board of Trustees any situation in which the interests of such member library might be, or appear to be, in conflict with those of WLS. In any such situation the WLS Board of Trustees may require such trustee to recuse him or herself from discussion and/or votes affecting such member library.***

The WLS Board approved the above-noted revisions to the Code of Ethics and Conflict of Interest Policy #7 on a motion by Ms. Draper and seconded by Ms. LeBlanc. The motion passed unanimously.

New Health Emergency Plan Policies: Ms. Draper noted that the Governance Committee met and reviewed new legislation that requires public employers to draft and publish a contingency plan in the event of a declared public health emergency involving a communicable disease (e.g., COVID-19). A new Health Emergency Plan and Remote Work Policy were drafted and distributed to the Board one month in advance. A correction was made to the Health Emergency Plan under “Cleaning of Contaminated Areas” on Page 4 to add wording to note “or successor management company” IN CASE Madison Properties, the current building management, was no longer available.

The WLS Board approved the Health Emergency Plan and Remote Work Policy (see attached) on a motion by Ms. Draper and seconded by Ms. LeBlanc. The motion passed unanimously.

Variance Request for New York State Minimum Standards: Dr. Kirchner noted that the NYS Library Division of Library Development (DLD) verifies that all libraries meet the State’s Minimum Standards. This information is supplied by the libraries in the Annual Reports. As of 12/31/2019, all WLS member libraries are in compliance with one exception – Town of Pelham Public Library did not meet Minimum Standard #2 [has a board-approved, written long-range plan of service]. A Variance Form was submitted by the Town of Pelham Public Library which stated that since the library board needed to change focus to formulate a COVID-19 Safety Plan, their efforts in completing their plan of service got delayed. A schedule to complete the plan of service was provided and is expected by July 2021.

The Board approved the submitted Variance on a motion by Ms. Draper and seconded by Mr. Iwanski. The motion passed unanimously. The Variance Form will be submitted to DLD.

PRESIDENT REPORT

Ms. Zevin reported for Dr. Morduch. WLS goals for 2021 are to improve communications to the Board and trustees. Mr. Seiler helped with the Board to Board Questionnaire and is now compiling the over 70

responses received. A complete report of the survey and responses will be shared with the WLS Board. As WLS transitions to a new IT model, a work session for WLS Trustees will be held on April 13 at 6 p.m. Inform Ms. Morduch or Dr. Kirchner with questions. The session will address the Service Level Agreement (SLA) and what the funding model will look like and will provide feedback and information for future options.

COMMITTEE REPORTS

Strategy Committee: Mr. Okelo, Chair, noted that the Committee met on March 15th and discussed mostly organizational matters, what to focus on and how to proceed. Agreed to four things:

- 1) That the Committee will meet every other month on the second Monday. The next meeting is April 12th.
- 2) To be sure that every member of the Committee was clear about its mandate and what is supposed to be done to provide guidance and strategic directions and broad policy recommendations to the board to support the libraries.
- 3) To be committed to having open meetings and including subjects on the agenda so appropriate PLDA / WLS staff may attend.
- 4) That the next meeting will discuss the WLS strategy proposal document with the Executive Director to see whether it is helpful or not in support of the WLS mission.

The Committee members were encouraged to be on alert for ideas to share about new technologies, how other library systems work or other applicable issues. Meeting notes will be taken and shared.

Governance Committee: Ms. Draper, Chair, reminded the Committee members to read through the remainder of the existing WLS Policies and inform her of any needed changes.

Audit Committee: Ms. LeBlanc, Chair, noted that a meeting was cancelled. Mr. Caluori will ask the auditors for a timeline for completion and reschedule the meeting.

Budget Committee: Ms. Scherer, Chair, noted that the committee will begin its work earlier this year in August.

IT Audit Working Group: Mr. Iwanski, Chair, noted that Mr. Arana gave a presentation at the PLDA Meeting on the question of the pricing component and fairest way to charge for services. The SLA was just received from the lawyers, and there will be more to report next month.

Nominating & Board Development Committee: Ms. Zevin, Chair, noted that the committee completed a Trustee Job Description which focused on policy, duties, loyalties, etc. The job description will be posted to the website as part of the WLS Handbook.

EXECUTIVE DIRECTOR'S REPORT

A copy of the Executive Director's Report was mailed in advance of the meeting.

Dr. Kirchner thanked all who came to the WLS Virtual Advocacy visit, which was a good forum to report about the work that the libraries are involved in that support digital equity/inclusion and their support of the

2020 Census efforts. The State budget is looking more positive as both the Senate and House budgets included increases for Library Aid and Public Library Construction Aid as well as \$15 million for digital equity. Additional federal aid is coming through the American Rescue Plan Act, but it is not clear how this funding will be distributed through the States or through IMLS. Neither the timeline for the release of the funds nor guidelines for their use have yet been announced. Dr. Kirchner expects to provide more information to the Board by the May meeting. At the federal level, a total of \$5 billion is being requested for the Build America’s Library Act that supports the expansion of technology and broadband infrastructure. ALA has a number of online advocacy tools to support this bill.

Mr. Caluori noted that the TD Bank line of credit renewal of \$500,000 needs to be renewed. There are no fees or covenants, unless it is used. Even though we do not anticipate any borrowing at this point, renewal will be requested next month.

The Free Direct Access Plan was reviewed at the PLDA March meeting, and one element was requested to be included. This inclusion acknowledges the ability of the member libraries to limit the use of their meeting rooms based on their geographic taxing district. This additional statement serves to support the libraries’ efforts to enforce their own meeting room policies. Hearing no objections, the Free Direct Access Plan with this revision will be forwarded to the member library directors for their board to vote on the Plan. A simple majority and WLS Board approval will suffice for passing the Plan and incorporating it into the WLS Plan of Service 2022-2026.

PLDA LIAISON’S REPORT

Mr. Wirszyła noted that he felt that his February PLDA report had been censored in the minutes because what he had reported at the meeting regarding Katonah’s issues in connecting to the ILS (Integrated Library System) via a VPN tunnel were correct and Mr. Arana’s response was incorrect.

OTHER

Ms. Kane noted that while she appreciated the correction approved to the 2/23 Board Meeting minutes, she did not replace her tech company and she did not understand why that was said. She also noted that there is a strained relationship between the stakeholders and WLS. There was a contentious meeting with PLDA and some are leaving WLS IT. The Board has been made aware that there are differing viewpoints and that not all directors agree that there is a strained relationship. Ms. Mills-Worthey requested a video or transcript from that meeting. Dr. Kirchner will speak with Andrew Farber, President of PLDA, to explore additional ways for PLDA to share what has taken place at their meetings. Ms. LaRocca-Fels noted that not all libraries share the same feelings, but the process to solve problems need to be better understood.

Ms. LaRocca-Fels thanked WLS for sharing information from Westchester County about COVID vaccine availability at Westchester Community College. A number of her staff were able to get vaccinated.

Mr. Marshall noted that Bonnie Katz, long-time Adult Librarian at Ossining Public Library, passed away. She was much beloved by the members of her community.

Mr. Marshall also thanked Ms. Brigham for her efforts to garner funds from the Westchester Community Foundation to support the digital equity programs.

Mr. Wirszyla noted that although the proposed IT finance model is said to be based on the Ramapo-Catskill Library System (RCLS) model, theirs shows e-rate credits that apply to the member libraries and the WLS approach does not. To help clear up confusion around e-rate and the way that it is or may be applied to the current and future models used by WLS, Ms. Mills-Worthey recommended that this topic be explored in more detail at the April 2021 Board Meeting.

ADJOURNMENT

Having completed its agenda, and no other requests to speak, the Board adjourned its meeting at 7:04 p.m. on a motion by Ms. Scherer and seconded by Mr. Seiler that passed unanimously.

Respectfully submitted,

/s/ Bernie Seiler

Bernie Seiler
Secretary

HEALTH EMERGENCY PLAN

PURPOSE

The Westchester Library System (WLS) has adopted this Health Emergency Plan in compliance with New York State Labor Law §27-c to implement operational plans in the event of certain declared public health emergencies including, but not limited to, COVID-19 or other communicable disease or pandemic illness.

The primary goals of WLS's Health Emergency Plan are to establish:

- The roles and responsibilities during all phases of a public health emergency
- Preparedness activities and response protocols
- Coordination and decision making for the continuation of operations

The Health Emergency Plan is designed to ensure precautionary, response, and recovery measures to a public health emergency involving a communicable disease threatening to impact or immediately impacting WLS's staff, trustees, volunteers, and/or community members.

ADMINISTRATION

The Executive Director as authorized by the Board of Trustees administers the Health Emergency Plan. This includes activating the plan, establishing an internal communications network and coordinating all response and recovery activities. If, for any reason, the Executive Director is unable or unavailable to administer the plan, administrative authority shall be passed to the Chief Financial Officer.

DEFINITIONS

The following terms are hereby defined for the purposes of this policy:

- **Personal Protective Equipment (PPE):** Equipment worn to minimize exposure to communicable disease or pandemic illness as mandated by local, state, or federal law and/or any Executive Orders related to the public health emergency or mandates issued by federal agencies including the Center for Disease Control (CDC) and the Occupational Safety and Health Administration (OSHA).
- **Employee:** Any person employed by WLS regardless of job classification or title.

- **Contractor:** Any individual performing paid services for the library but not an employee of WLS.
- **Essential:** Designation made to an employee or contractor whose duties require them to be physically present at the Westchester Library System to perform their job, or tasks that are vital or necessary to the safety or operational needs of WLS.
- **Non-essential:** Designation made to an employee whose duties do not require them to be physically present at the Westchester Library System, or tasks that are not vital or necessary to the safety or operational needs of WLS.
- **Communicable disease:** Illness caused by an infectious agent that occurs through the direct or indirect transmission of the infectious agent or its byproducts or via inanimate environment or object to a susceptible person or persons.
- **Retaliatory Action:** The discharge, suspension, demotion, penalization, discrimination or other adverse employment action taken against any employee.

ESSENTIAL EMPLOYEES OR DUTIES

In the event of a state-ordered reduction of in-person workforce, the Executive Director shall be designated as an Essential Employee and is permitted to be physically present at the Westchester Library System to perform tasks essential to their job or the operations of WLS including, but not limited to, maintenance to the facilities that could otherwise threaten or pose a risk to WLS's facilities if not performed; bookkeeping such as accounts payable, accounts receiving, and processing payroll; and/or accepting, sorting, and opening postal mail or packages.

These essential tasks may be delegated to a specific employee or contractor at the discretion of the Executive Director. This employee or contractor is permitted to be physically present at WLS to perform only the designated essential tasks as assigned.

TELECOMMUTE/WORK FROM HOME

In the event of a state-ordered reduction of in-person workforce, the Westchester Library System's Remote Work Policy will be implemented.

All employees whose duties and routine tasks require the use of a computer and/or Internet access will be provided WLS-issued equipment necessary to perform those duties and tasks.

The Executive Director will provide instructions for downloading/installing any software for employees to perform their duties remotely. The Executive Director will also provide

instructions for transferring office phone lines to personal cell phones as applicable to the employee's job description.

IN-PERSON REPORTING

The Executive Director will coordinate the schedule for employees and contractors reporting to WLS in-person to perform essential tasks so that WLS remains in compliance with the state-ordered reduction of in-person workforce. No employee or contractor is permitted to report to the WLS office without authorization from the Executive Director.

PERSONAL PROTECTIVE EQUIPMENT

PPE as required by local, state or federal laws or Executive Orders will be provided by WLS. As per OSHA guidelines, employees are not financially responsible for mandated PPE. Employees may provide their own PPE if they desire and if it is in compliance with all local, state or federal laws or Executive Orders and CDC and OSHA regulations.

WLS will provide any necessary training for mandated PPE including proper use and disposal.

WLS will keep a supply of PPE in storage in the event a public health emergency is immediately declared. All employees will be aware of the storage location of PPE. The Executive Director will monitor PPE supply levels and replenish the supply as needed.

Failure of an employee to comply with PPE mandates may result in disciplinary action.

EXPOSURE TO COMMUNICABLE DISEASE

If required by local, state or federal laws or Executive Orders, mandatory, continuous health screening practices will be implemented for all employees.

In the event an employee is exposed to a known case of the communicable disease that is the subject of the public health emergency, exhibits symptoms of such disease or tests positive for such disease, the following procedures will be immediately implemented:

- The employee must not report to the work site or they must leave the premises immediately, if already at work, and notify the Executive Director.
- The Executive Director will notify both local and state health departments and will follow guidance specific to workplaces with a suspected or positive case.

- The Executive Director and the employee will determine which other staff members were in close contact and possibly exposed to the communicable disease.
- The Executive Director and the employee will determine which areas of the work site are now considered “contaminated” and need to be immediately closed.

Cleaning Contaminated Areas

- The work site will immediately close off contaminated area(s).
- The area(s) will be quarantined for a length of time determined by local or state health departments.
- The HVAC system will be temporarily turned off in the area(s) so that particles will not circulate throughout the facility.
- After the determined length of time, the area(s) used by the employee will be cleaned, vacuumed and disinfected including offices, workspaces, cubicles, bathrooms, common areas, shared equipment such as computers, tablets, keyboards and shared office supplies.
- The area(s) will be cleaned by Madison Properties (or current building management) using OSHA and CDC approved cleaning supplies and disinfectants while wearing appropriate PPE.
- Once the area(s) has (have) been appropriately disinfected, the area(s) can be opened for use.
- Routine cleaning and disinfecting and logging of these activities as recommended will continue.

Contact Tracing

The Executive Director will adhere to local and state guidance regarding contact tracing. This may include reporting or contacting other employees, contractors, visitors and patrons who voluntarily supplied their information for the purpose of contact tracing and who may have been in close contact with the employee(s) suspected or confirmed to have the communicable disease.

The Executive Director and the designated contract tracing team will keep the health status of employees confidential.

Compensation

WLS will adhere to all local, state and federal laws or Executive Orders regarding sick leave or expanded family and medical leave for specified reasons related to this communicable disease.

Returning to Work

- An employee who is exposed to the communicable disease or exhibits symptoms of the communicable disease must follow all local and state health department directives, which may include being tested for that communicable disease and/or quarantining for a specified amount of time at home.
- An employee who has a suspected or confirmed case must not report back to work until they have met all of the required criteria in consultation with a healthcare provider and in accordance with local, state and/or federal criteria specific to the communicable disease.
- All other employees will be provided instructions for returning to work dependent on the determination of risk of exposure by the local or state health department during contact tracing.

Mitigating Risk

Reporting to work following a known exposure to the communicable disease, having symptoms consistent with the communicable disease or following a positive test without being medically cleared to return to work as defined above will be considered a violation of WLS policy and may result in disciplinary action.

WLS will not take any retaliatory action for employees not reporting to work due to a suspected or confirmed case of the communicable disease. Employees must follow the established protocols outlined in the Personnel Policy/Employee Handbook for reporting an absence.

CONTINUATION OF OPERATIONS

In the event of a declared public health emergency involving a communicable disease, the Executive Director will address operations according to the following outline. Some circumstances will require deviation from this sequence in order to best serve the safety and health of WLS staff and visitors.

- Assess the emergency declaration as it relates to the organization's facilities, materials, staff and community.
- Notify the appropriate persons, including employees and the Board of Trustees.

- Determine the next steps, with the information available, regarding:
 - Services or service points
 - Hours of operation
 - Personnel
- Draft a press release or statement to the public.
- Document in detail the sequence or timeline of events before, during and after the declared public health emergency.
- Prepare for recovery.

COMMUNICATION

Once approved by the Board of Trustees, this Health Emergency Plan will be published in a clear and conspicuous location at WLS and on the website. A copy will be provided to all employees.

ONGOING USE EVALUATION

This Health Emergency Plan was developed as required by law with the health and safety of WLS's employees and community as the top priority.

The Health Emergency Plan will be evaluated annually by the Director and Board of Trustees and updated as needed.

Questions or concerns regarding Westchester Library System's Health Emergency Plan should be directed to the Executive Director.

ADOPTED by the Westchester Library System Board of Trustees __/__/2021

Remote Work Policy

“Remote Work” is work performed in furtherance of routine duties at places other than the Westchester Library System (WLS)’s business address.

WLS uses three types of Remote Work:

1. When determined per American with Disabilities Act (ADA) regulations to be a reasonable accommodation
2. Remote Work during an emergency as described in Section I below
3. Remote Work as part of a routine “Remote Work Program” as described in Section II below

Remote Work as a reasonable accommodation is governed by the ADA and New York State Laws.

SECTION I: REMOTE WORK DURING AN EMERGENCY

For purposes of this Policy, an “emergency” is determined solely by WLS.

Remote Work during an emergency is a temporary way to continue essential WLS operations and sustained service to member libraries. During an emergency, WLS may require employees to work remotely.

To the greatest extent possible during the emergency, WLS will use the guidelines in Section II to arrange Remote Work accommodations with employees. However, it will be understood that many employees may not have the ability to meet the requirements regarding a professional work environment in their home, and that factor will not be considered for performance evaluation purposes when the employee is required to work from home during an emergency. Further, typical eligibility requirements may be waived.

If a technical concern prohibits productive access to working remotely during scheduled worktime during an emergency, an affected employee must notify the Executive Director by telephone as soon as possible. An employee who has been required to work remotely should not report to the WLS site, even if there are technical concerns, unless directed to do so.

SECTION II: REMOTE WORK PROGRAM

Working remotely can be beneficial for employees for a number of reasons. It can help employees balance their work/home life if they have long commutes, pre- or post-work activities, and can also enable employees to work from home when it is of benefit to WLS.

This program will be most successful for those employees who are self-disciplined and have a remote work environment free from distractions.

All remote work schedule/hours must be pre-approved by the Executive Director.

Working remotely is not a replacement for appropriate child or dependent care or for otherwise attending to personal needs or obligations. The focus of the arrangement must remain on job performance, meeting business demands or dates set by the Executive Director. Errands, home maintenance, and all other non-work-related activities are prohibited during the employee's work hours unless approved by a supervisor and accounted for appropriately on the employee's timesheet.

Eligibility

The Executive Director will determine which roles within the organization are eligible for remote work. Recognizing that some roles require an employee to be present at WLS either at all times or on occasion, eligibility for remote work is not inherent to all positions.

Equipment and Tools

WLS will provide the necessary tools/equipment for the employee to perform their duties. This may include computer hardware, computer software, email, voicemail, and other equipment. The employee must have access to high-speed Internet (i.e., minimum speed requirement is 10 MBPS (megabits per second) download speed and 5 MBPS upload speed).

Office supplies may be obtained at the WLS Business Office. Out-of-pocket expenses for office supplies will not be reimbursed unless approved by the Executive Director in advance and in writing. The use of equipment and software provided by WLS for use at the remote work location is limited to the employee for purposes relating to WLS business. All WLS provided equipment, data, information, and resources remain the property of WLS.

If the employee is unable to log into computer system or otherwise connect to required software within one hour during the scheduled work time, the employee must inform their supervisor and return to the office, except in the case of an Emergency as described in Section I of this policy. Failure to do so will result in an absence.

Requirements

The employee will establish an appropriate work environment within their home for work purposes that is free from distractions. The employee shall maintain this workspace in a safe condition, free from hazards and other dangers to the employee and equipment.

Employees must ensure that service provided to member libraries, vendors and partners is not adversely affected. Remote work productivity and performance must be effective, and this policy should not create inequity for other employees. If performance standards are not being met by the individual or department, as observed by the Executive Director, the necessary changes to an individual or department schedule will be made, including but not limited to returning the individual to a schedule and work location that best serves the business needs of WLS.

Consistent with WLS's expectations of information security for employees working at the office, employees working from home will be expected to ensure the protection of WLS and member libraries and vendor information accessible from their home office. Steps may include use of locked file cabinets and desks, regular password maintenance, and any other steps appropriate for the environment.

Employees are expected to work their entire schedule and are required to record all hours worked and major tasks accomplished on a daily basis on the WLS timesheet.

Maintaining a Professional Work Environment

Employees who participate in the Remote Work Program are expected to create a positive and professional experience for the member libraries. It is each employee's responsibility to ensure they have established a work area in the home that is free from domestic noise and interruptions during the full length of their assigned work day to be able to deliver exceptional customer service and a high-quality interaction.

During the course of verbal or video communication with member libraries, vendors, partners or other professional/business related entities, domestic noise and interruptions include, but are not limited to: TV, radio and other electronic noise emitting devices; audible household member conversations or activities; pet noise.

Program Provisions

WLS reserves full discretion to amend, terminate, or suspend any and all provisions of the Remote Work Program.

Performance Expectations & Evaluations

Employees participating in the Remote Work Program are to complete all assigned work according to procedures and expectations mutually agreed upon by the employee, the employee's supervisor and the Executive Director, and according to the job expectation and description.

A decline in performance may be grounds for removal from the Remote Work Program participation, and/or disciplinary action up to and including termination. Participating employees will be required to meet in the office as necessary, appropriate, or requested. This includes, but is not limited to, attending training sessions, participating in meetings, reviewing work products and performance, and receiving assignments.

Liability and Worker's Compensation

The employee's home workspace will be considered an extension of the WLS's workspace. Therefore, WLS will continue to be liable for job-related accidents that occur in the employee's home workspace during the employee's working hours.

During work hours and while performing work functions in the designated work area of the home, employees are covered by worker's compensation. WLS assumes no liability for injuries occurring in the employee's home workspace outside the agreed-upon work hours.

WLS is not liable for loss, destruction, or injury that may occur in or to the employee's home. This includes family members, visitors, or others that may become injured within or around the employee's home.

In the event a job-related injury occurs during working hours at the employee’s home, the employee shall notify WLS as soon as possible, and in no event no later than 48 hours after the event occurred.

Income Tax

It will be the employee’s responsibility to determine any tax implications of maintaining a home office area for a not-for-profit employer. WLS will not provide tax guidance nor will WLS assume any additional tax liabilities. Employees are encouraged to consult with a qualified tax professional to discuss tax implications.

Adopted by the WLS Board of Trustees ___/___/2021

DRAFT