All policies of the Wyoming Music Educators Association are under biennial review of the Executive Committee, with revision approval of the whole of the Executive Board.

Signed compliance statements of *Conflict of Interest, Anti-Trust,* and *Written Information Security* are collected from each officer at the first meeting of the fiscal year. These statements are maintained for the term of office and kept on file with the WMEA Secretary.

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Anti Trust Policy  
Approved, August 2, 2014

Statement  
The Wyoming Music Educators Association (WMEA) is a not-for-profit organization. The association is not organized to and may not play any role in the competitive decisions of its members or their officers or appointees, nor in any way restrict competition among members or potential members. Rather it serves as a forum for a free and open discussion of diverse opinions without in any way attempting to encourage or sanction any particular business practice.

The association provides a forum for exchange of ideas in a variety of settings including its annual meeting, educational programs, committee meetings, and Board meetings. The WMEA Executive Board recognizes the possibility that the Association and its activities could be viewed by some as an opportunity for anti-competitive conduct. Therefore, this policy statement clearly and unequivocally supports the policy of competition served by the antitrust laws and to communicate the WMEA Executive Board's uncompromising policy to comply strictly in all respects with those laws.

While recognizing the importance of the principle of competition served by the antitrust laws, the WMEA Executive Board also recognizes the severity of the potential penalties that might be imposed on not only the Association but its members as well in the event that certain conduct is found to violate the antitrust laws. Should the board members or their appointees be involved in any violation of federal/state antitrust laws, such violation can involve both civil and criminal penalties that may include imprisonment for up to 3 years as well as fines up to $350,000 for individuals and up to $10,000,000 for the Association plus attorney fees. In addition, damage claims awarded to private parties in a civil suit are tripled for antitrust violations. Given the severity of such penalties, the WMEA Executive Board intends to take all necessary and proper measures to ensure that violations of the antitrust laws do not occur.

Policy  
In order to ensure the Wyoming Music Educators Association and its members, officers and appointees comply with antitrust laws, the following principles will be observed:

- The association or any committee, section, chapter, or activity of the association shall not be used for the purpose of bringing about or attempting to bring about any understanding or agreement, written or oral, formal or informal, expressed or implied, among two or more members or other competitors with regard to prices or terms and conditions of contracts for services or products. Therefore, discussions and exchanges of information about such topics will not be permitted at WMEA meetings or other activities.
• There will be no discussions discouraging or withholding patronage or services from, or encouraging exclusive dealing with any supplier or purchaser or group of suppliers or purchasers of products or services, any actual or potential competitor or group of actual potential competitors, or any private or governmental entity.

• There will be no discussions about allocating or dividing geographic or service markets for any single private or public interest.

• There will be no discussions about restricting, limiting, prohibiting, or sanctioning advertising or solicitation that is not false, misleading, deceptive, or directly competitive with WMEA products or services.

• There will be no discussions about discouraging entry into or competition in any segment of a marketplace associated with WMEA.

• There will be no discussions about whether the practices of any member, actual or potential competitor, or other person are unethical or anti-competitive, unless the discussions or complaints follow the prescribed due process provisions of the WMEA bylaws.

• Certain activities of the association and its members are deemed protected from antitrust laws under the First Amendment right to petition government. The antitrust exemption for these activities, referred to as the Noerr-Pennington Doctrine, protects ethical and proper actions or discussions by members designed to influence: 1) legislation at the national, state, or local level; 2) regulatory or policy-making activities (as opposed to commercial activities) of a governmental body; or 3) decisions of judicial bodies. However, the exemption does not protect actions constituting a "sham" to cover anticompetitive conduct.

• Speakers at committees, educational meetings, or other business meetings of the association shall be informed that they must comply with the association's antitrust policy in the preparation and the presentation of their remarks. Meetings will follow a written agenda approved in advance by the association or its legal counsel.

• All meetings will follow a written agenda. Minutes will be prepared after the meeting to provide a concise summary of important matters discussed and actions taken or conclusions reached.

At informal discussions at the site of any WMEA meeting all participants are expected to observe the same standards of personal conduct as are required of the association in its compliance.

Any questions regarding the meaning or applicability of this policy, as well as any concerns regarding activities or discussions at WMEA Executive Board or WMEA General Assembly meetings, should be promptly brought to the attention of the President or Executive Director.
WMEA Executive Board Statement of Adherence to Anti-Trust Policy

I understand my responsibility as a member of the WMEA Executive Board, to comply in all respects with federal and state antitrust laws. If I become aware of a potential violation of this policy, I will immediately disclose all information to the WMEA President and/or Executive Director. I understand that, when in doubt, disclosure is recommended.

NAME (please print) __________________________________________________________

BOARD POSITION __________________________________________________________

TERM OF OFFICE ____________________________________________________________

SIGNATURE ________________________________ DATE __________

Signed and dated copies of the Anti-Trust Policy compliance statement for each member of the Executive Board remain on file with the WMEA Secretary during each term of office.
Code of Ethics, Duty of Care
Approved September 13, 2008
Review Approval May 2, 2014

Service on the Executive Board of Wyoming Music Educators Association is an important honor and responsibility. The membership of the association relies on the board to act in its best interests, to be knowledgeable about and proactive on the issues facing music education, to study the questions before the board and to base decisions on reliable information, to be good stewards of the resources of the association, and to be honest and trustworthy in all actions.

To assure the trust and ethical expectations of the members of the Wyoming Music Educators Association, The Executive Board members of WMEA affirm the policy as stated below.

**Code of Ethics**
In all matters, the Executive Board of Wyoming Music Educators Association is committed to observing and promoting the highest standards of ethical conduct in the performance of their duties. Board members pledge to accept this code as a minimum guideline for ethical conduct and shall abide by the following:

**Accountability**
- Faithfully abide by the articles of incorporation, bylaws and policies of the association.
- Exercise reasonable care, good faith and due diligence in Executive and managing affairs.

**Professional Excellence - Integrity**
- Maintain a professional level of courtesy, respect, and objectivity in all matters and activities.
- Strive to uphold those practices and assist other members of the board in upholding the highest standards of conduct.

**Personal Gain – Self-Dealing**
- Exercise the powers invested for the good of all members of the association rather than for personal benefit.

**Equal Opportunity – Diversity**
- Ensure the right of all members to access benefits and services without discrimination on the basis of culture, geography, religion, socio-economic status or political affiliation.
- Ensure the right of all members to access benefits and services without discrimination on the basis of the association’s volunteer make-up in respect to gender, sexual orientation, national origin, race, religion, age, political affiliation or disability, in accordance with all applicable legal and regulatory requirements.
Collaboration and Cooperation

- Respect the diversity of opinions as expressed or acted upon by the association’s board, committees and membership, and formally register dissent as appropriate.
- Promote collaboration, cooperation, and partnership among association members.

Duty of Care

In all matters affecting the Wyoming Music Educators Association, Executive Board members pledge to abide by the following:

- Act in good faith and exercise best efforts in the performance of stated duties.
- Faithfully prepare for discussions and decisions that affect the association by reading information in advance and strive to be knowledgeable on issues of importance to the association.
- Be responsible for disseminating information to constituents.
- Make decisions based on factual data rather than unsubstantiated opinions.
- Make decisions based on what is in the best interest of all members of the association, rather than any one group, individual, or special interest.
- Be honest in doing the work of the association and in speaking on behalf of the association and its leadership in order to foster trust among association members and the public.
- Respect fellow board members and the members of the association, acknowledging differences of opinion, providing for open and respectful discussion, and making decisions only after listening to all points of view and all available data.
- Publicly support the majority decisions made by the Executive Board.
- Support and encourage participation in all association programs including endorsed programs.
Confidentiality, Conflict of Interest
Approved September 13, 2008
Review Approval May 2, 2014

Principles and practices of the Wyoming Music Educators Association provide guidance and
direction for effective governance. Members of the Executive Board are committed to observing
and promoting the highest standards of ethical conduct in the performance of their
responsibilities on the board of the Wyoming Music Educators Association. Board members
pledge to accept this code as a minimum guideline for ethical conduct.

Confidentiality
I will respect the confidentiality of sensitive information known to board service and used for the
purposes of governance and management. I will not disclose, beyond its intended scope, any
information that is marked, designated, or treated as confidential by the board, officers, or
members and which I receive as an officer or appointee of the Wyoming Music Educators
Association. I understand that my obligation to maintain confidentiality extends indefinitely
beyond my term of office.

Conflict of Interest
I acknowledge that all Wyoming Music Educators Association information, programs, research,
services, and methods of operation are developed by WMEA for all members and as a board
member I am obligated to pass on this information to my constituencies. Therefore I will not
expropriate for myself, my business, or another organization, any information I receive as a
result of my position on the board of the Wyoming Music Educators Association prior to
disseminating this information to my constituents. I will not create any program that is in direct
competition with a WMEA program including the Annual Conference, or any other programs
that the association may develop in the future. I will openly declare any actual or perceived
conflict of interest that may result from my taking part in discussion or decision making on an
issue before the association while having business, professional, or personal interests that could
bias my decisions. I further acknowledge that the WMEA Executive Board has the sole
responsibility for determining whether my interests constitute a conflict and if so what the
remedy will be.

Any potential conflict of interest that could result in a direct or indirect financial or personal
benefit to a board member must be disclosed in good faith or known to the Executive Board or
Executive Committee authorizing a contract or other transaction. All questions as to whether a
conflict of interest exists shall be resolved by a vote of the Executive Board in which the
interested individual may not vote.
WMEA Executive Board Statement of Conflict of Interest

At present, I am aware of the following potential conflict(s) of interest in regard to my position on the Executive Board of the Wyoming Music Educators Association (if none, leave blank):

__________________________________________________________________________________________

__________________________________________________________________________________________

__________________________________________________________________________________________

__________________________________________________________________________________________

__________________________________________________________________________________________

__________________________________________________________________________________________

__________________________________________________________________________________________

__________________________________________________________________________________________

If I become aware of a potential conflict of interest in the future, I will immediately disclose this potential conflict to the President. I understand that, when in doubt, disclosure is recommended.

NAME (please print) _______________________________________________________________________

BOARD POSITION _________________________________________________________________________

TERM OF OFFICE _________________________________________________________________________

SIGNATURE ________________________________ DATE __________

Signed and dated copies of the Conflict of Interest Policy compliance statement for each member of the Executive Board remain on file with the WMEA Secretary during each term of office.
Disclosure Policy
Approved September 13, 2008
Review Approval May 2, 2014

The WMEA Information Disclosure Policy is intended to ensure that information concerning WMEA operational activities is made available to the public in the absence of a compelling reason for confidentiality. The principal element of the WMEA approach to information disclosure, public awareness and transparency is the identification of a standard package of documents that track programs and operations of the Wyoming Music Educators Association. To the extent that much of this documentation is already available to the public as matter of practice, the following policy codifies such practice.

The following package of documents is available for public inspection at www.wyomea.org:

- Form 990
- Annual Financial Statements
- Executive Documents of the Association
- State of Wyoming Annual Report
- Code of Ethics, Confidentiality, Conflict of Interest Policy
- Disclosure Policy
- Document Retention and Destruction Policy
- Investment Policy
- Meeting Minutes and Archives Policy
- Whistleblower Policy
- WMEA Music Industry Directory

Records of interest to the association and provided for inspection (www.wyomea.org/membersonly) by the membership but not made public are:

- Directory of Music Educators in Wyoming
- WMEA Music Industry
- WMEA Board Meeting Minutes
- WMEA Annual Budget

Records of interest to the association and provided for inspection by the executive committee but not made public (produced in booklet format) are:

- WMEA Membership Roster with Personal Contact Information
Document Retention and Destruction Policy

Approved September 13, 2008
Review Approval May 2, 2014

The WYOMING MUSIC EDUCATORS ASSOCIATION (WMEA) shall retain records for the period of their immediate or current use, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements including W.S section 17-19-1601 (2007). Records and documents outlined in this policy include paper, electronic files (including emails) and voice mail records regardless of where the document is stored, including network servers, desktop or laptop computers and handheld computers and other wireless devices with text messaging capabilities. Email and electric correspondence shall be saved as a hard copy for permanent records.

Any board member of WMEA or any other person who is in possession of records belonging to WMEA who is uncertain as to what records to retain or destroy, when to do so, or how to destroy them, may seek assistance from association president or Executive Director.

In accordance with State and Federal laws, WMEA shall not knowingly destroy a document with the intent to obstruct or influence an investigation or proper administration of any matter within the jurisdiction of any department, agency of the United States or in relation to or contemplation of such matter or case. If an official investigation is under way or even suspected, document purging must stop in order to avoid criminal obstruction. In order to eliminate accidental or innocent destruction, WMEA has the following document retention policy:

PERMANENT RECORDS
- Organizational Documents (Articles of Incorporation, Constitution ad Bylaws, Tax Exempt Application, Letter of Determination)
- Minute Books and By-Laws
- Audit records and reports
- Cancelled checks for important payments, i.e., taxes, purchases of property, special contracts, etc. (checks should be filed with the papers pertaining to the underlying transaction)
- Capital investment records: ledgers, transfer registers, stubs showing issues, record of interest coupons, options, etc.
- General cash and checking ledgers
- Chart of accounts
- Correspondence (legal and important matters only)
• Financial statements-end of year (other months optional)
• Form 990 and supporting documents
• Insurance records
• Contracts
• Journals
• Tax returns and worksheets, Revenue Agents' Reports and other documents relating to determination of income tax liability
• Trademark registrations

SIX TO SEVEN YEARS
• Accounts payable
• Accounts receivable ledgers and trial balances
• Bank Statements
• Cancelled checks (see exception under Permanent Records)
• Expense Records
• Inventories of products, materials and supplies
• Invoices from vendors
• Purchase orders
• Purchase Receipts
• Sales records
• Contracts for Services

TWO TO THREE YEARS
• General Correspondence
• Insurance policies that have expired
• Internal audit working papers
• Miscellaneous internal reports

ONE YEAR OR LESS
• Bank reconciliations (keep one year)
• Correspondence of unimportant nature with members, clinicians or vendors
• Duplicate deposit slips
• Requisitions

WMEA record/document destruction shall comply with all applicable Wyoming and Federal laws and will follow the retention guidelines stated above. All non-required documents bearing the association name, account name or numbers, and/or any other private information of the association shall be shredded and bagged for refuse collection.

WMEA archival records and document locations:
President – Historical Board Manuals, State Conference Reports
Secretary – Minutes, By-Laws/Policies
Executive Director – Financial Records, Business Records, Conference Records
Investment Policy
Approved September 13, 2008
Review Approval May 2, 2014

The purpose of the Wyoming Music Educators Association Investment Policy Statement is to prescribe a prudent and acceptable investment philosophy and define investment management procedures and long-term goals for the association. This is not a contract. This policy reflects current status and philosophy regarding the investment portfolio for the WMEA. These policies shall be reviewed and revised biennially to ensure that they adequately reflect any changes related to the WMEA portfolio or capital markets.

Overview
Wyoming Music Educators Association
Nonprofit Corporation in the State of Wyoming
IRS 501 (c)(3) Not-for-profit
Authorized Investment Committee is the acting Executive Committee:
 President, President-Elect, Past-President, Elementary Vice President, Secretary
(Executive Director is ex-officio, non-voting.)
Authorized Signers: Executive Director and President in rotation
(Begins with Elect for 6-yr time of rotation.)

Purpose
The purpose of the WMEA is expressed in the mission statement, “to further the advancement of music education in Wyoming through public and private instruction, and encourage lifelong appreciation of and involvement in music.” The mission is dependent on promoting professional development, service, advancement of knowledge, and association leadership. It is the Executive Board’s duty to implement fiscal responsibility in support of the association mission.

Specific Objectives
WMEA shall have a goal of establishing and maintaining funds in a reserve account at an amount equal to one year’s operating budget.
 a. These amounts shall be considered as a “rainy day” fund for emergencies.
 b. The operating budget adopted each year should be balanced to avoid having to use reserves for normal annual operations.
 c. The reserve account shall be in the form of an interest-bearing certified deposit or money market account through the bank holding the checking account.
WMEA shall maintain additional accounts in an investment portfolio of assets above and beyond the reserve account with the goal of achieving a long-term return. The return shall be gained by investing funds in interest-bearing certified deposit or money market accounts at two or more banks.

The Executive Committee upon recommendation from the Executive Director shall determine the duration of investment maturity.

At the end of each budget year, the Executive Committee shall recommend the disposition of any extra revenues in the operations account.

**Time Horizon:**
For purposes of planning, the WMEA time horizon is in excess of TEN years.

**Risk Tolerance**
Given the relationship between risk and return, and funds available for investment, WMEA rates its risk factor as **LOW**. The WMEA recognizes that higher returns involve some volatility and is unwilling to tolerate declines in the value of the investment portfolio at this time.

**Asset Allocation**
The WMEA shall maintain a checking account with adequate monthly balance to cover budgeted expenses for the association to be maintained at **Bank of the West**.

The WMEA shall work toward a reserve in the form of certified deposits or money market accounts equal to one year’s operating budget to be maintained at the **Bank of the West**.

The WMEA shall maintain investment funds in the form of interest bearing certified deposits or money market accounts of varying amounts and duration to achieve the highest rate of interest at the **American National Bank**.

The WMEA shall maintain a checking account at the **American National Bank** under the name of WMEA Scholarship Fund.

The WMEA shall maintain a savings account at the **American National Bank** under the name of WMEA Executive Director’s Fund.

Interest earned on the investment accounts shall be rolled-over to increase the reserves and not considered as available for operations. No guarantees can be given about future performance and this Investment Policy Statement shall not be construed as a guarantee of investment performance.
Duties and Responsibilities

American National Bank and Bank of the West are expected to manage the WMEA funds in a manner consistent with the Investment Policy Statement and in accordance with State and Federal law.

The WMEA Executive Board shall be responsible for:
1. Overseeing the portfolio of assets.
2. Defining investment objectives and policies.
3. Directing the Executive Director to make changes in investment policy and to oversee recommendations with regard to policy, guidelines, objectives and specific investments on a timely basis.
4. Reading and understanding the information contained in the financial reports and investments of the Portfolio.

Audit Committee

The Audit committee of President Elect, Past President, one of the Vice Presidents as appointed by the President, is responsible for reviewing the internal audit and audit report, as presented by the State Executive Director.

External Accountant

The Executive Director is responsible for an independent CPA’s review of the statements and footnotes of the internal audit to ensure compliance with generally accepted accounting principles (GAAP) and to render an opinion on the fairness of the financial statements. The audit report issued by the CPA expresses an opinion about whether the financial statements present fairly, the financial position, operating results, and cash flows in accordance with generally accepted accounting principles (GAAP). The accountant’s review is prepared in conjunction with tax form preparation.

Review

The Executive Director performs inquiry and analytical procedures that provide the accountant with a reasonable basis for expressing limited assurance that there are no material modifications that should be made to the financial statements in order for them to be in conformity with generally accepted accounting principles (GAAP)

Compilation

A compilation of information is presented in the form of a financial statement of information that is the representation of account management without undertaking to express any assurance on the statements. It is a cursory review of the association’s financial operations.

Current

On an ongoing basis, monthly and to-date statements of financial status are prepared by the Executive Director. Current statements included organizational and operations income and expense records, assets on account and total asset to-date.
Meeting Minutes and Archives
Approved September 13, 2008
Revised May 2, 2014

The Wyoming Music Educators Association Minutes shall be recorded at every meeting of the WMEA Executive Board and at all committing meetings. They shall reflect the actions taken at the meeting and serve to protect the association. The secretary shall also prepare an action log for permanent documentation of consent actions pursuant to W.S. section 17-19-821 (2007).

It is the policy of the WMEA that no person, other than an authorized officer of the Executive Committee, may audio or video-tape the meetings of the board without consent of the President. Any audio or video tape will be destroyed (erased) upon approval of the meeting minutes.

Minutes are a legal recording of the meeting. Minutes are not a recording of side conversations or a reminder document for leaders or board members. Minutes are to be approved at the next convened meeting of the board. As policy, the following guidelines are in place for the secretary or appointee responsible for recording the minutes.

Preparing to Take Minutes
Review previous minutes to identify the preferred format and depth of detail.
• If the secretary will not be present, determine before the meeting an appointee to be responsible for writing the minutes.
• Arrive in a timely matter to be set up and ready.
• Have adequate materials available to take complete notes.
• Sit where all conversation can be heard.
• Circulate a sign-in sheet to identify all attendees at the meeting, including guests.

Recording at the Meeting
The minutes shall encapsulate meeting discussions and actions taken.
Recording Practices:
• Record who is in the room (members, guests, etc.) As more people arrive, it should be noted either at the start of the minutes or throughout. Include the location of the meeting, including facility name, city and the date.
• Preferably, do not tape record minutes. However, if a recorder is used, or if a volunteer brings a recorder, it shall be noted in the minutes. Recordings shall be erased upon approval of the minutes at the next meeting.
• Record motions exactly as they are stated. If they are unclear, clarify before the vote is taken. All motions must be recorded in the minutes, no matter their outcomes. The name of the person making the motion and second is not necessary to record.
• Record the outcome of every motion – whether or not it was passed, amended, tabled, withdrawn or failed by a vote or for lack of a second.
• Lengthy discussions should not be recorded in detail.
• Self-serving remarks that protect the organization should be included.
• Record discussion points that benefit the organization. Items that reflect positively on the organization and confirm the mission.
• Note recesses or breaks. Also the time of the final adjournment.
• Note the date and location for the next meeting.
• Identify the name of the person recording the minutes at the bottom of the last page.
• Typos and errors are not acceptable in minutes; correct all mistakes prior to adopting the official legal document to be kept permanently.

Meeting Practices:
Questions of Order shall be deferred to the Secretary or designee.
• Procedural Rules are used to maintain order at all meetings.
• All persons must be recognized by the President before speaking.
• Time limits may be established for certain subjects.
• Rules of Order for motions and procedures should be adhered to at all times.

After the Meeting – Distribution, Retention
For greater accuracy, transcribe notes into official minutes as soon as possible.
• Regardless of the acting note-taker, the elected secretary must review the draft before distribution. Include the word “draft” on each page of the minutes in the footer or as a watermark so as not to be confused with the final approved copy.
• The name of the elected secretary shall be identified at the bottom of the last page with a signature line included. The secretary shall sign the minutes and that original copy shall remain on file in the archives, permanently.
• Distribute minutes within 30 days of a meeting. Distribute by U.S. mail, posting on a password-protected website or by e-mailing as a digital attachment. Save as a PDF file rather than a word processing file so that changes cannot be made to the original.
• Minutes are distributed to the entire board or committee, whether or not persons missed the meeting.
• Retain original in a minute book or secure archival file folder, include a copy for the reading file.
• Attachments are not recommended. If the President wants ancillary information distributed, do so separately from the minutes (do not attach) so additional information is not added to the legal document.
• Number the pages and use a footer or header to identify the association’s name and meeting date on every page.
• Upon approval of the minutes, discard any taped recordings as well as the note taking sheets used to create the minutes.
• Add a reference note on bottom of the last page indicating to whom the minutes are being distributed to and the date of distribution.
• (optional) Prepare an executive-summary of the minutes but keep it separate from the official minutes. The executive summary may include delegated work, deadlines and commitments or other relevant information for the Executive board.
WMEA Whistle Blower Policy
Approved September 13, 2008
Review Approval May 2, 2014

The Wyoming Music Educators Association is committed to high standards of ethical, moral and legal business conduct. In adherence to federal, state, and local laws and/or regulations, including business ethics policies, WMEA has voluntarily adopted a Whistleblower Protection Policy. Pursuant to this policy, any member who becomes aware of any violation of federal, state, or local law or regulation should immediately report the violation to the Executive Past President to allow the organization to investigate and, if applicable, correct the situation or condition. This policy provides an avenue for members to raise concerns and protect members from reprisals or victimization for reporting. This whistleblower policy is intended to offer protections if a member raises concerns regarding association member activities, including but not restricted to:

- unlawful activity;
- activities that are not in line with association policy;
- incorrect financial reporting; or
- any other activities that constitute serious improper conduct.

Safeguards

Harassment or Victimization - Harassment or victimization will not be tolerated.
Confidentiality - Every effort will be made to apply appropriate regard for confidentiality as stated in the Confidentiality Policy.

Anonymous Allegations - This policy encourages members to put their names to allegations so that appropriate follow-up questions and investigation may take place. Such investigation may not be possible without the identified source of the information. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Bad Faith Allegations - Although the member is not expected to prove the truth of an allegation, the member should be able to demonstrate to the person contacted that the report is being made in good faith. If any member reports in good faith what the member believes to be a violation of the law and/or financial wrongdoing, it is the Association’s policy that there will be no retaliation taken against the member. Allegations made in bad faith may result in disciplinary action.
**Procedure: 1. Process for Raising a Concern**

*Reporting* - The whistleblower procedure is intended for serious and sensitive issues. Such concerns, including those relating to unethical or illegal conduct may be reported directly to the association Executive Past-President. If the Executive Past-President is involved in or is believed to be involved in the matter being reported, members may make a report to the Executive President-Elect. The Association will conduct an investigation and take appropriate action within a reasonable period of time and no more than 90 days. Such complaints will be held in confidence to the extent the needs of the investigation permit.

*Timing* - The earlier a concern is expressed, the easier it is to take action.

**Procedure: 2. How the Report of Concern Shall be Handled**

The action taken by association in response to a report of concern under this policy will depend on the nature of the concern. The Executive Committee shall receive information on each report of concern and follow-up information on actions taken.

*Initial Inquiries* - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

*Further Information* - The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

Members with questions concerning the confidentiality or appropriateness of disclosure of particular information should contact the Executive Past-President.
WMEA Written Information Security Policy
Approved, August 2, 2014

In order to protect our member’s privacy and personal information, WMEA has developed this Written Information Security Policy (WISP). This set of comprehensive guidelines and policies are implemented in compliance with standard practice for associations.

This WISP will be reviewed periodically and amended as necessary to protect the personal information of our association members, clinicians and vendors. WMEA has evaluated security risks and solutions in relation to the size, scope and nature of the association and the attendant risks of unauthorized access to or use of personal information.

OBJECTIVE
The objective of the Wyoming Music Educators Association in the development and implementation of this comprehensive written information security policy (WISP) is to create effective administrative, technical and physical safeguards for the protection of personal information of members, vendors and clinicians. The WISP sets forth our procedure for evaluating and addressing our electronic and physical methods of accessing, collecting, storing, using, transmitting, and protecting personal information of all concerned parties.

For purposes of this WISP, “personal information” is defined as:

- First name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such individual:
  - Social Security number.
  - Driver's license number or state-issued identification card number.
  - Financial account number.
  - Credit or debit card number, with or without any required security code, access code, personal identification number or password, that would permit access to a financial account.

- Personal information shall not include information that is lawfully obtained from publicly available information, or from federal, state or local government records lawfully made available to the general public.
PURPOSE
The purpose of the WISP is to better meet the following concerns:

- Ensure the security and confidentiality of personal information.
- Protect against any reasonably anticipated threats or hazards to the security or integrity of such information.
- Protect against unauthorized access to or use of such information in a manner that creates a substantial risk of identity theft or fraud.

SCOPE
In formulating and implementing the WISP, the Wyoming Music Educators Association has addressed and incorporated the following protocols:

- Identified reasonably foreseeable internal and external risks to the security, confidentiality, and/or integrity of any electronic, paper or other records containing personal information.
- Assessed the likelihood and potential damage of these threats, taking into consideration the sensitivity of the personal information.
- Evaluated the sufficiency of existing policies, procedures, personal information systems, and other safeguards in place to control risks.
- Designed and implemented a WISP that puts safeguards in place to minimize those risks.
- Implemented regular monitoring of the effectiveness of those safeguards.

DATA SECURITY COORDINATOR
The Wyoming Music Educators Association has designated the Past President to implement, supervise and maintain the WISP. This designated officer (Data Security Coordinator) is responsible for the following:

- Implementation of the WISP.
- Training of all board officers.
- Regular testing of the WISP’s safeguards.
- Evaluating the ability of any of our third party service providers to implement and maintain appropriate security measures.
- Reviewing the scope of the security measures in the WISP at least annually, or whenever there is a material change in our business practices containing personal information.
- Conducting an annual training session on the elements of the WISP for all board members who have access to personal information. All attendees at such training sessions are required to certify their attendance at the training, and their familiarity with our requirements for ensuring the protection of personal information.

INTERNAL RISK MITIGATION
To guard against internal risks to the security, confidentiality, and/or integrity of any electronic, paper or other records containing personal information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following
measures are mandatory and are effective immediately:

- We will only collect personal information of members, clinicians or vendors necessary to accomplish legitimate association transactions or to comply with any and all federal, state or local regulations.
- Access to records containing personal information shall be limited to those board members whose duties, relevant to their job description, have a legitimate need to access said records, and only for this legitimate association-related purpose (specified in section VII-D).
- Written and electronic records containing personal information shall be securely destroyed or deleted at the earliest opportunity consistent with association needs or legal retention requirements.
- A copy of the WISP will be distributed to each current board member and to each new board member on the beginning date they take office. Every officer shall have the responsibility for acknowledging in writing, by signing the attached sheet, that he/she has received a copy of the WISP and will abide by its provisions.
- All appointment contracts, where applicable, will be amended to require all appointees to comply with the provisions of the WISP and to prohibit any nonconforming use of personal data as defined by the WISP.
- Exiting officers, by end of term or resignation, must return all records containing personal data, in any form, in their possession at the time of exit. This includes all data stored on any portable device, and on any device owned directly by the exiting officer.
- The Data Security Coordinator or his/her designee shall be responsible for all review and modifications of the WISP and shall fully consult and apprise the President and Executive Director of all reviews including any recommendations for improvements arising from the review.
- The Data Security Coordinator or his/her designee shall ensure that access to personal information in restricted to approved and active user accounts.

EXTERNAL RISK MITIGATION

- Firewall protection, operating system security patches, system security software including, anti-virus, anti-malware, and Internet security and all software products shall be reasonably up-to-date and installed on any computer that stores or processes personal information.
- Personal information shall not be removed from the association premises in electronic or written form absent legitimate off-site business need and use of reasonable security measures, as described in this policy.

DAILY OPERATIONAL PROTOCOL

This section of our WISP outlines daily efforts to minimize security risks and to ensure that physical and computer files containing personal information are reasonably secured on behalf of our members, vendors and clinicians.

Recordkeeping: WMEA will only collect personal information of members, vendors and clinicians that is necessary to accomplish our legitimate association business transactions or to
comply with any and all federal and state and local laws.

Permanent Records: WMEA does not maintain personal, financial information in any form of permanent storage.
- Records containing personal information shall be assigned to an appropriate secured storage location, in the residence or office of the supervising officer, while in use.
- Financial information shall be used for a specific transaction and then redacted, expunged or otherwise eliminated in a manner consistent with the WISP.
- Any paper files containing personal information of members, vendors and clinicians shall be stored in a locked filing cabinet, in the residence or office of the supervising WMEA officer, for the duration of use.

Disposal of personal information:
- Paper documents containing personal information shall be either redacted or shredded as to ensure personal data cannot practicably be read or reconstructed.
- Electronic media and other non-paper media containing personal information shall be erased as to ensure personal information cannot practicably be read or reconstructed.

Authorized Users: Access to electronically stored records containing personal information shall be limited to those officers having a personal and unique login to access said records. The following officers are authorized to access and assign files containing personal information for identified purposes as contained in this WISP:
- President – member, vendor and clinician personal information.
- Executive Director – member, vendor and clinician personal information, members and vendor credit/debit cards and/or banking information.
- President-Elect – vendor credit/debit card and/or banking information.
- Membership Chair – member personal information.

Electronic Storage: Electronic records containing personal information shall be stored or transported on electronic device that are password protected. Personal information may only be transmitted electronically through encrypted data. The only exception shall be where there is no reasonable risk of unauthorized access to the personal information or it is technologically not feasible to encrypt the data as and where transmitted.

Third Party Service Provider: Any service provider or individual that receives, stores, maintains, processes, or otherwise accesses any file containing personal information must meet the accepted privacy standards for business practice.

Breach of Data Security
Board members are encouraged and invited to advise the Data Security Coordinator of any activities or operations that appear to pose risks to the security of personal information. If the Past President is him or herself involved with these risks, board members are encouraged and
invited to advise the WMEA President.

Should any officer or appointee know of a security breach of secured information, or that any unencrypted personal information has been lost or stolen or accessed without authorization, or that encrypted personal information along with the access code or security key has been acquired by an unauthorized person or for an unauthorized purpose, the following protocol is to be followed:

- Officer/appointee is to notify the Data Security Coordinator in the event of a known or suspected security breach or unauthorized use of personal information.
- The Data Security Coordinator shall be responsible for drafting a security breach notification to be provided to the Wyoming Attorney General’s office. The security breach notification shall include the following:
  - A detailed description of the nature and circumstances of the security breach.
  - The number of individuals affected at the time the notification is submitted.
  - The steps already taken relative to the incident.
  - Any steps intended to be taken relative to the incident subsequent to the filing of the notification.
  - Information regarding whether law enforcement officials are engaged in investing the incident.
WMEA Executive Board Written Information Security Policy

I understand my responsibility as a member of the WMEA Executive Board, to comply in all respects with WMEA Written Information Security Policy. If I become aware of a potential violation of this policy, I will immediately disclose all information to the WMEA President and/or Executive Director. I understand that, when in doubt, disclosure is recommended.

NAME (please print) ___________________________________________________________

BOARD POSITION ___________________________________________________________

TERM OF OFFICE _____________________________________________________________

SIGNATURE _______________________________ DATE _________

*Signed and dated copies of the Written Information Security Policy compliance statement for each member of the Executive Board remain on file with the WMEA Secretary during each term of office.*