

**RESOLUTION NO. 2020-26**

**RESOLUTION OF THE VILLAGE BOARD OF THE VILLAGE  
OF CALEDONIA: REVISED DESIGNATION OF “EMERGENCY RESPONDER”  
EMPLOYEES UNDER THE FAMILIES FIRST CORONAVIRUS RESPONSE  
ACT, REVISED COVID-19 EMPLOYMENT AND EMPLOYEE CONDITIONS  
POLICY, REVISED FAMILIES FIRST CORONAVIRUS RESPONSE ACT: PUBLIC  
HEALTH EMERGENCY FAMILY AND MEDICAL LEAVE POLICY ADDENDUM  
TO THE VILLAGE'S FMLA POLICY AND REVISED FAMILIES FIRST  
CORONAVIRUS RESPONSE ACT EMERGENCY PAID SICK LEAVE POLICY**

**WHEREAS**, on January 3, 2020, the World Health Organization declared COVID-19 to be a Public Health Emergency of International Concern namely the COVID-19 Pandemic, that has impacted the Village of Caledonia;

**WHEREAS**, on March 12, 2020, Governor Tony Evers declared a public health emergency to direct all resources needed to respond to and contain COVID-19 in Wisconsin;

**WHEREAS**, on March 13, 2020, President Donald Trump proclaimed a National Emergency concerning COVID- 19;

**WHEREAS**, on March 18, 2020, President Donald Trump signed the Families First Coronavirus Response Act (“FFCRA”), which expands the Family and Medical Leave Act (Emergency Family and Medical Leave Expansion Act), and creates a paid sick leave entitlement for certain eligible employees (Emergency Paid Sick Leave Act);

**WHEREAS**, because of such emergency conditions, the Governing Body was unable to meet with promptness and pursuant to Sections 323.11 and 323.14(4)(b) of the Wisconsin Statutes, as the chief executive officer of the Village of Caledonia, the Village President proclaimed a state of emergency in effect from March 18, 2020 until the Village Board could meet on the Proclamation attached hereto and incorporated herein as **Exhibit A** (the "Village President's Proclamation");

**WHEREAS**, by Resolution No. 2020-26 the Village Board ratified the Village's President's Proclamation, Extended the Declaration of Emergency, and ratified and approved the COVID-19 Employment and Employee Conditions Policy dated March 19, 2020, the Families First Coronavirus Response Act: Public Health Emergency Family and Medical Leave Policy Addendum to the Village's FMLA Policy dated March 31, 2020 and the Families First Coronavirus Response Act Emergency Paid Sick Leave Policy dated March 31, 2020; and

**WHEREAS**, the United States Department of Labor issued a Temporary Rule on April 1, 2020 under the Paid Leave under the Families First Coronavirus Response Act that requires revisions to the employment policies implemented by the Village.

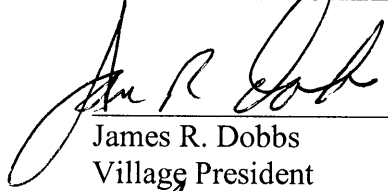
**NOW, THEREFORE BE IT RESOLVED**, the revised COVID-19 Employment and Employee Conditions Policy dated April ~~13~~<sup>MAY 14</sup>, 2020 attached hereto as **Exhibit A**, revised the Families First Coronavirus Response Act: Public Health Emergency Family and Medical Leave Policy Addendum to the Village's FMLA Policy dated April ~~31~~<sup>MAY 14</sup>, 2020 attached hereto as **Exhibit B**, and the Families First Coronavirus Response Act Emergency Paid Sick Leave Policy dated ~~April 31~~<sup>MAY 14</sup>, 2020 attached hereto as **Exhibit C**.

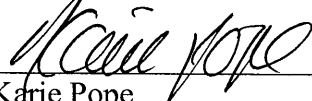
MARCH

**BE IT FURTHER RESOLVED**, the Village Administrator and the Village Assistant Administrator/Human Resources Director are authorized to implement and carry out the intentions of said policies.

Adopted by the Village Board of the Village of Caledonia at a duly noticed meeting, this 14<sup>th</sup> day of April, 2020.

**VILLAGE OF CALEDONIA**

  
\_\_\_\_\_  
James R. Dobbs  
Village President

  
\_\_\_\_\_  
Karie Pope  
Village Clerk

## MEMORANDUM

TO: All Employees

FROM: Toni Muise, Human Resources Director/Assistant Administrator

DATE: April 13, 2020

RE: Updated EFMLEA and EPSLA Policies

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The Village previously issued two new policies implementing the paid leave requirements of the Families First Coronavirus Response Act (FFCRA). The Final Regulations implementing the FFCRA were issued on Monday, April 6, 2020. Those regulations provided guidelines that have required the Village to make changes to the new Emergency Family and Medical Leave Expansion Act (EFMLEA) Policy and the Emergency Paid Sick Leave Act (EPSLA). I am enclosing the revised policies that should be considered effective on April 1, 2020. The Village is adopting these policies in order to comply with the recently enacted FFCRA, and in furtherance of our Village-wide effort to limit the spread of coronavirus among our employees and the general public while maintaining staffing and availability of emergency responders to maintain public health, order, safety, and essential services.

Both policies entitle eligible employees to paid leaves of absence necessitated by the coronavirus. Please review the revised policies carefully, as they contain important information regarding eligibility, rights, and responsibilities for paid and unpaid leave. The rights and responsibilities identified in the policies reflect those that are established under the applicable provisions of the FFCRA and its implementing regulations. The benefits available under these policies take effect beginning April 1, 2020 and sunset on December 31, 2020. Please note that, unless you are notified of revisions to other Village policies they will remain in full force and effect.

If further guidance on the FFCRA is issued by the appropriate governmental agencies, we may again be required to make changes to these policies. We will provide you with any such changes.

**For those classified as Emergency Responders:**

For full-time employees who are classified as emergency responders and exempted from the EFMLEA and EPSLA provisions of the FFCRA and who are eligible to earn paid sick leave under the Village's current personnel policies, the Village will provide up to 80 hours of additional paid leave to be used during the first fourteen calendar days by those emergency responders who are unable to work (or telework) due to the following reasons:

- i. The employee is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
- ii. The employee has been advised by a health care provider to self-quarantine due to concerns related to COVID-19;
- iii. The employee is experiencing symptoms of COVID-19 and seeking a medical diagnosis;

The Village may follow up with an employee requesting such leave to obtain additional information and to advise the employee of other benefits available including FMLA benefits to run concurrently where permitted. The employee may also use his or her own paid leave.

Emergency responders may request this leave either orally or in writing, including by email to the Assistant Village Administrator. This Emergency Responder Sick Leave expires on June 30, 2020, unless extended by written notice by the Village Administrator but not to exceed December 31, 2020. The Village may also eliminate eligibility for this benefit at any time, particularly if the Village choose to modify exemptions of employees for EPSLA benefits. This paragraph regarding this added Village-provided emergency responder sick leave benefit does not apply to employees covered by a collective bargaining agreement unless agreed to by the collective bargaining representative and Village.

Please direct all related inquiries to me. I am happy to discuss these policies and how they may affect your unique circumstances.

## **FFCRA Emergency Family and Medical Leave Expansion Act Policy** **Addendum to the Village of Caledonia's FMLA Policy**

The Emergency Family and Medical Leave Expansion Act ("EFMLEA"), an amendment to the federal Family and Medical Leave Act ("FMLA"), is part of the Families First Coronavirus Response Act ("FFCRA"). The goal of the EFMLEA is to allow for use of up to twelve weeks of federal FMLA leave during the COVID-19 crisis and until December 31, 2020. The law permits an eligible employee to take EFMLEA leave when the employee is unable to work (or telework) because the employee needs to care for the employee's son or daughter (under 18 years of age) because the child's school or place of care has been closed, or the child care provider of such son or daughter is unavailable due to a public health emergency.

The Village endeavors to provide and maintain a safe and healthy workplace and is equally committed to complying with all applicable laws. Accordingly, the Village has established this EFMLEA Policy Addendum to our FMLA policy to ensure that employees are informed of their rights and responsibilities as they relate to leave provided under the EFMLEA. Leave under the EFMLEA provides one additional reason for leave protected under the FMLA. There is variance between some provisions of the EFMLEA and the FMLA however, so we recommend careful review of this Policy. Should you have any questions about this Policy, please contact Toni Muise, Assistant Administrator/Human Resources Director.

### **A. ELIGIBILITY AND REQUESTS FOR LEAVE**

Employees who have been employed by the Village for at least 30 calendar days and who are eligible under this Policy may be entitled to leave under this Policy. Eligible employees with a qualifying need related to a public health emergency, as described in Section B below, may be eligible for up to 12 weeks of EFMLEA leave. This 12-week entitlement, however, will be reduced by FMLA leave otherwise taken in the FMLA leave year by an employee under the Village's FMLA Policy.

Eligible employees must provide the Village with notice of their need for leave under this Policy as soon as reasonably practicable but no later than the first day leave is required. Notice should be provided using the Village's required form and verification must be provided as indicated in Section D below. If the form is unavailable, then notice must be provided in writing, including via e-mail to Human Resources or the Village Administrator in the absence of Human Resources. The failure to provide notice of your need for leave may result in an unauthorized absence from work and leave may not be granted. Your requesting leave does not automatically mean it is granted. The Village will evaluate your request and notify you as to whether your leave is granted. Additional information may be required in evaluating your leave request if your initial request is not complete or adequate.

Employees who are classified as emergency responders are not eligible for leave or the benefits available under this policy, or the FFCRA pursuant to Section 3105 of the FFCRA. The Village has classified the following positions as emergency responders for purposes of this policy:

- Village Administrator
- HR Director/Assistant Administrator
- Finance Director
- Police Chief

- Deputy Chief
- Police Lieutenants
- Police Sergeants
- Police Officers
- Police Detectives
- All sworn law enforcement personnel
- Fire Chief
- Battalion Chiefs
- Fire Lieutenants
- Firefighters/Paramedics
- All firefighting personnel
- Utility Director
- Utility Operations Supervisor
- Senior Utility Field Operator
- Utility District Operators/Apprentices
- Public Works Director
- Highway Operations Supervisor
- Highway Lead
- Highway Operators
- Health Department personnel

The nature of the work performed by these employees, the possible need for additional staffing, and the exigent and dire circumstances that may exist when these employees are needed most necessitates their availability as emergency responders. The Village may amend this list of emergency responders at any time. This exemption does not impact an exempt employee's right to use earned or accrued paid leave under established policies of Village or under any current collective bargaining agreement.

## **B. QUALIFYING NEED RELATED TO A PUBLIC HEALTH EMERGENCY**

The EFMLEA entitles an eligible employee to seek leave when the employee is **unable to work (or telework)** due to a need to care for the son or daughter (under 18 years of age) of the employee, if the child's school or place of care has been closed, or the child care provider of such son or daughter is unavailable due to a public health emergency related to COVID-19.

Under this policy the term "telework" means work Village permits or allows an employee to perform while the employee is at home or at a location other than the employee's normal workplace. An employee will be considered to be able to telework if:

- (1) The Village has work for the employee;
- (2) The Village permits the employee to work from the employee's location; and,
- (3) There are no extenuating circumstances (such as serious COVID-19 symptoms) that prevent the employee from performing that work.

Telework may be performed during normal hours or at other times agreed by Village and Employee.

## **C. COMPENSATION AND BENEFITS DURING LEAVE**

Protected leave under this Policy may consist of a combination of both unpaid and paid leave periods. The first 10 workdays for which an employee takes leave under this Policy are unpaid. While not required, employees may elect to substitute any accrued paid leave benefits available to the employee to cover the first 10 workdays of unpaid leave, including but not limited to, any paid sick leave to which the employee is entitled under the Emergency Paid Sick Leave Policy. To substitute paid leave for the otherwise unpaid period, the employee must satisfy all requirements for taking the accrued leave.

Any leave under this Policy taken after two workweeks is paid as required by law. For each day of leave the employee takes after two workweeks, the employee will be required to use any accrued paid leave allowed for under Village policy and will be compensated in an amount equal to two-thirds of the employee's regular rate of pay multiplied by the number of hours the employee would normally be scheduled to work for any period of leave for which accrued paid leave is not available for use. In no event shall statutory pay while on EFMLEA leave exceed \$200 per day, and \$10,000 in the aggregate.

During an approved leave of absence under this Policy, the Village will continue to make available to the employee the same insurance benefits which are available to similar employees who are not on leave. The employee on leave will continue to have responsibility to contribute his or her portion of any employee-paid premium during leave. If the employee is paid during the leave period, then the premium will be deducted from the employee's pay. If the leave is unpaid, then the employee is responsible for arranging with Human Resources for the payment of his or her share of the premium during the period of leave.

Upon termination from employment, any remaining premium amounts due from the employee for unpaid coverage will be deducted from the employee's final check, if permitted by law. The failure to make timely premium payments may result in the loss of benefits.

No employee will lose any accrued seniority or benefits while on this protected leave.

## **D. VERIFICATION OF NEED**

To qualify for leave under the EFMLEA, an employee must provide information to the Village verifying the need for EFMLEA Leave. This information **must be provided in writing** and include the following:

- (1) the name and age of your child for whom you are needed to care,
- (2) the name of the school, place of care, or childcare provider that has closed or become unavailable; and
- (3) a representation that no other suitable person is available and caring for your son(s) or daughter(s) during the period.

Employees who wish to take a medical leave of absence for a serious health condition, for the employee or to provide needed care for an eligible family member, may seek leave under the Village's standard FMLA policy. This addendum would not be applicable to such leave. See the

FMLA Policy for the procedures for requesting FMLA leave under Village policy including certification requirements for FMLA leave.

## **E. RETURNING FROM EFMLEA LEAVE**

Where possible, employees on EFMLEA leave should provide the Village with at least 2 weeks' written notice of their intent to return to work. However, under no circumstances may an employee provide fewer than 2 workdays notice of their intent to return to work, if returning early. Any employee who returns from leave within 12 weeks, or the lesser amount of leave that was available to that employee due to other use of FMLA leave, will be reinstated to the same or an equivalent position with equivalent benefits, pay and other terms and conditions of employment. The Village cannot guarantee reinstatement to employees whose leave extends beyond 12 weeks in any 12-month period, except to the extent necessary to comply with applicable state or federal laws. An employee will not have any greater right to employment than he/she would have if FMLA leave had not been taken.

If due to economic conditions or other changes in the operating conditions of the Village a position no longer exists, the Village will make a reasonable offer to restore employee to equivalent employment; or if no such position exists, the Village will continue to consider the employee for equivalent employment that may arise for one year following the conclusion of leave.

## **F. NONDISCRIMINATION AND NO RETALIATION**

The Village strictly prohibits any form of discrimination or retaliation in the administration of this Policy. The requesting or taking of leave under this Policy will not be used against an employee in any employment decision, including in the determination of raises, employment opportunities, or discipline. Similarly, leave under this Policy will not serve as a negative factor or count against any employee for purposes of meeting the Village's attendance requirements.

It is unlawful for the Village to interfere with, restrain, or deny the exercise of, or the attempt to exercise, employees' rights established under the FFCRA, the EFMLEA, or this Policy. The Village will not retaliate against individuals because of their participation in or commencement of an action, proceeding, or investigation related to leave entitlement under the FFCRA or this Policy or for opposing any practice made unlawful by the FFCRA. An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer in such cases.

## **G. EXPIRATION OF BENEFIT**

In accordance with the EFMLEA, benefits pursuant to the EFMLEA and this policy expire on December 31, 2020.

## **H. QUESTIONS**

If you have any questions regarding the operation or interpretation of this Policy, please contact Toni Muise at [TMuise@caledonia-wi.gov](mailto:TMuise@caledonia-wi.gov).



## **Village of Caledonia**

### **FFCRA Emergency Paid Sick Leave Policy**

In response to the public health crisis created by the pandemic spread of the COVID-19 virus (“coronavirus”), the Families First Coronavirus Response Act (“FFCRA”) was signed into law effective March 18, 2020. As part of the FFCRA, the Emergency Paid Sick Leave Act (“EPSLA”), established paid sick leave entitlement for eligible employees during an absence for qualifying reasons, as set forth below.

The Village desires to provide and maintain a safe and healthy workplace and is equally committed to complying with all applicable laws. Accordingly, the Village provides paid sick leave benefits to eligible employees in accordance with the EPSLA until December 31, 2020 (“EPSLA leave”) This Policy is intended to provide employees with information regarding your rights and responsibilities as they relate to the paid sick leave afforded under the EPSLA. Should you have any questions about this Policy, please contact Village Human Resources Director/Assistant Administrator Toni Muise.

#### **A. EMPLOYEE ELIGIBILITY FOR EPSLA LEAVE**

Eligible employees may receive EPSLA leave benefits, regardless of their length of employment with the Village, provided that a qualifying reason for leave exists and is adequately communicated to the Village as soon as practical. EPSLA leave under this Policy is available for immediate use for any of the qualifying reasons identified in Section B.

Employees who are classified as emergency responders are not eligible for EPSLA leave or benefits available under this policy or the FFCRA pursuant to Section 5102 of the FFCRA. The Village has classified the following positions as emergency responders for purposes of this policy:

- Village Administrator
- HR Director/Assistant Administrator
- Finance Director
- Police Chief
- Deputy Chief
- Police Lieutenants
- Police Sergeants
- Police Officers
- Police Detectives
- All sworn law enforcement personnel
- Fire Chief
- Battalion Chiefs
- Fire Lieutenants
- Firefighters/Paramedics
- All firefighting personnel
- Utility Director
- Utility Operations Supervisor
- Senior Utility Field Operator
- Utility District Operators/Apprentices
- Public Works Director

- Highway Operations Supervisor
- Highway Lead
- Highway Operators
- Health Department personnel

The nature of the work performed by these employees, the possible need for additional staffing, and the exigent and dire circumstances that may exist when these employees are needed most necessitates their availability as emergency responders. The Village may amend this list of emergency responders at any time. This exemption does not impact an exempt employee’s right to use earned or accrued paid leave under established policies of Village or under any current collective bargaining agreement.

## **B. QUALIFYING REASONS FOR EPSLA LEAVE**

Employees may use EPSLA leave under this Policy and the FFCRA **if the employee is unable to work (or telework)** because of any of the following reasons:

- i. The employee is subject to a Federal, State, or local quarantine, isolation, or stay at home order related to COVID-19 and Village would otherwise have work available;
- ii. The employee has been advised by a health care provider to self-quarantine due to concerns related to COVID-19;
- iii. The employee is experiencing symptoms of COVID-19 and seeking a medical diagnosis;
- iv. The employee is unable to work or telework because the employee is caring for an individual who is subject to a Federal, State, or local quarantine, isolation, or stay at home order related to COVID-19 exposure, symptoms or at-risk status or has been advised by a health care provider to self-quarantine related to the same;
- v. The employee is unable to work or telework because the employee is required to care for the son(s) or daughter(s) of the employee because the school or place of care of the son or daughter has been closed, or the child care provider of such son or daughter is unavailable, due to COVID-19 and no other suitable person is available and providing such care; and
- vi. The employee is experiencing any other substantially similar condition specified by the Secretary of Health and Human Services.

EPSLA leave available under this Policy and the FFCRA may only be used for reasons permitted by this Policy and the law.

Under this policy, the term “telework” means work the Village permits or allows an employee to perform while the employee is at home or at a location other than the employee’s normal workplace. An employee will be considered able to telework if:

- (1) The Village has work for the employee;
- (2) The Village permits the employee to work from the employee's location; and,
- (3) There are no extenuating circumstances (such as serious COVID-19 symptoms) that prevent the employee from performing that work.

Telework may be performed during normal hours or at other times agreed by Village and Employee.

Under this policy and Section B(iv) above, "individual" means an employee's immediate family member, a person who regularly resides in the employee's home, or a similar person with whom the employee has a relationship that creates an expectation that the employee would care for the person if he or she were quarantined or self-quarantined. For this purpose, "individual" does not include persons with whom the employee has no personal relationship.

### **C. REQUESTING EPSLA LEAVE**

Employees must request EPSLA under this Policy in writing, including email if forms for that purpose are unavailable. Requests for EPSLA leave should be directed to Human Resources. An employee seeking such leave should notify the Village of the need for leave as soon as practical after the employee becomes aware of the need for paid sick leave but no later than the first workday (or portion of such workday) that the employee has need for EPSLA leave. Please note that leave will not be automatically granted because you make a request. Your request will be evaluated and you will be notified whether or not your leave is granted.

The notice to the Village and request for leave must contain the following information:

- (1) Employee's name;
- (2) Date(s) for which leave is requested;
- (3) Qualifying reason for the leave; and
- (4) Oral or written statement that the employee is unable to work because of the qualified reason for leave.

Additionally, the employee must also provide Village specific information for each reason specified above as follows:

- (1) For leave under B(i): the name of the government entity that issued the Order;
- (2) For leave under B(ii): the name and address of the health care provider who advised the employee to self-quarantine due to concerns related to COVID-19;
- (3) For leave under B(iv): either (1) the name of the government entity that issued the Order to which the individual being cared for is subject; or (2) the name and address of the health care provider who advised the individual being cared for to self-quarantine due to concerns related to COVID-19;
- (4) For leave under B(v):
  - (a) the name and age of the child(ren) for whom the employee is needed to care,
  - (b) the name of the school, place of care, or childcare provider that has closed or become unavailable; and

- (c) a representation that no other suitable person is available and caring for your son(s) or daughter(s) during the period.

The Village may follow up with an employee requesting such leave to obtain additional information and to advise you of other benefits available to you including FMLA and EFMLEA benefits. Your requesting leave does not mean it is automatically granted. The Village will evaluate each request and notify you whether the leave will be granted.

#### **D. DURATION AND USE OF EPSLA LEAVE**

Eligible full-time employees are entitled to no more 80 hours of EPSLA leave under this Policy. Eligible part-time employees are entitled to a number of hours equal to the number of hours that they work, on average, over a 2-week period. If your hours of work are variable, the average bi-weekly hours you worked over the prior 6 months will be used. Unused EPSLA leave will not carryover from one year to the next and such leave expires no later than December 31, 2020. On an employee's separation from employment, any rights to unused EPSLA leave expires and will not be paid out to the employee.

EPSLA for qualifying reasons related to COVID-19 must be taken in full-day increments unless an intermittent schedule related to leave to care for a son or daughter has been agreed upon by Village and the employee. Except for that limited agreement, once an employee begins taking EPSLA leave the employee must continue to take paid sick leave each day until the employee either (1) uses the full amount of EPSLA leave or (2) the employee no longer has a qualifying reason for taking the leave. This limit is imposed because if the employee is sick or possibly sick with COVID-19, or caring for an individual who is sick or possibly sick with COVID-19, the intent of FFCRA is to provide such EPSLA leave as necessary to keep the employee from spreading the virus to others.

#### **E. COMPENSATION DURING LEAVE**

When taking EPSLA leave under sections B(i)-B(iii) above, employees are entitled to receive their regular rate of pay as compensation during a period of absence. However, in no event shall such paid sick time pay exceed \$511 per day and \$5,110 in the aggregate.

When taking EPSLA leave under Sections B(iv) - B(vi) above, employees are entitled to receive two-thirds of their regular rate of pay as compensation during such leave. However, in no event shall such paid sick time exceed \$200 per day and \$2,000 in the aggregate.

The eligible employee receives an aggregate maximum of 80 hours total if full-time (i.e. scheduled for 40 hours or more), and the aggregate maximum is prorated downward for employees working less than 40 hours per week.

#### **F. EFFECT ON EXISTING POLICIES**

This Policy is not intended to replace any existing leave or paid time off policies maintained by the Village. EPSLA leave provided under this Policy is made available to eligible employees in addition to any leave or paid time off benefits provided under any of the Village's existing policies.

Eligible employees may first use EPSLA leave for any of the qualifying reasons identified in Section B above before using other accrued paid leave that may be available to the employee

under any of the Village's existing policies. The Village is prohibited by law from requiring employees to first use other unused and accrued paid time off benefits to which employees may be entitled under other existing policies prior to using EPSLA leave.

### **G. NONDISCRIMINATION AND NO RETALIATION**

The Village strictly prohibits any form of discrimination or retaliation in the administration of this Policy. The requesting or taking of EPSLA leave will not be used against any employee in any employment decision, including in the determination of raises, employment opportunities, or discipline. Similarly, taking EPSLA will not serve as a negative factor or count against any employee for purposes of meeting the Village's attendance requirements.

It is unlawful for the Village to interfere with, restrain, or deny the exercise of, or the attempt to exercise, employees' rights established under the EPSLA, or this Policy. The Village will not retaliate against individuals because of their participation in or commencement of an action, proceeding, or investigation related to paid sick leave entitlement under the EPSLA, or this Policy or for opposing any practice made unlawful by the EPSLA.

### **H. EXPIRATION OF BENEFIT**

In accordance with the EPSLA, the paid emergency sick leave benefits under the EPSLA, and in this Policy, expire on December 31, 2020.

### **I. QUESTIONS**

If you have any questions regarding the operation or interpretation of this Policy, please contact Toni Muise at [TMuise@caledonia-wi.gov](mailto:TMuise@caledonia-wi.gov).