

Policies

October 2026

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AMENDMENTS SUMMARY

Below is current information on relevant dates for the initial and amended Metro 4/SESARM policies:

Title	Dates of New and Revised Documents
General Policies	March 12, 2010 May 23, 2013 August 15, 2022
Asset Management Policies	September 20, 2005 November 30, 2009 March 12, 2010 August 15, 2022
Code of Ethics Policies	August 15, 2022
Conflict of Interest Policies	January 12, 2010 March 12, 2010 August 10, 2012 May 23, 2013 August 15, 2022
Expense Reimbursement Policies	September 20, 2005 March 14, 2006 November 28, 2006 November 30, 2009 March 12, 2010 August 15, 2022
Financial Management Policies	June 15, 2003 September 20, 2005 January 23, 2006 January 8, 2010 August 15, 2022
Nondiscrimination Policies	May 23, 2013 January 17, 2017 August 15, 2022
Office Administration Policies	September 20, 2005 March 14, 2006 November 30, 2009 March 12, 2010 August 10, 2012 August 15, 2022

Title	Dates of New and Revised Documents
Personnel Policies	September 20, 2005 March 14, 2006 November 30, 2009 March 12, 2010 August 10, 2012 August 15, 2022
Procurement Policies	September 1, 2003 December 30, 2004 February 25, 2005 September 20, 2005 November 30, 2009 March 12, 2010 August 15, 2022 October 28, 2025 October 27, 2026
Records Management Policies	March 5, 2010 March 12, 2010 August 15, 2022
Travel Policies	September 20, 2005 March 14, 2006 November 28, 2006 November 30, 2009 March 12, 2010 August 15, 2022
Whistleblower Policies	November 30, 2009 August 15, 2022

GENERAL POLICIES

The general policies of Metro 4 and SESARM consist of the following.

A. Metro 4 and SESARM have primary purposes of enhancing knowledge and capabilities of member agencies as the agencies maintain and improve, as necessary, Southeastern air quality.

B. Metro 4 and SESARM shall conduct administrative operations and provide agency support services in an efficient, effective manner that ensures integrity, credibility, transparency, and accountability. All staff, officers, directors, representatives, and member agencies, where applicable, shall comply with these policies and associated procedures.

C. Metro 4 and SESARM shall develop and maintain a Code of Ethics, applicable to staff, contractors, and representatives of the corporations.

D. Metro 4 and SESARM shall collaborate to develop, approve, and maintain joint governing policies to guide administrative operations and provision of support services to their member agencies.

E. Metro 4 and SESARM shall develop, maintain, and implement joint procedures consistent with these policies and with all federal statutes, regulations, and grant policies and conditions.

F. Metro 4 and SESARM shall comply with all federal grant management requirements applicable to recipients of grant funds including compliance with federal grant cost principles that all expenditures must be allowable, allocable, necessary, and reasonable, as defined by the granting authority.

G. These Metro 4/SESARM policies and associated procedures shall be periodically reviewed and updated as necessary.

H. All initial policies, and any subsequent policy additions, deletions, and/or amendments, shall be made available to, and approved by, the Metro 4 and SESARM Boards of Directors.

I. The Metro 4/SESARM Executive Director shall maintain a record of all policy amendments including the date of the revision and the version that the revision replaces.

J. The Metro 4/SESARM Executive Director shall be authorized and empowered to produce and update, as necessary, all procedures required to implement these policies and shall make available copies of all initial and revised procedures via website posting and/or electronic distribution to the Metro 4/SESARM membership.

K. Should any conflicts arise between these policies and corresponding procedures and the Metro 4 and/or SESARM corporate Articles of Incorporation and/or Bylaws, the hierarchy of authority shall be the Articles of Incorporation, the Bylaws, these policies, and the procedures.

ASSET MANAGEMENT POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Practice responsible control, management, and stewardship of all Metro 4 and SESARM assets;

B. Meet all asset management obligations required of a federal grant recipient;

C. Conform to this Asset Management Policy and the associated Asset Management Procedures;

D. Hold in trust, if required by the federal awarding agency, property that is acquired or improved with federal funds and use said property consistent with the purposes for which it was secured and for any other related uses consistent with the Metro 4/SESARM mission;

E. Safeguard all assets against loss, damage, and theft, utilize reasonable security measures, and implement protective operation and maintenance procedures in accordance with operator manuals and common usage standards for such assets;

F. Keep sufficient records to reflect purchase, retention, and disposition of assets purchased with federal funds; and

G. Conduct periodic inventorying of assets of substantive value.

CODE OF ETHICS POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Establish and enforce a Code of Ethics;

B. Ensure that all Metro 4/SESARM staff and other representatives of Metro 4/SESARM, while performing duties and tasks on behalf of Metro 4 and/or SESARM, conduct themselves in accordance with the Code of Ethics;

C. Include in the Code of Ethics high professional standards of conduct to be applied to all Metro 4/SESARM activities and processes;

D. Maintain objectives of credibility, professionalism, and high quality service;

E. Conform to principles of integrity, objectivity, competency, confidentiality, professional behavior, and technical expertise;

E. Respect the public interest as recipients of federal grant funds;

F. Respect and promote the reputation of member agencies;

G. Be committed to a high level of customer service to the member agencies and operate in their interest, not in the interest of any individual; and

H. Practice a philosophy of transparency and full disclosure of successes and challenges encountered in day-to-day operations.

CONFLICT OF INTEREST POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Protect the interests and integrity of Metro 4 and SESARM, member agencies, Boards of Directors, and staff through creation and enforcement of a Conflict of Interest Policy;

B. Prohibit any officer, Board of Directors member, employee, or other representative of the corporations from directly or indirectly conducting or influencing a corporate transaction or arrangement to the current and/or future personal benefit of the individual;

C. Prohibit any officer, Board of Directors member, employee, or other representative of the corporations from directly or indirectly conducting or influencing a corporate transaction or arrangement that creates a current or future conflict of interest;

D. Prohibit any officer, Board of Directors member, employee, or other representative of the corporations from directly or indirectly conducting or influencing a corporate transaction or arrangement in a manner that unfairly favors or disfavors any external individual or business;

E. Require that the officers, Board of Directors, employees, and representatives of the corporations function personally and professionally in a manner that maintains a high level of integrity, credibility, and public trust for the corporations;

F. Require that the officers, Board of Directors, employees, and representatives of the corporations promptly disclose any actual and potential conflicts of interest;

G. Require that all bidders and contractors for business with the corporations promptly disclose any actual and potential conflicts of interest; and

H. Require that all officers and Board of Directors members of Metro 4 and SESARM, and the Executive Director of Metro 4/SESARM, complete, sign, and submit a Conflict of Interest Certification Form at the conclusion of each fiscal year.

EXPENSE REIMBURSEMENT POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Establish and maintain a business expense reimbursement process that meets the definition of an "accountable plan" as described in IRS Publication 463 or any future successor to this publication;

B. Provide business expense reimbursement support to Metro 4/SESARM staff who incur such expenses while conducting their official duties;

C. Provide business expense reimbursement support to member agencies and member agency staff where any member agency has designated national or regional holdback grant funds to Metro 4/SESARM, said funds have been received as part of a grant award to Metro 4 and/or SESARM, there is an available balance in the agency subaccount, and the member agency chain-of-command has approved the usage of agency support funds to cover specific expenses; and

D. Provide business expense support for services including but not limited to event registration fees, travel, agency-sponsored workshop costs, instructional and certification costs, and other related expenses that help member agency staff attend and participate in training courses and other events designed to enhance the knowledge, abilities, and credentials of member agency staff.

FINANCIAL MANAGEMENT POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Operate in compliance with Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, currently promulgated at 2 CFR 200;

B. Conform to Generally Accepted Accounting Principles, as applicable, in its management of collective corporation finances;

C. Operate an accurate, accountable, and transparent financial management system;

D. Create as much separation of duties as practical, given the small staff, and utilize adequate checks and balances to ensure proper oversight of the handling of all Metro 4/SESARM funds;

E. Utilize funds in a responsible and fiscally conservative manner;

F. Manage expenditures, receipts, and reimbursements effectively, including maintenance of adequate documentation of receipts for all financial transactions; and

G. Conduct a fiscal year single audit as defined and prescribed currently in 2 CFR 200 for any fiscal year in which grant expenditures exceed the expenditure threshold that triggers the audit requirement.

NONDISCRIMINATION POLICIES

It shall be the policy of Metro 4/SESARM to:

A. Prohibit discrimination against their employees, customers, and applicants for employment based on race, color, national origin, age, handicap, or any other demographic category as prohibited by law; and

B. Require all staff, officers, Boards of Directors members, agents, and representatives to operate in conformance to these policies and associated procedures.

OFFICE ADMINISTRATION POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Operate Metro 4/SESARM administrative office(s) in a centralized or decentralized manner, consistent with direction from the Metro 4 and SESARM Boards of Directors, available funds, the most productive way to deliver services to the member agencies, and other related practical considerations;

B. Operate the Metro 4/SESARM office(s) in compliance with all applicable federal, state, and local statutes, regulations, and ordinances, and with all grant conditions;

C. Operate the Metro 4/SESARM office(s) in a cost-effective manner;

D. Maintain a constant focus on the priority needs of the member agencies;

E. Establish and maintain strong professional relationships and communications with member agency staff, U.S. Environmental Protection Agency (EPA) staff, regional and national multi-jurisdictional organizations, and other key colleagues and constituents; and

F. Provide periodic reports of services provided, progress on major tasks, and other pertinent information of interest to the Boards of Directors.

PERSONNEL POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Employ and maintain sufficient staffing and skills to meet the primary goals of Metro 4/SESARM and to deliver the priority services to the member agencies, subject to Boards of Directors approval and available funds;

B. Comply with all applicable federal, state, and local personnel statutes, regulations, and ordinances relative to hiring and employment;

C. Provide salaries and fringe benefits to employees that are consistent with current and anticipated future agency funding, as approved by the Metro 4 and SESARM Boards of Directors;

D. Ensure a safe and productive workplace;

E. Prohibit any form of discrimination or harassment in the workplace;

E. Prohibit Metro 4/SESARM staff or any other Metro 4/SESARM representative from using alcohol and/or illegal drugs, or prescription narcotic drugs in excess of prescribed dosages, in the workplace;

F. Prohibit Metro 4/SESARM staff or any other Metro 4/SESARM representative from arriving at the workplace at the beginning of the day or arriving at the workplace at any other time during the workday while under the influence of alcohol and/or illegal drugs, or impaired by prescription narcotic drugs in excess of prescribed dosages;

G. Promote reporting of illegal acts to appropriate authorities and/or the management and Boards of Directors and provide whistleblower protection to any staff person who does so;

H. Encourage and support professional development including provision of career development training, subject to available funds; and

I. Take necessary disciplinary action up to, and including, termination, where employee conduct and/or other job performance deficiencies are significant and documented.

PROCUREMENT POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Comply with all applicable statute, regulation, ordinance, and grant condition requirements related to procurements;

B. Comply with, Title 2, Part 200 of the Code of Federal Regulations (CFR);

C. Ensure that costs to be paid with grant funds are reasonable, allocable, allowable, and necessary, as those terms are defined in 2 CFR 200 Subpart E—Cost Principles;

D. Operate in a cost-effective manner, finding the best possible equipment, supplies, materials, and services at reasonable costs and within budget;

E. Minimize expenditures to the extent possible and avoid unnecessary procurements;

F. Evaluate procurement options for major goods and services including consideration of purchase, lease, and no procurement;

G. Require a formal procurement process for any procurement having a total expected value in excess of the simplified acquisition threshold, as specified in 2 CFR 200);

H. Require a simplified acquisition (informal) procurement process for any procurement having a total expected value in excess of the micro-purchase threshold but equal to or less than the simplified acquisition threshold, as specified in 2 CFR 200;

I. Develop and allow a micro-purchase (informal) procurement process for any procurement having a total expected value equal to or less than the micro-purchase threshold, as specified in 2 CFR 200;

J. As required and allowed by federal law and grant requirements, identify potential disadvantaged business enterprises (minority-owned and woman-owned) and encourage them to bid or otherwise provide price quotes for needed goods and services;

K. Establish and use a cost and price analysis process for informal and formal procurements;

L. Be objective when conducting procurements, provide fair and equal treatment to potential vendors, and ensure that no parties involved in Metro 4/SESARM procurement decision making have conflicts of interest;

M. Maintain adequate documentation of procurements in the Metro 4/SESARM files for a period of time consistent with the Records Management Policy, but no less than three years after the final closeout of the pertinent grant; and

N. Use purchased goods and services only for their intended purposes consistent with the mission of Metro 4/SESARM and never for personal gain.

RECORDS MANAGEMENT POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Manage, retain, and dispose of all active and inactive records in compliance with all applicable requirements including but not limited to federal and state statutes and regulations, grant conditions, and court orders;

B. Protect records from alteration and destruction when formal investigations, routine audits, or legal proceedings are anticipated, scheduled, or occurring;

C. Dispose of records when the record retention period has ended and the records are not otherwise of continued value to Metro 4 and SESARM, subject to available file space and resources for records purging;

D. Retain records as long as they are functionally useful to Metro 4 and SESARM;

E. Produce records for public review as required by applicable federal and state statutes and regulations and as necessary to promote and meet the needs of the member agencies; and

F. Designate the Metro 4/SESARM Executive Director as the official records custodian.

TRAVEL POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Manage with care travel reimbursement funds supporting Metro 4/SESARM staff travel as well as travel by member agencies participating in the Metro 4/SESARM agency support service;

B. Establish travel procedures for Metro 4/SESARM staff and Metro 4 and SESARM member agency staff, except that nothing in this Travel Policy shall be interpreted to preempt any local or state air pollution control agency travel requirements for member agency staff travel;

C. Require that travel by Metro 4/SESARM staff and member agency staff, where deemed necessary and approved by the applicable chain-of-command, shall be completed by the most economical means that is practical;

D. Prohibit requesting that Metro 4 and/or SESARM provide travel reimbursements for any travel expenses that would not be approvable for payment within the member agency;

E. Create and utilize reimbursement request forms that are as simple as possible for use by Metro 4/SESARM and member agency staff, but also accept member agency forms where prescribed by the member agency;

F. Create and utilize a reimbursement rate structure for various travel expenses and use it consistently, except where a member agency requests that its existing reimbursement rate structure be used; and

G. Require any personal expenses associated with business travel to be deducted from any affected cost category prior to requesting reimbursement from Metro 4/SESARM.

WHISTLEBLOWER POLICIES

It shall be the policy of Metro 4 and SESARM to:

A. Prohibit any officer, employee, contractor, subcontractor, or agent of Metro 4/SESARM from discharging, demoting, suspending, threatening, harassing, or in any other manner discriminating against an employee during the term of employment because of any lawful act of the employee;

B. Encourage provision of information regarding any conduct which the employee reasonably believes constitutes a violation of an applicable federal and/or state law or regulation;

C. Allow, without retribution, cooperation with any investigation or prosecution by a federal, state, or local regulatory or law enforcement agency, a member of a local or state legislative body or any committee thereof, or any person with supervisory authority over the Metro 4/SESARM employee including the Metro 4/SESARM Executive Director, the Metro 4 and/or SESARM Boards of Directors, or any such other person working for Metro 4/SESARM who has the authority to investigate, discover, and/or discipline for misconduct; and

D. Allow, without retribution, filing, causing to be filed, testifying, participating in, or otherwise assisting in a proceeding filed or about to be filed relating to an alleged violation of an applicable federal and/or state law or regulation.

CERTIFICATION AND SIGNATURE

This certifies that:

A. The Policies herein have been prepared for the exclusive use of Metro 4 and SESARM;

B. The Policies herein have been approved by the Metro 4 and SESARM Boards of Directors;

C. The Policies herein will be made available to all Metro 4/SESARM staff and the Boards of Directors;

D. The Policy requirements and expectations herein will be explained in adequate detail to other representatives of Metro 4/SESARM, where applicable, to ensure that all Metro 4/SESARM representatives comply with the Policies; and

E. The effective date of the Policies shall be the date of signature below:

Gregory P DeAngelo

Digitally signed by Gregory P DeAngelo
Date: 2026.11.17 13:14:21 -05'00'

Greg DeAngelo, Executive Director
Metro 4/SESARM