

# **Debt Disclosure Compliance**

#### Section A - Introduction

The school district shall operate consistent with its responsibilities under federal securities laws, including the continuing disclosure undertakings under Rule 15c2-12 of the Securities Exchange Act of 1934, as amended, and the statements of the Securities and Exchange Commission in enforcement actions. This policy is intended to address the requirements for debt issuers and federal agencies regarding financial disclosure compliance responsibilities.

#### <u>Section B - Disclosure Officer</u>

The Superintendent or designee shall be responsible for maintaining compliance with all disclosure requirements as outlined by federal securities laws and serve as the school district's Disclosure Officer.

The Superintendent or designee may enlist the assistance of an agent to perform disclosure activities, including the preparation of official statements, annual financial statements, and applicable reportable disclosures, subject to Board of Education approval.

## Section C - Official Statements

Whenever an Official Statement will be disseminated in connection with the issuance of obligations by the District, the Disclosure Officer will oversee the process of preparing the Official Statement. The Official Statement must then be approved by the Board of Education prior to publication.

## Section D - Annual Financial Information

The Disclosure Officer shall file the Annual Financial Information with EMMA (or confirm that such filing is completed by any agent hired by the school district for such purpose) within the time frame allowed for such filing.

#### Section E - Reportable Events

The Disclosure Officer will prepare (or hire an agent to prepare) a Reportable Event Disclosure and file the same with EMMA (or confirm that such filing is completed by an agent hired by the school district for such purpose) in a timely manner under applicable federal law.

## Section F - EMMA Notices

The Disclosure Officer will prepare (or hire an agent to prepare) all required EMMA notices. EMMA notices shall be prepared in the form required by the MSRB and shall be filed within the time frame allowed for such filings.

Approved: June 14, 2021