



## NOTICE OF MEETING

### MEMBERS OF THE BOARD OF TRUSTEES

The Gulf Coast Center Board of Trustees meeting for the month of December will be held on Wednesday, **January 27, 2021** at **3:00 p.m.**

Join the meeting by phone (audio only) United States:

**Phone Number: +1 (646) 749-3112**

**Access Code: 745-266-421**

Thanks,

Cathy Claunch-Scott

Secretary to the Board of Trustees

cc: January Board of Trustees File



10000 Emmett F Lowry,  
Suite 1220  
Texas City, TX 77591

409.763.2373

Toll Free- 1-800-643-0967

FAX 409.978-2401

[www.GulfCoastCenter.org](http://www.GulfCoastCenter.org)

*Better community healthcare promoting healthy living.*

**THE GULF COAST CENTER**

Regular Board of Trustees Meeting  
Wednesday, January 27, 2021 at 3:00pm  
Join the meeting by phone (audio only) :  
**Phone Number: +1 (646) 749-3112**  
**Access Code: 745-266-421**



**"Better community healthcare promoting healthy living."**

1. **Call To Order** .....Jamie Travis, Board Chair
2. **Citizens' Comments**
3. **Program Report: Audit Presentation**.....Eide Bailly, LLP
4. **Board Member Reports**
  - a. Texas Council of Community Centers ..... Jamie Travis, Board Chair
  - b. Texas Council Risk Management Fund. ....Mary Lou Flynn-DuPart, TCRMF Board Chair
5. **CEO Report**.....Melissa Meadows, CEO
  - Q1 FY21 Board Report
  - COVID Update
6. **Budget, Finance and Admin Reports** .....Rick Elizondo, CFO
  - a. Financial & Operational Monthly Report & YTD Summary **(Pg. 1-4)**
  - b. Sale of Property Update: Jones Building
  - c. Galveston County Transit District/Connect Transition Update
  - d. Corporate Compliance Annual Training & Report **(Pg. 5-9)**
7. **Consent Agenda**.....Linda Bell, JD  
**Consideration and Approval of Recommendations and Acceptance of Consent Agenda Items.** *(Consent agenda items may be pulled from this consideration for individual action or presentation.)*
  - a. Review and approval of December 9, 2020 Board Minutes. **(Pg. 10-13)**
  - b. Review and approval of the December 2020 Check Register.
8. **Action Items**.....Linda Bell, JD
  - a. Consider approval of the new agreement with **THE UNIVERSITY OF TEXAS MEDICAL BRANCH AT GALVESTON d/b/a UTMB Health** inpatient physician services for the expanded inpatient capacity (max of 4 overflow beds) related to Private Psychiatric Beds funding. Term: December 1, 2020-August 31, 2021. Amount not to exceed: \$20,325.00 (\$75/bed day)
  - b. Consider approval of the new Anti-Terrorism Policy and Procedure. **(Pg. 14-18)**

*If you need additional assistance to effectively participate in or observe this meeting, please contact (409) 763-2373 at least 24 hours prior to the meeting so that reasonable accommodations can be made to assist you.*

- c. Consider approval of the below Providers of substance use residential treatment services for the remainder of 2021.

	TRA-INTENSIVE	TRA-SUPPORTIVE
2021 Rate of Reimbursement	\$96.07	\$36.47
Alcohol/Drug Abuse Women's Center, Inc	\$161,000.00	\$10,000.00
BARC Medically Indigent Care	\$83,624.69	\$37,031.00
On the Pathway to Recovery	\$435,375.31	\$37,969.00

- d. Consider the approval of a decrease in the Center's mileage reimbursement rate from \$.575 cents/mile to \$.56 cents per mile effective January 1, 2021 for any mileage paid on or after this date. The revised rate is consistent with the IRS allowable mileage rate for use of personal vehicle, as well as the State of Texas Comptroller's travel policy, both which were revised effective January 1, 2021 to the \$0.56 cents per mile rate.
- e. Consider approval of the FY21 Amendment #4 to the HHSC IDD performance contract #HHS000608400001. This amendment adds \$65,298 for Enhanced Community Coordination services provided for the period January 1, 2021- August 31, 2021.
- f. Consider approval of the FY21 Amendment #1 to the HHSC Treatment Adult Services (TRA) contract #HHS000663700142. This amendment adds \$900,000 for residential substance use services for FY21 and \$1,300,000 per fiscal year from FY2022-FY2025.
- g. Consider approval of the Resolution by the Board of Trustees of the Gulf Coast Center approving the Goodman Corporation work order #30 to provide additional funding for the Gulf Coast Bi-County Transit District transition phase services including the hiring of Executive staff, in advance of the availability of direct federal grant funding for the GCTD. (\$120,000 federal funding)

9. **Pending or Revised Action Items**.....Linda Bell, JD

*Pending or revised items are those items which were on a prior board agenda but not completely resolved or there has been a revision since approval. The items may be listed for update purposes or final action by the Board.*

10. **Calendar**.....Jamie Travis, Board Chair

Due to Covid-19 all Board meetings shall occur virtually until further notice

Date	Event	Time
February 24, 2021	Board Meeting	TBA
March 24, 2021	Board Meeting	TBA
April 28, 2021	Board Meeting	TBA
May 26, 2021	Board Meeting	TBA
June 23-25, 2021	Texas Council Annual Conf	Austin
July 28, 2021	Board Meeting	TBA
August 25, 2021	Board Meeting	TBA

11. **Executive Session**

*As authorized by Chapter §551.071 of the Texas Government Code, the Board of Trustees reserves the right to adjourn into Executive Session at any time during this meeting to seek legal advice from its Attorney about any matters listed on the agenda.*

## **12. Adjourn**

The Gulf Coast Center  
 Fiscal Year 2021  
 Board Operational Budget Schedule

	FY 2021 Annual Budget Preliminary	FY 2021 Sep-20	FY 2021 Oct-20	FY 2021 Nov-20	FY 2021 Dec-20	FY 2021 YTD Actual YTD % of B 8%
<b>EXPENSES - OPERATING</b>						
Salary and Wages	14,911,571	1,187,382.08	1,192,754.37	1,186,715.84	1,198,759.04	4,765,611.33 32%
Fringe Benefits	5,332,392	501,290.87	512,913.01	510,865.27	508,958.40	2,034,030.55 38%
Travel	149,275	929.41	8,487.84	3,452.00	4,528.37	17,397.62 12%
Consumable Supplies	324,104	11,589.50	31,222.68	9,351.53	15,712.06	67,975.77 21%
Pharmaceutical/Laboratory	302,500	23,500.00	4,006.56	25,605.54	51,824.97	104,937.07 35%
Capital Outlay - Furniture/Equipment/Facilities	4,050,712	46,311.31	24,084.05	25,138.28	138,882.88	234,416.52 6%
Facilities - Rent/Maintenance/Utilities	1,122,117	102,183.88	89,214.06	108,581.15	112,283.10	412,262.19 37%
Other Operating Expenses	2,132,951	154,483.00	305,954.32	230,480.99	234,173.63	925,091.94 43%
Client Support Costs	468,347	51,486.06	30,118.63	30,353.10	36,007.36	147,965.15 32%
Consultant/Professional Providers	6,753,636	468,865.39	620,779.44	582,710.54	582,004.73	2,254,360.10 33%
<b>TOTAL EXPENSE</b>	<b>\$ 35,547,605</b>	<b>\$ 2,548,021.50</b>	<b>\$ 2,819,634.96</b>	<b>\$ 2,713,257.24</b>	<b>\$ 2,883,134.54</b>	<b>\$ 10,964,048.24</b> 31%

	FY 2021 Annual Budget Preliminary	FY 2021 Sep-20	FY 2021 Oct-20	FY 2021 Nov-20	FY 2021 Dec-20	FY 2021 YTD Actual YTD % of B 8%
<b>REVENUES - OPERATING</b>						
Local Funds						
County Funds	985,733	80,296.97	82,514.82	83,000.51	83,466.38	329,278.68 33%
Patient Fees Insurance/Reimbursement	551,672	51,556.67	37,167.56	47,261.31	41,722.99	177,708.53 32%
Miscellaneous Local Income	303,825	11,812.44	8,826.15	17,825.18	11,389.12	49,852.89 16%
Earned/Grant Income	1,841,230	143,666.08	128,508.53	148,087.00	136,578.49	556,840.10 30%
HUD - Transitional/Permanent Housing Recovery - Fee for Services / Grants	756,285	101,165.94	43,386.03	40,176.96	40,610.55	225,339.48 31%
Title XIX - Medicaid	1,221,638	95,750.97	104,534.31	97,179.61	87,178.73	384,643.62 31%
Transportation - Federal/State	2,393,600	210,743.49	194,940.00	161,184.55	183,173.76	750,041.80 31%
Medicaid 1115 Waiver/Misc Federal	7,536,818	367,061.23	697,482.47	424,053.23	647,105.74	2,045,702.67 27%
Other State/Federal Funds/MAC	3,572,072	345,504.88	380,146.07	365,273.09	427,667.87	1,518,591.91 43%
Performance Contract DSIS & DADS	1,611,115	79,669.83	84,390.24	81,766.03	81,576.58	327,402.68 20%
General Revenue - MH (Adult & Child & Veis) - 10%	17,091,528	1,199,896.34	1,414,879.12	1,169,633.47	1,467,313.23	5,251,722.16 31%
General Revenue - Regional Hospital	7,708,801	659,302.02	659,302.02	659,302.02	659,302.02	2,637,208.08 34%
General Revenue - NGM (Adult & Child)	4,082,246	340,187.16	340,187.16	344,495.16	345,131.16	1,370,090.64 34%
General Revenue - Crisis Services - 10%	1,125,427	65,671.04	65,671.04	65,671.04	65,671.04	262,684.16 23%
General Revenue/Permanent Plan - IDD	2,265,489	166,884.73	167,253.15	199,976.33	167,686.76	701,760.97 31%
Federal Block - MH (Adult & Child) and Crisis	1,432,892	86,054.31	95,882.65	138,791.20	124,709.54	445,437.70 31%
<b>TOTAL REVENUES</b>	<b>\$ 66,614,834</b>	<b>\$ 1,318,099.26</b>	<b>\$ 1,338,296.02</b>	<b>\$ 1,408,185.75</b>	<b>\$ 1,362,510.52</b>	<b>\$ 5,417,091.55</b> 32%
<b>SUBTOTAL OPERATING (Rev-Exp)</b>	<b>\$ 33,547,612</b>	<b>\$ 2,661,661.68</b>	<b>\$ 2,871,683.67</b>	<b>\$ 2,725,906.22</b>	<b>\$ 2,966,402.24</b>	<b>\$ 11,225,653.81</b>
<b>TOTAL OPERATING (Rev-Exp)</b>	<b>\$ 7</b>	<b>\$ 13,640.18</b>	<b>\$ 52,048.71</b>	<b>\$ 12,648.98</b>	<b>\$ 83,267.70</b>	<b>\$ 261,605.57</b>

<b>FUND BALANCE EXPENDITURES (NOT Inc. above)</b>						
<b>Flexible Spending</b>						
Flexible Spending - MH Adult						
Flexible Spending - IDD Services						
All Center Staff Recognition						
IDD Services - Community Support						
Connect Transit						
Connect Transit - Bercharia County						
Asset Management - Special Facility Projects						
Capital Projects - MIS Services						
Capital Projects - Major Facility/Equipment						
<b>SUBTOTAL FUND BALANCE EXPENSE</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

	FY 2021 Annual Budget Preliminary	FY 2021 Sep-20	FY 2021 Oct-20	FY 2021 Nov-20	FY 2021 Dec-20	FY 2021 YTD Actual YTD % of B 8%
<b>VARIANCE (REV-EXP) -</b>	<b>\$ 113,640.18</b>	<b>\$ 52,048.71</b>	<b>\$ 12,648.98</b>	<b>\$ 83,267.70</b>	<b>\$ 261,605.57</b>	

**The Gulf Coast Center**  
**FY2021 Monthly Board Financial Review**

Unaudited as of 12/31/2020

**Fiscal Year 2021 Unaudited Centerwide General Fund Balance Status**

Total General Fund Balance as of 08/31/2020 (Unaudited).....				\$	(7,023,033)
FY2021 Year-to-Date Reported Expense and Revenue Totals (Unaudited)					
	Expenditures	Operational	10,964,048		
		Non-Operational	-		
		Fund Balance	-	10,964,048	
	Revenues	Operational	11,225,654		
		Non-Operational	-	11,225,654	\$ 261,606
<b>Total General Fund Balance Year-to-Date (Unaudited).....</b>					<b>\$ (7,284,639)</b>

**Board Committed Use General Funds (Fiscal Year Committed)**

Capital Projects - Facility (FY2008-FY2011)	(200,000)				
Capital Projects - Facility (FY2013)	(100,000)				
Capital Projects - Facility (FY2014)	(100,000)				
Capital Projects - Facility (FY2015)	(150,000)	(550,000.00)			
fy2008-fy2018 Expenditure		439,153.86			
fy2020 Expenditure		-			
fy2021 Expenditure		-			
					(110,846)
Capital Projects - IT (FY2003-FY2014)	(600,000)				
Capital Projects - IT (FY2015)	(150,000)				
Capital Projects - IT (FY2017)	(140,000)	(890,000.00)			
fy2003-fy2018 Expenditure		744,020.18			
fy2020 Expenditure		-			
fy2021 Expenditure		-			
					(145,980)
IDD Community Service Support (FY2011-2014)	(300,000)				
IDD Community Service Support (FY2016)	(100,000)				
IDD Community Service Support (FY2018)	(100,000)	(500,000.00)			
fy2005-fy2019 Expenditure		471,531.85			
fy2020 Expenditure		-			
fy2021 Expenditure		-			
					(28,468)
Connect Transit (FY2015) LJ Urban	(320,000)	(320,000.00)			
fy2016-fy2017 Expenditure		-			
fy2018 Expenditure		-			(320,000)
Connect Transit (FY2013) General Services	(422,869)	(422,869.00)			
fy2015-fy2018 Expenditure		300,000.00			
fy2020 Expenditure		122,869.00			
fy2021 Expenditure		-			
Major Facility Repairs (FY2014)	(186,940)	(186,940.00)			
fy2014-fy2018 Expenditure		186,940.00			
fy2020 Expenditure		-			
fy2021 Expenditure		-			
Flexible Spending Supports (FY2004-2013)	(500,000)				
Flexible Spending Supports (FY2018)	(100,000)	(600,000.00)			
fy2005-fy2019 Expenditure		517,663.44			
fy2020 Expenditure		-			
fy2021 Expenditure		-			
					(82,337)
<b>Total General Fund Balance Year-to-Date (Unaudited)</b>					<b>\$ (7,284,639)</b>
<b>Unrestricted Use General Fund Balance (Unaudited)</b>					<b>\$ (6,597,008)</b>

2

The Gulf Coast Center

FY2021 Monthly Fund Balance Report

Unaudited as of 12/31/2020

Fiscal Year 2021 Unaudited Centerville General Fund Balance Status												
Total General Fund Balance as of 08/31/20 (Unaudited).....												\$ (7,023,033)
FY2019 Monthly Reported Expense and Revenue Totals (Unaudited)												
	September	October	November	December	January	February	March	April	May	June	July	August
Operational Expenses:	2,548,021	2,819,635	2,713,257	2,883,135	-	-	-	-	-	-	-	-
Non-Operational Expenses:	-	-	-	(111,000.00)	-	-	-	-	-	-	-	-
Fund Balance Expenses:	2,548,021	2,819,635	2,713,257	2,772,135	-	-	-	-	-	-	-	-
Total Expenses:	2,548,021	2,819,635	2,713,257	2,772,135	-	-	-	-	-	-	-	-
Operational Revenues:	2,661,662	2,871,684	2,725,906	2,966,402	-	-	-	-	-	-	-	-
Non-Operational Revenues:	-	-	-	(111,000.00)	-	-	-	-	-	-	-	-
Fund Balance Revenues:	2,661,662	2,871,684	2,725,906	2,855,402	-	-	-	-	-	-	-	-
Total Revenues:	2,661,662	2,871,684	2,725,906	2,855,402	-	-	-	-	-	-	-	-
Net increase/decrease in	113,640	52,049	12,649	83,268	-	-	-	-	-	-	-	-
Fund Balance												
Total General Fund Balance:	(7,136,673)	(7,188,722)	(7,201,371)	(7,284,639)	(7,284,639)	(7,284,639)	(7,284,639)	(7,284,639)	(7,284,639)	(7,284,639)	(7,284,639)	(7,284,639)
Total Unrestricted Fund Balance	(6,447,477)	(6,501,091)	(6,613,740)	(6,597,008)								
Avg. Cost per day:	84,934	87,994	88,801	88,959	70,935	59,632	50,953	44,663				
DAYS OF OPERATION OF TOTAL FUND BALANCE												
	September	October	November	December	January	February	March	April	May			
DAYS OF OPERATION OF UNRESTRICTED FUND BALANCE	84	82	81	82								
	76	74	74	74								

# ISF - HEALTH PLAN

	<u>MONTHLY</u> <u>FY2021</u> <u>BUDGET</u>	<u>MONTHLY</u> <u>FY 2021</u> <u>December</u>	<u>ANNUAL</u> <u>FY 2021</u> <u>BUDGET</u>	<u>YEAR TO DATE</u> <u>FY 2021</u> <u>December</u>	<u>YTD</u> <u>Percent</u> <u>Variance</u>	<u>YTD</u> <u>Dollar</u> <u>Variance</u>
<b><u>REVENUES:</u></b>						
Employer Contributions:	\$0.00	\$273,059.26	\$0.00	\$1,087,863.79	0	(\$1,087,863.79)
Employee Contributions:	\$0.00	\$30,060.38	\$0.00	\$120,183.36	0	(\$120,183.36)
<b>Total Revenue:</b>	<b>\$0.00</b>	<b>\$303,119.64</b>	<b>\$0.00</b>	<b>\$1,208,047.15</b>	<b>0</b>	<b>(\$1,208,047.15)</b>
<b><u>EXPENSES:</u></b>						
Medical Claims:	\$0.00	\$207,011.03	\$0.00	\$649,811.73	0	(\$649,811.73)
Pharmaceutical Claims:	\$0.00	\$0.00	\$0.00	\$61,334.94	0	(\$61,334.94)
Stop-Loss Premiums:	\$0.00	\$53,310.96	\$0.00	\$207,285.88	0	(\$207,285.88)
Administration Fees:	\$0.00	\$0.00	\$0.00	\$38,508.61	0	(\$38,508.61)
<b>TOTAL EXPENSES:</b>	<b>\$0.00</b>	<b>\$260,321.99</b>	<b>\$0.00</b>	<b>\$956,941.16</b>	<b>0</b>	<b>(\$956,941.16)</b>
<b>EXCESS OF REVENUES OVER EXPENSES</b>	<b>\$0.00</b>	<b>\$42,797.65</b>	<b>\$0.00</b>	<b>\$251,105.99</b>	<b>0</b>	<b>(\$251,105.99)</b>





# Gulf Coast Center

## Corporate Compliance Annual Report

Fiscal Year 2020

Submitted by:  
Cindy Kegg, Corporate Compliance Officer  
Gulf Coast Center  
January 2021

**Gulf Coast Center  
Corporate Compliance Annual Report  
Fiscal Year 2020**

Gulf Coast Center's continued commitment to reducing the risk of improper, unethical or unlawful conduct during FY 2020 is demonstrated through the strategies and expectations set forth in the Compliance Plan and Business Code of Conduct. The collective dedication of all to engage in honest and responsible conduct is paramount to organizational integrity and remains a clearly conveyed expectation throughout the Center. This report reflects key components of the Center's compliance program with corresponding activities of FY 2020, as well as comparison figures from FY 2002 through FY 2020 where indicated. The report also includes a summary of accomplishments from the Federal fiscal year (October 2019 – September 2020) as reported by the Office of Inspector General (OIG) and the Department of Justice (DOJ).

**Corporate Compliance Training**

Compliance education, including associated procedures, laws and expectations, is an essential component of the Gulf Coast Center's overall compliance strategy and is achieved through regular, ongoing training. Mandatory compliance training is required of all staff to help ensure that an acceptable level of knowledge is maintained throughout the organization. Training is typically offered twice monthly during New Employee Orientation (NEO) for both new hires and existing staff. Due to the public health emergency created by the emergence of COVID-19 and the subsequent safety guidelines issued by the CDC, in-person training ceased in mid-March 2020. All subsequent trainings were accomplished utilizing the Corporate Compliance & Rights Protection video developed by the Compliance Officer and General Counsel. Two hundred and twenty-seven individuals completed compliance training during FY 2020, with 60 percent attending live training between September 2019 and March 2020 and the remaining 40 percent viewing the video. An additional 65 eligible staff<sup>1</sup> completed the *Corporate Compliance and Rights Protection Exemption Test* with a passing score of 80 percent or better. Confirmation of training/test completion is maintained by both Human Resources and the Compliance Officer.

**Compliance Reports / Investigations**

The Center's Compliance Officer received four reports during FY 2020. All incidents were related to unauthorized disclosures and impacted a total of 18 individuals. The violations were the result of human error and pertained to either an improper authorization or information being released to the incorrect person or entity. Three incidents impacted only one individual with a single incident impacting 15 individuals.

The below table denotes the number and type of compliance concerns reported to the Compliance Officer since the initiation of the compliance program in FY 2002.

---

<sup>1</sup> 1) have been employed with the Center at least 5 years (60 months); 2) have not been the subject of a compliance investigation; and 3) have not caused a payback of greater than \$50

(Numbers in parenthesis represent incidents resulting in a refund. For example: 2 (1) reads 2 investigations, 1 of which resulted in a refund. Similarly, the *Medicaid Refund* column denotes in parenthesis the number of incidents responsible for the refund for that fiscal year).

FY	Confidentiality	Billing/ Documentation	Credentials	Fraud Allegations		Contract/ Other	TOTAL	Medicaid Refund
				Unconf.	Conf.			
2002	0	2 (1)	2 (1)	0	0	2	6	\$9,821.31 (2)
2003	1	3 (1)	3 (1)	0	0	1	8	\$3,654.20 (2)
2004	11	2 (1)	0	3 (1)	1 (1)	0	17	\$15,437.36 (3)
2005	14	2	0	0	1 (1)	0	17	\$17,699.55 (1)
2006	8	3 (1)	0	1 (1)	0	0	12	\$12,471.46 (2)
2007	11	3 (2)	0	0	0	0	14	\$14,994.33 (2)
2008	5	0	0	0	2	0	7	(0)
2009	5	2	0	0	3 (3)	0	10	\$27,672.28 (3)
2010	4	0	0	3 (3)	1 (1)	0	8	\$22,168.46 (4)
2011	7	0	0	0	0	1	8	(0)
2012	22	2 (1)	0	1	0	1	26	\$46.76 (1)
2013	18	1	0	0	1 (1)	2	22	\$275.22 (1)
2014	22	0	0	0	0	0	22	(0)
2015	18	2	0	0	0	0	20	(0)
2016	111	1	0	0	0	0	112	\$2,585.28 (1)
2017	25	0	0	0	0	0	25	(0)
2018	18	0	0	0	0	0	18	(0)
2019	16	0	0	1	0	0	17	(0)
2020	4	0	0	0	0	0	4	(0)
<b>Total</b>	<b>320</b>	<b>23</b>	<b>5</b>	<b>9</b>	<b>9</b>	<b>7</b>	<b>373</b>	<b>\$126,826.71 (22)</b>

### Annual Compliance Survey

The annual *Corporate Compliance Survey* was distributed to all staff in September 2020. The survey serves as a follow-up to the FY 2020 compliance training and evaluates staff competency on basic compliance information. The survey further evaluates staffs' perception of the compliance plan through questions related to the successful resolution of reported concerns, if applicable, as well as management support. In addition, the survey provides another method for submitting compliance issues or concerns that were not previously reported. Although there was follow-up on a few submitted comments, none resulted in a compliance investigation. Overall, survey responses indicated that staff were both knowledgeable and satisfied with the way reported issues were addressed during FY 2020.

### Corporate Compliance Committee

The Corporate Compliance Committee meets regularly and continues to advise and assist the Compliance Officer with monitoring the compliance program and ensuring that the Center's compliance efforts are both effective and responsive to the needs of the organization. The committee convened quarterly during FY 2020 with meetings on September 17, 2019; December 17, 2019; March 17, 2020; and (virtually) June 16, 2020.

Committee membership remained constant during FY 2020 and reflects the major service areas:

Amy McMahan, Director of Behavioral Health Services, Brazoria County / Youth Behavioral Health

Casey Duty, Utilization Manager

Cindy Kegg, Corporate Compliance Officer/Rights Protection Officer

Donna Gordon, Director of Reimbursement Services

Jeanine McNulty, Chief Human Resources Officer  
Jerry Freshour, Director of Crisis & Community Outreach  
Melissa Hollman, Contract Manager/QM Supervisor  
Reggie Brumfield, Chief Information Officer  
Sandy Patterson, Director of Behavioral Health Services, Galveston County  
Timothy Ornelas, IDD Crisis Intervention Specialist

In addition to addressing and responding to any specific concerns identified during the quarterly meetings, the committee routinely reviews the following:

- Compliance reports and incidents
- Compliance investigations
- Business Code of Conduct Violations
- Overpayments / refunds / fee collection
- Audit findings
- Quality Management activities
- Drug and alcohol testing (Connect Transit and other Center programs)
- Licensure / website verifications / exclusion lists / background check issues
- HITECH Breach Notification issues
- The Compliance Plan, Compliance Procedures and Business Code of Conduct
- Risk and Compliance Annual Assessment
- MIS Security Risks/Education

### Fiscal Audit

The Center's Annual Financial and Compliance Audit for the year ending August 31, 2020 was completed by Eide Bailey in January 2021. Although the final report had not been received by the date this Annual Compliance Report was submitted, per Chief Financial Officer Rick Elizondo, there were no federal or state compliance findings. The audit will be presented to the Center's Board of Trustees for review and approval at the January 27, 2021 Board Meeting.

### Compliance – A Federal Perspective

On December 2, 2020 the U.S. Department of Health and Human Services, Office of Inspector General released the OIG's Semi-Annual Report to Congress<sup>2</sup> covering April 1, 2020– September 30, 2020. The report highlighted the achievements of the 2020 Federal fiscal year (October 1, 2019 through September 30, 2020) and included the below accomplishments:

- more than \$4 billion in expected investigative and audit recoveries identified during fiscal year 2020;
- 624 criminal actions against individuals or entities that engaged in crimes that affected HHS programs;
- 791 civil actions, which include false claims and unjust-enrichment lawsuits filed in federal district court, civil monetary penalty settlements, and administrative recoveries related to provider self-disclosure matters;

<sup>2</sup> Inspector General Act of 1978 (Public Law 95-452), as amended, requires that the OIG report semiannually to the head of the Department and the Congress on the activities of the office during the 6-month periods ending March 31<sup>st</sup> and September 30<sup>th</sup>. Semiannual Reports describe OIG's work on identifying significant problems, abuses, deficiencies, and investigative outcomes relating to the administration of HHS programs and operations that were disclosed during the reporting period.

- exclusion of 2,148 individuals and entities from participation in federal health care programs, including Medicare and Medicaid.

On January 14, 2021 a press release from the *Office of Public Affairs* reported that the Department of Justice recovered over \$2.2 billion from False Claims Act cases in the fiscal year ending Sept. 30, 2020. According to the release, recoveries since 1986 when Congress substantially strengthened the civil False Claims Act now total more than \$64 billion. Accomplishments highlighted in the DOJ report include:

- Of the more than \$2.2 billion in settlements and judgments recovered by the Department of Justice this past fiscal year, \$1.8 relates to matters that involved the health care industry including drug and medical device manufacturers, managed care providers, hospitals, pharmacies, hospice organizations, laboratories, and physicians.
- Of the \$2.2 billion in settlements and judgments reported by the government in fiscal year 2020, \$1.6 billion arose from lawsuits filed under the *qui tam*<sup>3</sup> provisions of the False Claims Act. The number of such lawsuits has grown significantly since 1986 with 672 *qui tam* suits filed this past year – an average of almost 13 new cases per week. The government paid out \$309 million to individuals who exposed fraud and false claims by filing these actions.

### Conclusion

Although a compliance program may not entirely eliminate improper activities, a firmly established and effectively communicated commitment to compliance may significantly reduce the risk of improper, unlawful and unethical conduct within the organization. Through the expectations set forth in the Compliance Plan and Business Code of Conduct, the Center will continue to demonstrate a good faith effort to promote honest and responsible behavior by educating staff, conveying clear expectations of conduct, detecting errors and correcting identified problems. The Compliance Officer, Compliance Committee, General Counsel and Executive Management will continue to work collaboratively to support and maintain a compliance strategy that not only complies with applicable laws and regulations but also fosters an overall culture of compliance within the agency.

U.S.

---

<sup>3</sup> *Qui tam* provisions allow private citizens to file suits alleging false claims on behalf of the government. If the United States prevails in the action, the whistleblower, known as a relator, receives up to 30 percent of the recovery.

## THE GULF COAST CENTER

Regular Board of Trustees Meeting  
Wednesday, December 9, 2020 at 3:01 pm  
Join the meeting by phone (audio only) :  
**Phone Number: +1 (646) 749-3112**  
**Access Code: 745-266-421**



"Better community healthcare promoting healthy living."

### Minutes

- 1) **Call To Order**– Jamie Travis, Chair of the Board of Trustees, convened the regular meeting on Wednesday, October 28, 2020 at 3:01 p.m.

**The following Board Members were present:** Jamie Travis, Mary Lou Flynn-DuPart, Stephen Holmes, Rick Price, Wayne Mallia, Lt. Jaime Castro, Galveston County Sheriff's Department and Vivian Renfrow.

**The following Board Members were absent:** Lori Rickert, Excused and Caroline Rickaway, Excused

**Also present were:** Melissa Meadows, CEO – Gulf Coast Center, Barry Goodman-The Goodman Corporation and several Center staff.

- 2) **Citizens' Comments:** None

- 3) **Program Report:** Gulf Coast Center's IDD Crisis Intervention Specialist, TJ Ornelas, presented on a joint initiative with Brazoria County Sheriff's Office to utilize a video platform (Lifesize) to collaboratively serve persons with IDD who are in crisis. This initiative supports improved response time of the crisis worker through technology, provides the expertise of IDD crisis response to join a Mental Health Deputy, and ensures coordination of crisis care options are explored.

- 4) **Board Member Reports:**

- a. Texas Council of Community Centers: NONE
- b. Texas Council Risk Management Fund: NONE

- 5) **Operations Report:** Melissa Meadows, CEO, reported on the following:

- Homeless Point in Time Count: PIT Count is a single snapshot count of individuals who are homeless across the nation that occurs on January 28. This national effort provides opportunity for communities to educate, advocate, and engage on behalf of our homeless neighbors. Gulf Coast Center's Housing & Outreach Team are working with community partners and many volunteers to prepare for the event within our local community.
- 1115 Waiver Transition Update: The pending status of Texas HHS request to CMS was discussed, as well as efforts to achieve state-wide access of all community centers becoming Certified Community Behavioral Health Clinics and efforts to explore directed payment options for individuals with serious mental illness.

- CCBHC Application Process Update: Gulf Coast Center submission of the preliminary application to begin the CCBHC certification process was discussed, as well as our current focus to operationalize CCBHC initiatives.
- Legislative Update: High level summary of the recent legislative update provided by Texas Council was provided.
- COVID-19 Update: Chief Nursing Officer, Sarah Holt, provided a current update on precautions that remain in place for Center operations. Recent implementation of screening access for employees working off-site was introduced. Efforts to limit and monitor in-person activities will continue to ensure the health and wellness of all.

## 6. **Budget, Finance and Admin Reports:**

- a. Financial & Operational Monthly Report & YTD Summary: Rick Elizondo, CFO, provided a summary for the Month of October 2020 with revenues exceeding expenses by \$52,048.11 and Year to Date, surplus of \$165,688.89. The Fund Balance provides 74 days of operations unrestricted Fund Balance.
- b. Sale of Property Update: Jones Building and Mackey Building: Rick Elizondo, CFO, stated that the land swap at the Mackey building closed on December 14, 2020. For the Jones building the buyer has obtained all permits and funding and is awaiting approval from SBA and hopes to close soon.
- c. Galveston County Transit District/Connect Transition Update: Rick Elizondo, CFO, reported that Galveston County Transit District has hired an Executive Director and Finance Director and the projected separation date is April 1, 2021.

## 7. **Consent Agenda:**

**Consideration and Approval of Recommendations and Acceptance of Consent Agenda Items.**  
*(Consent agenda items may be pulled from this consideration for individual action or presentation.)*

- a. **Review and approval of October 28, 2020 Board Minutes.**  
 On motion by Mary Lou Flynn-DuPart, seconded by Vivian Renfrow, the board voted the approval of the October 28, 2020 Board Minutes. The motion carried with all members voting in favor.
- b. **Review and approval of November 18, 2020 Board Minutes.**  
 On motion by Mary Lou Flynn-DuPart, seconded by Vivian Renfrow, the board voted the approval of the November 18, 2020 Board Minutes. The motion carried with all members voting in favor.
- c. **Review and approval of October and November 2020 Check Register.**  
 On motion by Mary Lou Flynn-DuPart, seconded by Vivian Renfrow, the board voted the approval of the October and November 2020 check register. The motion carried with all members voting in favor.

## 8. **Action Items:**

- a. **Consider ratification of the new agreement with 24 Hour Translation for English-Spanish translation services. 24 Hour Translation was the selected best value responder from informal solicitation. Term: FY21; Rate: of \$0.087 per word.**  
 On motion by Jaime Castro, seconded by Mary Lou Flynn-DuPart, the board voted the ratification of the new agreement with 24 Hour Translation for English-Spanish translation services. 24 Hour Translation was the selected best value responder from informal solicitation. Term: FY21; Rate: of \$0.087 per word. The motion carried with all members voting in favor.
- b. **Consider approval of the new agreement with FORTI SECURITY & INVESTIGATION, LLC for an onsite security guard at the Park n Ride location at 1415 33rd Street Texas City, TX 77590. Term: November 23, 2020 to April 1, 2021. Amount: \$21.50/hr to \$24.50/hr (if marked car used)**  
 On motion by Mary Lou Flynn-DuPart, seconded by Vivian Renfrow, the board voted the approval of the new agreement with FORTI SECURITY & INVESTIGATION, LLC for an onsite security guard at the Park n Ride location at 1415 33rd Street Texas City, TX 77590. Term: November 23, 2020 to April 1, 2021. Amount: \$21.50/hr to \$24.50/hr (if marked car used). The motion carried with all members voting in favor.
- c. **Consider ratification of the FY21 Renewal Amendment with NAMI GULF COAST for MH family and consumer education, support and training services; and community education, training and partnerships. Amount not to exceed \$28,000. (No changes from FY20)**  
 On motion by Mary Lou Flynn-DuPart, seconded by Jaime Castro, the board voted the ratification of the FY21 Renewal Amendment with NAMI GULF COAST for MH family and consumer education, support and training services; and community education, training and partnerships. Amount not to exceed \$28,000. (No changes from FY20). The motion carried with all members voting in favor.
- d. **Consider ratification of the FY21 Renewal Amendment with THE ARC OF THE GULF COAST for family education and training services for individuals in the local communities. Amount not to exceed \$16,000. (No changes from FY20).**  
 On motion by Mary Lou Flynn-DuPart, seconded by Vivian Renfrow, the board voted the ratification of the FY21 Renewal Amendment with THE ARC OF THE GULF COAST for family education and training services for individuals in the local communities. Amount not to exceed \$16,000. (No changes from FY20). The motion carried with all members voting in favor.
- e. **Consider approval of the new agreement with SJ MEDICAL CENTER for Private Psychiatric Beds to expand inpatient capacity (overflow beds). Term: December 1, 2020-August 31, 2021. Amount not to exceed: \$162,600 (\$600/bed day)**  
 On motion by Mary Lou Flynn-DuPart, seconded by Vivian Renfrow, the board voted the approval of the new agreement with SJ MEDICAL CENTER for Private Psychiatric Beds to expand inpatient capacity (overflow beds). Term: December 1, 2020-August 31, 2021. Amount not to exceed: \$162,600 (\$600/bed day). This new agreement is for any beds over the 20 beds covered in a separate agreement, up to a maximum of 24 beds per day. Following discussion, the motion carried with all members voting in favor.
- f. **Consider approval of the FY21 professional service renewal agreement with Christopher L. Baker for social security representation and counseling services for individuals designated by GCC and specialized training for staff regarding social security benefits representation and counseling. Reimbursement: \$500 for full social security representations; \$500 for full training; \$100/mo for 8 hours of consultation; \$250 for small group refresher; and \$100 for 1:1 refresher. (no change from FY20)**



On motion by Mary Lou Flynn-DuPart, seconded by Vivian Renfrow, the board voted the approval of the FY21 professional service renewal agreement with **Christopher L. Baker** for social security representation and counseling services for individuals designated by GCC and specialized training for staff regarding social security benefits representation and counseling. Reimbursement: \$500 for full social security representations; \$500 for full training; \$100/mo for 8 hours of consultation; \$250 for small group refresher; and \$100 for 1:1 refresher. (no change from FY20) The motion carried with all members voting in favor.

**9. Pending or Revised Action Items: NONE**

*Pending or revised items are those items which were on a prior board agenda but not completely resolved or there has been a revision since approval. The items may be listed for update purposes or final action by the Board.*

**10. Calendar**.....Jamie Travis, Board Chair

Due to Covid-19 all Board meetings shall occur virtually until further notice

Date	Event	Time
January 27, 2021	Board Meeting	TBA
February 24, 2021	Board Meeting	TBA
March 24, 2021	Board Meeting	TBA
April 28, 2021	Board Meeting	TBA
May 26, 2021	Board Meeting	TBA
June 23-25, 2021	Texas Council Annual Conf	Austin
July 28, 2021	Board Meeting	TBA
August 25, 2021	Board Meeting	TBA

**11. Executive Session: NONE**

*As authorized by Chapter §551.071 of the Texas Government Code, the Board of Trustees reserves the right to adjourn into Executive Session at any time during this meeting to seek legal advice from its Attorney about any matters listed on the agenda.*

**12. Adjourn:**

There being no further business to bring before the Board of Trustees the meeting was adjourned at 3:33 p.m.

Respectfully,

Approved as to Content and Form,

\_\_\_\_\_  
Cathy Claunch-Scott

\_\_\_\_\_  
Jamie Travis

Secretary to the Board of Trustees

Board Chair



Handbook of Operating Procedures	
Policy 3.3b	
Section: Health, Safety, and Emergency Management	Responsibility and Oversight: General Counsel
Subject: Anti-Terrorism	Origination Date: December 11, 2020 Last Revision/Review:

I. **Title:** Anti-Terrorism

II. **Policy:** The Gulf Coast Center renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace terrorism and will make every effort to ensure that its resources are not used to facilitate terrorist activity.

III. **Definitions:**

**Terrorism** is the use of force or violence against persons or property in violation of the criminal laws of the United States for purposes of intimidation, coercion, or ransom.

Terrorists often use threats to:

- Create fear among the public.
- Try to convince citizens that their government is powerless to prevent terrorism.
- Get immediate publicity for their causes.

**Acts of terrorism** include threats of terrorism; assassinations; kidnappings; hijackings; bomb scares and bombings; cyber attacks (computer-based); and the use of chemical, biological, nuclear and radiological weapons.

IV. **General Guidelines for any terroristic event:**

1. Be aware of your surroundings.
2. Move or leave if you feel uncomfortable or if something does not seem right.
3. Take precautions when traveling to an unknown location or facility. Be aware of conspicuous or unusual behavior. Do not accept packages from strangers. Promptly report unusual behavior, suspicious or unattended packages, and strange devices to the police or security personnel (if available), facility safety officer, and manager onsite.
4. Learn where emergency exits are located in buildings frequented. Plan how to get out in the event of an emergency.
5. Be prepared to do without services normally depended on—electricity, telephone, natural gas, gasoline pumps, cash registers, ATMs, and Internet transactions.
6. Make sure to know where the following items are located at each work location:
  - Portable, battery-operated radio and extra batteries.
  - Several flashlights and extra batteries.

- First aid kit and manual.
- Protective gear such as gloves, hard hats and dust masks.
- Tape to rope off dangerous areas.

1. Know the identity, credentials and good standing of the partners and contractors (i.e. what they do, where they operate, who are their key decision makers and staff).
2. If a monetary transaction is involved, only transmit funds from GCC using reputable banks and other financial institutions for this purpose.

V. **Explosions.** Terrorists have frequently used explosive devices as one of their most common weapons. The materials needed for an explosive device can be found in many places including variety, hardware, and auto supply stores. Explosive devices are highly portable using vehicles and humans as a means of transport. They are easily detonated from remote locations or by suicide bombers. Conventional bombs have been used to damage and destroy financial, political, social, and religious institutions. Attacks have occurred in public places and on city streets with thousands of people around the world injured and killed.

a. If you receive a telephoned bomb threat, you should do the following:

- Get as much information from the caller as possible.
- Keep the caller on the line and record everything that is said.
- Notify the police and the building management and safety officer.

b. If there is an explosion, you should:

- Get under a sturdy table or desk if things are falling around you. When they stop falling, leave quickly, watching for obviously weakened floors and stairways. As you exit from the building, be especially watchful of falling debris.
- Leave the building as quickly as possible. Do not stop to retrieve personal possessions or make phone calls.
- Do not use elevators.

Once you are out:

- Do not stand in front of windows, glass doors, or other potentially hazardous areas.
- Move away from sidewalks or streets to be used by emergency officials or others still exiting the building.

If you are trapped in debris:

- If possible, use a flashlight to signal your location to rescuers.
- Avoid unnecessary movement to not kick up dust.
- Cover nose and mouth with anything available. (Dense-weave cotton material can act as a good filter. Try to breathe through the material.)
- Tap on a pipe or wall so rescuers can hear where you are.
- If possible, use a whistle to signal rescuers.
- Shout only as a last resort. Shouting can cause a person to inhale dangerous amounts of dust.

VI. **Biological Threats.** Biological agents are organisms or toxins that can kill or incapacitate people, livestock, and crops. The three basic groups of biological agents that would likely be used as weapons are bacteria, viruses, and toxins. Most biological agents are difficult

to grow and maintain. Many break down quickly when exposed to sunlight and other environmental factors, while others, such as anthrax spores, are very long lived. Biological agents can be dispersed by spraying them into the air, by infecting animals that carry the disease to humans, and by contaminating food and water. Delivery methods include:

- Aerosols—biological agents are dispersed into the air, forming a fine mist that may drift for miles. Inhaling the agent may cause disease in people or animals.
  - Animals—some diseases are spread by insects and animals, such as fleas, mice, flies, mosquitoes, and livestock.
  - Food and water contamination—some pathogenic organisms and toxins may persist in food and water supplies. Most microbes can be killed, and toxins deactivated, by cooking food and boiling water. Most microbes are killed by boiling water for one minute, but some require longer. Follow official instructions.
  - Person-to-person—spread of a few infectious agents is also possible. Humans have been the source of infection for smallpox, plague, and the Lassa viruses.
- a. In the event of a biological attack, public health officials may not immediately be able to provide information on what you should do. It will take time to determine what the illness is, how it should be treated, and who is in danger. While the appropriate GCC personnel will provide instructions once information is available, watch television, listen to radio, or check the Internet for official news and information including signs and symptoms of the disease, areas in danger, if medications or vaccinations are being distributed, and where you should seek medical attention if you become ill.

The first evidence of an attack may be when you notice symptoms of the disease caused by exposure to an agent. Be suspicious of any symptoms you notice, but do not assume that any illness is a result of the attack. Use common sense and practice good hygiene.

If you become aware of an unusual and suspicious substance nearby:

- Move away quickly.
- Wash with soap and water.
- Contact authorities and Centerwide Safety Officer.
- Listen to the media for updates and official instructions.
- Seek medical attention if you become sick.

If you are exposed to a biological agent:

- Remove and bag your clothes and personal items and follow official instructions for disposal of contaminated items as indicated in VII.b.3 below.
- Wash yourself with soap and water and put on clean clothes.
- Seek medical assistance. You may be advised to stay away from others or even quarantined.

- VII. **Chemical Threats.** Chemical agents are poisonous vapors, aerosols, liquids, and solids that have toxic effects on people, animals, or plants. They can be released by bombs or sprayed from aircraft, boats, and vehicles. They can be used as a liquid to create a hazard to people and the environment. Some chemical agents may be odorless and tasteless. They can have an immediate effect (a few seconds to a few minutes) or a delayed effect (2 to 48 hours). While potentially lethal, chemical agents are difficult to deliver in lethal concentrations. Outdoors, the agents often dissipate rapidly. Chemical agents also are

difficult to produce. A chemical attack could come without warning. Signs of a chemical release include people having difficulty breathing; experiencing eye irritation; losing coordination; becoming nauseated; or having a burning sensation in the nose, throat, and lungs. Also, the presence of many dead insects or birds may indicate a chemical agent release.

- a. The following are guidelines for what you should do to prepare for a chemical threat:
  - Check your disaster supplies kit to make sure it includes:
    - A roll of duct tape and scissors.
    - Plastic for doors, windows, and vents for the room in which you will shelter in place. To save critical time during an emergency, pre-measure and cut the plastic sheeting for each opening.
  - Choose an internal room to shelter, preferably one without windows and on the highest level.
  
- b. The following are guidelines for what you should do in a chemical attack.
  1. If you are instructed to remain in your home or office building, you should:
    - Close doors and windows and turn off all ventilation, including furnaces, air conditioners, vents, and fans.
    - Seek shelter in an internal room and take your disaster supplies kit.
    - Seal the room with duct tape and plastic sheeting.
    - Listen to your radio for instructions from authorities.
  
  2. If you are caught in or near a contaminated area, you should:
    - Move away immediately in a direction upwind of the source.
    - Find shelter as quickly as possible.
  
  3. Decontamination is needed within minutes of exposure to minimize health consequences. Do not leave the safety of a shelter to go outdoors to help others until authorities announce it is safe to do so. A person affected by a chemical agent requires immediate medical attention from a professional. If medical help is not immediately available, decontaminate yourself and assist in decontaminating others. Decontamination guidelines are as follows:
    - Use extreme caution when helping others who have been exposed to chemical agents.
    - Remove all clothing and other items in contact with the body. Contaminated clothing normally removed over the head should be cut off to avoid contact with the eyes, nose, and mouth. Put contaminated clothing and items into a plastic bag and seal it. Decontaminate hands using soap and water. Remove eyeglasses or contact lenses. Put glasses in a pan of household bleach to decontaminate them, and then rinse and dry.
    - Flush eyes with water.
    - Gently wash face and hair with soap and water before thoroughly rinsing with water.
    - Decontaminate other body areas likely to have been contaminated. Blot (do not swab or scrape) with a cloth soaked in soapy water and rinse with clear water.
    - Change into uncontaminated clothes. Clothing stored in drawers or closets is likely to be uncontaminated.
    - Proceed to a medical facility for screening and professional treatment.

- VIII. **Reporting Terrorist event.** Center employees and volunteers must report all Center emergencies IMMEDIATELY to appropriate Center personnel. Center staff to be notified should include the Centerwide Safety Officer, Chief Executive Officer, General Counsel, and/or the Program Manager/Director. In the event of a facility or vehicular emergency, employees and volunteers are to take immediate action to secure the situation first. At all times, employees and volunteers are to prioritize the safety of all facility and vehicular occupants, assure that appropriate emergency personnel are called, and that all reasonable efforts are made to minimize property and personal physical damage.
- IX. **Attachments**
- X. **Related Policies and Procedures**
- 3.1 Chronic Carrier Infections; Food Storage
  - 3.2 Infection Control and Bloodborne Pathogens Exposure
  - 3.3 Safety Management
  - 3.5 Active Shooter Guidelines
  - 3.6 Weapons Guidelines
- XI. **Additional References**
- <https://www.fema.gov/pdf/areyouready/terrorism.pdf>