Legal and Coverage Considerations for Law Enforcement “Off Duty” Employment

The Risk Pool occasionally receives inquiries from city officials, asking if coverage extends to police officers that work “off duty” as security guards. Allowing police officers to moonlight as security guards has both benefits and risks for cities. The primary benefit to the city is the increased police presence throughout the community – at no expense to the city. The downside is that allowing officers to engage in security work increases the likelihood that they will be required to respond to a crime while off duty, potentially increasing the number of claims and lawsuits against the city. Expenses arising from defending the individual officers are subject to the city’s deductible (if applicable) and included in the city’s loss experience.

The Risk Pool has no official position regarding whether a Member should allow off duty employment or not; the purpose of this article is to explain what coverage is available through the Risk Pool for Members and their officers if they are involved in off duty incidents.

Law Enforcement Liability Coverage

In order to be covered under the terms of the Risk Pool’s Law Enforcement Liability Coverage, the officer must qualify as a “Covered Party.” Covered Party is defined below, and the applicable provision states as follows:

PART VI LAW ENFORCEMENT LIABILITY COVERAGE

II. COVERED PARTIES

Each of the following is a Covered Party under this Part of the Liability Coverage Document to the extent set forth below:

D. Any employee of the Member or authorized volunteer, but only while carrying out their duties related to the Member’s law enforcement activities.

Although police officers often say they are on duty 24 hours a day, it is more accurate to say that their commission as peace officers imposes duties and grants authority to them to respond to certain criminal acts regardless of whether or not they are “on duty.” Police officers have a duty to “preserve the peace” within their jurisdiction as authorized by law (Texas Code of Criminal Procedure §2.13). That duty is not limited to their assigned shift during which they are paid by the city. Within their jurisdiction, officers have the authority and obligation to make arrests without warrants for various offenses enumerated in Texas Code of Criminal Procedure §14.03 (a) 1-6. An officer’s authority to make arrests without warrants outside of his or her jurisdiction is limited to felonies, assault, disorderly conduct or public intoxication that takes place in his or her presence Texas Code of Criminal Procedure §14.03 (d).
In short, although an officer may be off duty and working as a security guard, certain crimes committed in his or her presence trigger the officer’s duty to act as a police officer in the furtherance of his or her official duties. In those circumstances, the officer acts as a police officer and must comply with the policies established by the police department, not the policies of the private employer.

Look at it this way: Clark Kent enters a phone booth and becomes Superman when Lois Lane is threatened. Police officers are transformed from security guards to police officers (“off duty” to “on duty”) when crimes are committed in their presence.

Off duty police officers who respond to a felony or breach of peace in their presence would be acting as police officers and would qualify as a “Covered Party” if sued for false arrest or for use of excessive force because of their response to that crime. The same off duty police officer who, while working as a security guard, enforces a rule or regulation of the private employer (such as a dress code), would be acting for the benefit of the private employer rather than the city, and would not be considered a “Covered Party” for any resulting claims.

The above scenarios assume that the officer is within the city’s jurisdiction. It is questionable whether an off duty officer responding to crime outside of the city limits would be considered a “Covered Party.” Protecting persons and property outside the city limits is of no benefit to the city through which officers are commissioned, and not part of that city’s law enforcement activities.

If the city is sued because of an officer’s off duty activity, it will be covered (subject to the coverage provided and the provisions therein), regardless of where the incident takes place.

Workers’ Compensation Coverage
Under the terms of the Workers’ Compensation Interlocal Agreement, the Risk Pool provides workers’ compensation benefits as prescribed by the Texas Labor Code 504.001. In order to be entitled to workers’ compensation benefits, a police officer would have to be injured in the course and scope of his or her job duties on behalf of the Member. In determining course and scope of employment, the Risk Pool would use the same analysis as previously indicated for liability coverage. For example, if a police officer who is privately employed as a security guard at a high school football game is injured while responding to a brawl, he would be entitled to workers’ compensation benefits through the Risk Pool. The breach of the peace triggered the officer’s statutory obligation to preserve the peace. If the same officer simply slipped and fell on the stadium steps while patrolling the stadium, he or she would not receive workers’ compensation benefits from the Risk Pool because the officer was off duty and was not responding to a crime.

If an off duty officer is injured while responding to a crime outside of their jurisdiction, as authorized by Texas Code of Criminal Procedure 14.03 (d), the officer would not be covered for workers’ compensation benefits through the Risk Pool. The officer would not be considered a city employee because their actions are not for the benefit of the city for which they are regularly employed. Therefore, they would not be eligible for the city’s workers’ compensation benefits

continued on page 3
through the Risk Pool. Instead, they would be considered employees of the State of Texas, and thus, they would receive workers’ compensation benefits from the state Texas Labor Code §501.001 5 (c). Incidentally, there is no equivalent state statute providing liability coverage for officers sued for their actions while responding to crime outside of their jurisdiction.

**Conclusion**

Ultimately, coverage is determined based on the facts of each specific incident, analyzed in light of the applicable state law that defines the duties of a police officer. The Risk Pool routinely responds to members’ questions regarding coverage for off duty officers engaged in secondary employment. The standard response includes citations to the Texas cases upon which the Risk Pool bases its coverage determinations. If you have questions concerning the applicable state laws regarding off duty police officers’ working second jobs, please contact Ms. Myra Antell at 800-537-6655, extension 464.

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## Board of Trustees Update

At the July Board of Trustees meeting, the Board took action on several notable items, including:

- Adoption of the 2013-14 Budget;
- Merging of the Lifetime Benefits Fund into the Workers’ Compensation Fund; and
- Approval of a three-year contract with a Workers’ Compensation Payroll Auditing Firm.

In addition, the Board heard an update on the implementation of the Pool’s new claims system, received a report on the final property reinsurance placement, and received an update on a request for proposals for Property Reinsurance Intermediary Services.

### 2013-14 TMLIRP Budget Adoption

Three core objectives provide the foundation for the 2013-14 budget:

1. Retention of existing membership;
2. Growth in membership (not only by gaining new members, but also by adding or expanding coverage to meet the evolving needs of current members); and,
3. Identification of process improvements, leading to more efficient operations that become the basis for overall rate stability and service improvements for the membership.

The budget, as adopted, supports all of these objectives, with a major focus on enhancing the use of technology for both Pool Staff and Members. Carol Loughlin, Executive Director, stated, “This budget increases the Pool’s investment in technology, while working to keep other expenses in check. The investment in technology will take some time to implement and for the benefits to be seen, but that investment provides the infrastructure to support the budget’s core objectives.”

The budget is available online at [http://www.tmlirp.org/about/finance](http://www.tmlirp.org/about/finance).

### Merging of the Lifetime Benefits Fund into the Workers’ Compensation Fund

The Lifetime Benefits Fund (LBF) was originally created to provide the option for the Pool to create an annuity for death claims outside of the Workers’ Compensation Fund. The Board voted to merge the operations of the LBF into the Workers’ Compensation Fund to reduce administrative complexity, and to provide members with a clearer picture of the overall costs associated with death claims.

*continued on page 4*
Our city’s worker’s compensation coverage includes coverage for the mayor and council. They are not employees. Why would we cover them?

A Texas elected and appointed officials can be covered for statutory medical benefits under workers’ compensation coverage. Without such a benefit, public officials would have to use their own private health coverage for injuries suffered while performing their public duties. The cost to cover the mayor and council members is minimal, and it reduces the burden of public office.

Are special events covered by the Risk Pool?

A Claims related to bodily injury or property damage resulting from a member-sponsored event such as a parade, fireworks display or rodeo are addressed under the General Liability coverage. Special events are evaluated because they involve increased liability for the member. Any time the public gathers at a specific location for a city-sponsored activity that includes alcohol or motorized rides, there is a greater chance that someone could be injured. The Risk Pool asks that these special events be reported; and then, the Pool applies a charge based upon the city’s level of sponsorship. Craft fairs and summer recreation programs are generally not classified as special events. If the city’s only involvement is controlling traffic and managing street closings, that event is not a city-sponsored special event. Only when a city organizes and controls events, using city employees and volunteers, is the city considered the primary sponsor. For example, parades organized and managed by a city would be considered a special event to report.

If you are unsure what qualifies as a city-sponsored special event, please call your underwriter or member services manager.

The fire department has a beer and sausage fund raiser every year. Do we need to buy a liquor liability policy?

A No. Any member who has Pool General Liability coverage is already covered for liquor liability claims. While no claim outcome can be guaranteed in advance, the Pool would have a duty to defend and pay damages if the member were found to be legally liable for bodily injury or property damage related to the consumption of alcohol provided by that member. Each claim is evaluated based upon the facts of the situations, claimant allegations and the terms, conditions, and exclusions of the Liability Coverage Document.

We have the Fleet Automatic option on our autos. What is that?

A All Pool members participating in Automobile Liability have automatic liability coverage for vehicles they own. This coverage pays for bodily injury to others and damage to other vehicles or property when involved in an accident that is the fault of a member’s driver.
This means the Pool will only pay physical damage claims for these types of vehicles or newly acquired vehicles that fit within the designated type. How do you know which option you have chosen? If Fleet Automatic coverage is chosen, endorsement EL224 will be included with your Liability Declarations. Otherwise, the elected Designated Types are shown on the EL215 endorsement.

Q What happens if we have an accident with a vehicle that isn’t on our auto schedule?

A First, if the accident caused damage to another person or car, the Pool would respond under the Automobile Liability coverage. If there is damage to your vehicle as well, the claims department will review your automobile schedule to see if the vehicle is on your schedule. If it is not, then the Pool looks at coverage endorsements to see what coverage would allow the Pool to pay the claim. If Fleet Automatic coverage is selected and the vehicle was acquired during the fund year, the damage to your vehicle would be covered, and the Pool would add the vehicle to the schedule. If you purchased the vehicle prior to the current fund year and did not report it during the rate process, there would likely be no payment for the damage to the vehicle. If you have elected Designated Type coverage, damage to the vehicle will only be covered if the vehicle fits within your chosen type. Liability coverage would apply regardless.

Workers’ Compensation Small Deductibles

When most members think of workers’ compensation retention programs, they envision large deductibles applicable to large accounts. While the Pool does offer large deductible options, small deductibles are also available starting at $1,000 per claim.

The chart below illustrates small deductible options for a member that would pay a $50,000 annual contribution if there were no deductible.

With a small deductible, a credit is applied to the front side of the annual contribution. Members should compare the contribution credit to the average annual number of claims to evaluate the impact a small deductible might have on their overall cost of coverage. For members with low frequency of claims, a small deductible might be a good option. The election of a deductible does not affect the Pool’s claims handling procedures.

The only difference is that, at the end of each month, the Pool bills members for deductibles paid on their behalf during the previous month.

A small deductible is something worth considering in a tight budget year, or for a year in which your loss experience modifier causes an increase in contribution.

<table>
<thead>
<tr>
<th>Deductible</th>
<th>1,000</th>
<th>2,500</th>
<th>5,000</th>
<th>10,000</th>
<th>15,000</th>
<th>20,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deductible Credit</td>
<td>3,380</td>
<td>5,645</td>
<td>8,195</td>
<td>11,870</td>
<td>14,625</td>
<td>16,830</td>
</tr>
<tr>
<td>Net Contribution</td>
<td>46,620</td>
<td>44,355</td>
<td>41,805</td>
<td>38,130</td>
<td>35,375</td>
<td>33,170</td>
</tr>
</tbody>
</table>

For more information regarding workers’ compensation deductibles, contact your member services manager. He or she will be glad to help you analyze whether this option makes sense for your entity.
The Pool’s website has a new look. Check it out at tmlirp.org. There you will find the latest Pool news, financial information, the Membership Matters newsletter, and links to all Pool services.

Here are a few helpful tips for navigating around the new site.

• When logged in as a member, a box will appear in the left hand column that links members to their specific member services manager (formerly field services), underwriter, and loss prevention representative.

• If you need to register, simply click the “Register” link on the home page (upper right hand corner), fill in the form and submit. Once your Pool fund contact approves your registration, you may enter the site with full privileges. Your user name and password will be generated during this process.

One area that has proven particularly helpful to members is the “Coverage Services” area. Here are some of the time-saving tasks that you may now accomplish at this area:

• Download workers’ compensation, property or liability claims forms (which may be submitted via fax or email), or you may choose to file your property or liability claim online;

• Download routinely used underwriting forms, such as property change requests, schedule change requests, fund contact update form, volunteer activity reports and more.

Explore the site and let us know what you think! Email any comments or questions to – MembershipMatters@tmlirp.org.

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Make sure that you’re signed up for the new electronic version of Membership Matters. It’s easy. Just go to this web link: http://www.tmlirp.org/mmssubscribe. Fill out the simple form and click on “Submit.” That’s it. Once we receive your submission, you will automatically receive the newsletter each quarter – delivered straight to your email account. So, sign up today and never miss an issue!
Protect Your Hearing

Every day, we experience sound in our environment, such as sounds from television, radio, household appliances, work, and traffic. Normally we hear these sounds at safe levels that do not affect our hearing. However, when we are exposed to harmful noise or sounds that are too loud or loud sounds that last a long time, sensitive structures in our inner ear can be damaged, causing noise-induced hearing loss. These sensitive structures, called hair cells, are small sensory cells that convert sound energy into electrical signals that travel to the brain. Once damaged, these hair cells cannot be repaired. Although recent scientific research is making progress towards a cure, it is best to avoid excessive sound, which is one of the leading causes of hearing loss.

How do you know which noise is excessive? Sounds are measured in units called decibels. The following chart defines different sounds, their typical decibel levels, and the range of dangerous sound levels to avoid.

<table>
<thead>
<tr>
<th>Sound Description</th>
<th>Decibel Levels</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whisper</td>
<td>0</td>
</tr>
<tr>
<td>Residential Area at Night</td>
<td>20</td>
</tr>
<tr>
<td>Quiet Business Office</td>
<td>30</td>
</tr>
<tr>
<td>Conversational Speech (at 1 meter)</td>
<td>60</td>
</tr>
<tr>
<td>Vacuum Cleaner</td>
<td>70</td>
</tr>
<tr>
<td>Automobile (at 20 meters)</td>
<td>80</td>
</tr>
<tr>
<td>Heavy Traffic</td>
<td>90-100</td>
</tr>
<tr>
<td>Semi-trailers (at 20 meters)</td>
<td>100-105</td>
</tr>
<tr>
<td>Home Lawn Mowers</td>
<td>100-105</td>
</tr>
<tr>
<td>Die Forging Hammer</td>
<td>100-105</td>
</tr>
<tr>
<td>Gas Weld Whacker</td>
<td>100-105</td>
</tr>
<tr>
<td>Chain Saw</td>
<td>100-105</td>
</tr>
<tr>
<td>Pneumatic Drill</td>
<td>100-105</td>
</tr>
<tr>
<td>Rock Concert</td>
<td>110-120</td>
</tr>
<tr>
<td>Jet Aircraft During Takeoff (at 20 meters)</td>
<td>120-140</td>
</tr>
</tbody>
</table>

Noise-induced hearing loss is one of the most common causes of hearing loss for people of all ages. Recreational activities that pose hearing loss risks include listening to excessively loud music through personal music devices, all firearm shooting activities, woodworking, participation in a music band, and attending loud concerts. Harmful noises may also come from sources in everyday life, such as lawn equipment, shop tools, vacuum cleaners and heavy traffic.

These work areas could increase hazardous occupational noise exposure:
- Carpenter shops
- Places where electric generators are in operation
- Vehicle maintenance areas
- Machine shops
- Heavy construction equipment
- Areas in the immediate vicinity of airports
- Areas where pumps and motor-driven equipment operate
- Firing ranges
- Power generating plants
- Lawn maintenance equipment, especially gas powered
- Aircraft maintenance training areas

Once high noise level areas are identified, safety controls can be used to isolate or eliminate noise hazards. To protect employees, employers should establish administrative controls to implement changes to policies and procedures. Personal protective equipment, such as compressible foam ear plugs and ear muffs are two solutions to reduce harmful noise exposure. One thing to remember – ear plugs and muffs must be properly worn so that the entire circumference of the ear canal is blocked. An improperly fitted or dirty ear plug may not seal and can irritate the ear canal. Likewise, earmuffs will not seal around eyeglasses or long hair, and the adjustment headband tension must be sufficient to hold muffs firmly around the ear.

Baseline audiograms can help identify new employees with pre-existing hearing loss. Baseline and annual hearing tests can be used to detect early signs of hearing loss so that appropriate remedial action may be implemented.

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“Hearing” continued from page 7

Much can be done to prevent noise-induced hearing loss, but little can be done to reverse it. All individuals should understand the hazards of noise and how to practice good hearing health in everyday life.

Here are a few suggestions to protect your hearing and that of others:

• Know which noises can cause damage (those at or above 85 decibels, see chart on page seven)
• Be aware of hazardous noise in the environment when it occurs
• Wear properly fitted ear plugs or other hearing protective devices when involved in a loud activity or exposed to loud noise
• Share your knowledge of noise hazards with family, friends and co-workers
• Always protect children’s hearing
• Keep records of your hearing by having it periodically tested by a trained medical professional

Sources:
Texas Department of Insurance, Workers’ Health and Safety Publication on Hearing, “Conservation and Noise and Hearing Protection FactSheet”
Professional Safety, November 2010, “Can You Hear Me Now?”

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**Loss of Revenue, Extra Expense and Rental Value – the Pool Has You Covered!**

Fire, lightning, vandalism and many other perils can damage or destroy your assets. The Pool pays to repair or replace your damaged property according to the Pool’s property coverage agreement.

However, did you know there are other expenses the Pool covers that are related to covered property losses? These items are defined as **Coverage Extensions**. Coverage extensions are benefits that the Pool pays in addition to physical property damage. A schedule of coverage extensions and their limits is provided to members each year in the member’s rerate documents. An explanation of property coverage extensions may also be found in the TMLIRP Property Coverage Document – pages 9-14.

The most notable extensions are **Loss of Revenue**, **Extra Expense** and **Rental Value**. These extensions are designed to reimburse you for certain additional losses and expenses besides the actual physical damage to scheduled property.

For instance, **Loss of Revenue** provides coverage if your covered property damage keeps you from performing services that generate revenue (loss of business because your customers have experienced their own property damage is not a part of this extension).

**Extra Expense** provides coverage for additional costs associated with continuing operations while covered damaged property is being repaired or replaced. This might include the additional cost of renting temporary office space during the repair period.

**Rental Value** covers the reduction in rent if you have leased premises that cannot be occupied during repair.

As a standard Pool benefit, each property member is provided up to $25,000 for **Loss of Revenue**, **Extra Expense** and **Rental Value** (combined) at no additional cost. Higher limits may be purchased.

Is $25,000 enough for your operations? Lost revenue and additional operations costs incurred due to direct property loss can be expensive. The right amount of coverage for your operation depends on how long the recovery takes and the extent of the disruption.

To find out more about this helpful part of your coverage, or any of the Pool’s coverage extensions – contact your member services manager or underwriter.
Liability Issues of Donated Buildings

Governmental entities often find themselves on the receiving end of donated property and oftentimes accept these gifts that are couched as “free.” When considered through the risk management lens, however, these freebies can look expensive.

To protect itself against premises liability claims, a member must be able to demonstrate that reasonable care was exercised to protect individuals from harmful conditions of which the member had knowledge, or, should have had knowledge. Therefore, a member must perform due diligence to determine the condition of any property that it owns or may receive. Consider the following steps when assessing whether to accept donated property:

- Keep complete documentation of all inspections and maintenance records. Proving what has been done is as important as doing it. The Pool’s Loss Prevention Department has guidelines for its members concerning regular property inspections. They include simple checklists to help members focus on key areas, such as housekeeping, fire alarm/detection systems, means of egress, hazard identification, and general property condition.

- Establish a property donation acceptance procedure, which should include criteria regarding accepting donations. This will ensure consistency, and determine immediate and ongoing costs; plus, it will evaluate the suitability of the property for public use.

- Include the member’s risk coordinator and attorney early in the process to help identify and address liability concerns. Contact the Pool to discuss how the property addition may impact coverage or contributions before deciding whether to accept the donation.

Common concerns regarding accepting donated properties include the hazards associated with vacant properties and environmental hazards such as asbestos and underground storage tanks. Vacant or partially occupied buildings pose increased risks of damage caused by fire, natural elements, vandalism due to lack of maintenance, lack of utilities, and lack of security.

Though members may want to accept a donation with plans to modify the property, renovation or demolition of most properties is subject to state and federal asbestos regulations.

Although many uses of asbestos have been banned under Environmental Protection Agency and Consumer Product Safety Commission regulations, some materials remain legal for sale and use. The materials that are not banned include materials in which asbestos fibers are generally well bound in the material. Many flooring, insulation, and roofing products containing asbestos have not been banned. Do not assume that a donated property, regardless of age or condition, is free of asbestos. Contact the Texas Department of State Health Services for a list of certified property inspectors.

Contamination from underground storage tanks may also increase the member’s liability exposure. Conduct an assessment to determine if underground storage tanks are present and if removal or cleanup is required. Underground storage tank liability coverage is not part of the Pool’s coverage contract, and the member would need to purchase a separate policy that adds expense to the donation’s true cost or provide evidence of financial responsibility.

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Public Employee Dishonesty – Are You at Risk?

A terminated employee uses a stolen city credit card to purchase thousands of dollars in gasoline for his car and his friends’ vehicles. A housing authority employee pockets residents’ payments and deposits while still crediting the payments received account. Cash is stolen from a night deposit box that has limited access; however, proof of who took the cash cannot be determined.

These are just three examples of Public Employee Dishonesty claims that have been submitted to TMLIRP in the last five years. History has shown that when loss prevention controls are lax or non-existent, employees, under the right circumstances, can and sometimes do exploit opportunities. Sometimes, even the best internal controls cannot totally prevent theft, but they can greatly reduce the chances of such occurrences.

So, who commits these types of crimes? Actually anyone, at any level, is susceptible when the right circumstances are present. According to Donald R. Cressey, author of Other People’s Money: A Study in the Social Psychology of Embezzlement, three factors usually motivate ordinary people to commit fraud:

1. Pressure – fuel for the crime. The employee has some financial problem that he or she does not perceive to be resolvable through legitimate means.

2. Opportunity – support for the crime. The employee discovers an illegitimate means to solve the perceived financial problem. The most desirable opportunities are the ones with perceived low risk of detection.

3. Rationalization – justification for the crime. The employee is able to rationalize his or her actions as something other than criminal. Rationalization may use the following excuses:

   “I’m an honest person who is caught in a bad set of circumstances.”
   “I’m not hurting anybody.”
   “I’m not stealing – just borrowing.”

When all three of these factors are present at the same time, what is called the “Fraud Triangle” is in place. Now, the likelihood of this employee committing a crime to resolve a financial problem is very probable.

What can organizations do to deter theft? Organizations cannot control the pressure or rationalization elements of their employees; yet, they can control opportunity. The best way to control theft opportunities is to surround all operations with a good internal control structure. In a nutshell, an internal control structure affects every aspect of a business operation and supports these three major components: effectiveness and efficiency, financial reporting, and regulatory compliance.

TMLIRP has developed a resource that helps members understand, recognize and curtail public employee dishonesty exposures. Included in the resource is a PowerPoint presentation with exercises that help members learn how to identify susceptible employees and potential losses.

Also included in the resource is a template that assists members with developing site-specific loss prevention controls. The template has a checklist that asks a series of “Yes/No” questions that identify potential control weaknesses; plus; it contains a list of steps to take in the event of a public employee dishonesty situation. These steps will greatly aid in the claims handling process.

Despite the many news stories regarding recent theft in business, the good news is that most employees are honest and trustworthy. However, under the right set of circumstances, some employees would take advantage of opportunity. With forethought, established loss prevention controls, and working closely with TMLIRP, members can limit public employee dishonesty exposure and losses.
A good breakfast is instrumental for any great meeting.

See you October 10th!

Visit TMLIRP in booth 767 and TML IEBP in booth 761!

So, come on by for breakfast!

Each year, the Texas Municipal League Intergovernmental Risk Pool and Texas Municipal League Intergovernmental Employee Benefits Pool host a complimentary breakfast during the TML Annual Conference. Get your breakfast tickets during early registration.
TML
INTERGOVERNMENTAL RISK POOL
1821 Rutherford Lane, First Floor
Austin, Texas 78754
(800) 537-6655

Please Route

Membership Matters

Events Calendar

- October 8-11 . . . . . . . . . . . TML Annual Conference, Austin
- October 10 . . . . . . . . . . . . . TMLIRP and TML IEBP Annual Breakfast, Austin
- October 25-26 . . . . . . . . . . TMLIRP Board of Trustees Meeting, Grapevine
- January 24-25 . . . . . . . . . . TMLIRP Board of Trustees Meeting, San Marcos