

## Law Mandates Consumer Confidence Reports

By Alan P. Petrov

Effective September 18, 1998, the EPA adopted a new federal regulation mandating that water systems prepare Consumer Confidence Reports (CCR). The new requirement applies to every water system that sells potable drinking water to more than 15 customers, regardless of whether or not that system is owned by a city, district, corporation or private individual.

Water wholesalers are included under the regulation but their responsibility will only be to supply data and information to retailers if they have no end-use customers of their own.

The new federal requirement for the CCR stems from the adoption of the 1996 Safe Drinking Water Act Amendments. These amendments specify that all community water systems must provide customers an annual report on the quality of their drinking water.

Each CCR must contain, at a minimum, the following elements:

- 1) Information on the type and source of the water sold by the utility;
- 2) Definitions of certain terms, such as "maximum contaminant level (MCL) goal" and "maximum contaminant level";
- 3) Information stating if any regulated contaminant is detected in the water;
- 4) Information stating if a source water assessment has been completed and certain information relating thereto;
- 5) Language regarding specified health effects in the event an MCL has been exceeded during the prior year;
- 6) Information on levels of unregulated contaminants for which monitoring is required, including radon and cryptosporidium;
- 7) Educational information regard-

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## Use of 501 (c)(3) Organizations in Residential Projects

By Ryan J. Johannes

Of the various tax-exempt and non-profit organizational structures available under both state and federal statutes, section 501 (c)(3) of the Internal Revenue Code (the "Code") is unique in that it allows a nongovernmental organization, or corporate affiliate of a governmental entity, to maintain tax-exempt status while also allowing the organization to issue bonds for multifamily housing projects.

The ability of these bonds to generate tax-exempt interest for their holders is the key to their marketability in the financial world. To use of 501(c)(3) organization to issue bond for older projects can significantly lower the organization's carrying costs and enable it to offer attractive acquisition terms to owners of existing projects.

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## Strict Criminal Liability Applied to Open Meetings Act

By Alan P. Petrov

In late 1998, the Texas Court of Criminal Appeals upheld a criminal conviction of a school board president for violating the Texas Open Meetings Act (the "Act") in *Tovar vs. State*. For the first time, the court examined criminal liability under the Act and issued a decision effectively putting thousands of public officials throughout Texas on notice that they will have little excuse for violating the Act. Judge Morris Overstreet wrote for the court's opinion, "the Act places a duty upon members of a governmental body to hold open meetings and a... duty to find an exception to the rule if they desire to have a closed meeting.

Neglect of this duty will subject a member of the governmental body to criminal sanction."

Joseph Tovar, a former school board president in San Antonio, was indicted on two charges involving the Open Meetings Act. One indictment alleged that Tovar knowingly participated in a special closed meeting of the school board not permitted under the Act. The other indictment alleged that Tovar knowingly called, and aided in calling and organizing, a special closed meeting of the board not permitted under the Act.

Tovar argued in part that he should not be convicted because he did not know-

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# Duties, Responsibilities and Liabilities Of Non-profit Directors in Texas

By Andrew P. Johnson, III

*(Note: Second in a series on liability of individuals in community service. Next in the series: Potential Liability in the Issuance of Public Securities)*

In recent years, non-profit corporations have rapidly expanded the scope of available services. These corporations are no longer simply the traditional homeowner associations, churches and charities, but now have proliferated into services for the homeless, drug-abuse prevention, elderly care, nursing homes, low income housing, as well as facilitating the extension of services of local governments.

The directors of non-profits do not enjoy governmental immunity, as discussed in the last issue, for the actions and decisions made in the capacity of a director. As a director of a non-profit corporation, you can, however, find protection from personal liability by operating within the parameters set out in the Texas Non-profit Corporation Act ("Act").

And, since no standard of liability is stated for directors of most public non-profit corporations, such as housing finance corporations and health facility development corporations, it could be assumed that the standard of conduct to avoid liability for directors of these corporations is the same as for non-profits under the Act.

## What are my responsibilities?

In general, you learned all you need to know to avoid liability in Girl or Boy Scouts. As a director you must be trustworthy (act in good faith), loyal (to the corporation), and obedient (to the corporate documents and the law).

You can demonstrate these qualities by regularly attending meetings and making informed decisions. Directors should request any pertinent information necessary to make an informed judgment regarding board action before the meeting at which the action is

scheduled to take place. If a director does not believe that the information before him/her is sufficient, that director should either abstain from voting or ask that the vote be delayed.

Directors also have the responsibility of overseeing delegated activities, be they delegated to an individual or a board committee. A director may rely on information prepared or presented by (a) officers or employees of the corporation, (b) attorneys, accountants or other persons whom the director

*As a director of a non-profit corporation, you can find protection from personal liability by operating within the parameters set out in the Texas Non-profit Corporation Act.*

believes to have professional or expert competence, and/or (c) a committee of the board of which the director is not a member.

But the director may not rely on information if the director has actual knowledge to the contrary. A director should review thoroughly any information or advice on which he or she may rely.

## Duty of Fairness

To determine the "fairness" of a transaction involving a conflict of interest, the directors should evaluate whether (a) the terms of the transaction are as favorable to the corporation as those that might be made from an unrelated third-party, (b) a person without interest presented the transaction to the corporation, rather than an interested director, and/or (c) the corporation's

interest in negotiations has been represented by a disinterested person.

When a director has an interest in a transaction to which the corporation is a party, the director must disclose the existence of the interest and describe its nature to the other directors prior to the time the board takes any action on the matter. The director may be counted in determining a quorum, but may not, however, vote on the action.

## Loyalty

Directors must pursue the interests of the corporation rather than the interests of a director or of another person or organization. A director must not use his/her position to make a personal profit or gain other advantages.

## Corporate Opportunity

Directors may not divert business opportunities from the corporation to themselves. When an opportunity regarding the corporation's business activities comes to the attention of a director, that director must present the opportunity to the corporation. Only after the board decides not to pursue the opportunity may the director pursue the matter for personal benefit. The director should not take any action that would prejudice the corporation until the board has decided what action to take.

## Loans

Loans by the corporation to its directors are prohibited, and directors voting to approve a loan will be jointly and severally liable to the corporation for the amount of the loan.

## Confidentiality

The director should treat all information relating to the corporation as confidential until the information is determined to be a matter of public record. A possible exception is the applicability of the Texas Open Records

## Meet Johnson, Radcliffe & Petrov:

### *Ryan J. Johannes, Associate*

**R**yan J. Johannes joined the firm as Associate in 1998. His practice is concentrated in the areas of taxation, securities, real estate, administrative and municipal law, as well as estate planning.

Prior to joining JR&P, Mr. Johannes was with the legal department of the American General Corporation, where his responsibilities primarily were commercial real estate mortgages and leases.

Before working with American General, Mr. Johannes was with the legal department of the Oklahoma State Bureau of Investigation (OSBI). There his duties included representing OSBI in court at both the district and appellate levels, drafting new and

amended legislation and requests for attorney general opinions, as well as advising district and city attorneys, OSBI agents, sheriff and local police departments and local counsel on legal issues.

A native Texan, Mr. Johannes is a graduate of Oklahoma State University (B.S. 1986), Missouri Southern State College (B.S.B.A. 1992), and the University of Oklahoma College of Law (J.D. 1996). He is licensed to practice in both Texas and Oklahoma. Mr. Johannes has also completed the course work and is currently submitting his thesis for an LL.M. in taxation law from the University of Houston Law Center. ■

**PICTURE  
NOT  
AVAILABLE**

*Ryan J. Johannes*

## Non-Profit Directors CONT'D FROM PAGE 2

Act to housing finance corporations and other public non-profits. Even then, personnel, real estate, security and attorney-client privilege issues are restricted from public access under state law.

Directors of a non-profit corporation must act within the purposes set forth in the articles of incorporation, bylaws or applications for tax-exempt status as applicable. Failure to fulfill the corporation's purpose risks loss of tax-exempt status and dissolution by the attorney general.

### **How can I be liable?**

Directors of non-profit corporations may be held liable in three different situations:

- **Statutory Liabilities** – Directors may be liable by statute or regulation for the corporation's violation of applicable state and federal laws.
- **Breach of Duty** – Directors may be sued for breaching the duties and responsibilities of a non-profit director.
- **Third-party claimants** – Claimants who have suffered injury may seek damages from the directors individually. Usually, directors will not be held liable for the obligations of the corporation unless the corporate form has been disregarded or the directors profited in

a personal manner from the corporation's activities.

### **What do you have to prove?**

Expect for violations of law which have their own standard of proof, a person who wishes to establish the liability of a director has the burden of proving that the director has not acted in good faith, with ordinary care, in a way the director believes to be in the best interest of the corporation.

As shown in the Open Meetings article (See pg. 1), ignorance of the rules or your stated intent to "do the right thing" may not be a defense. The circumstances may be used against you, as we have seen with events in Washington, D.C.

### **Is there any other protection?**

Yes. First, buy director's and officer's liability insurance. If the policy allows you to select or consent to defense counsel, so much the better, as recent defendants have learned.

In addition, a corporation may indemnify a director if the director: (a) acted in good faith, (b) believed his/her conduct was in the best interest of the corporation, (c) in a criminal proceeding, had no cause to believe conduct was unlawful; (d) is not found liable to

the corporation; and (e) is not found liable on the basis that personal benefit was received by the director.

The corporation can make the indemnification provisions mandatory and may purchase insurance to protect against liability. It is always wise to have these provisions in place long before you need them. If the corporation purchases indemnification insurance for its directors, it must disclose to whom the money was paid and in what amount.

### **Conclusion**

Your best protection is a good mix of common sense, insurance and hiring the right professional advisors.

This is a summary of a paper delivered at the 1998 Texas Association of Local Housing Finance Agencies (TALHFA) Convention in Ft. Worth and the national Association of Local Housing Finance Agencies (ALHFA) Convention in Minneapolis by Andrew P. Johnson, III. A checklist for non-profit directors to avoid liability and full text of this article are available from JR&P. Please contact JR&P at 281/872-1221, use the fax-back page at the end of this newsletter or e-mail us at [apj@publiclaw.com](mailto:apj@publiclaw.com) for more information. ■

## 501 (c)(3) Organizations CONT'D FROM PAGE 1

### Tax-Exempt Bonds For Financial Housing Projects

Tax-exempt organizations may issue tax-exempt bonds on qualified residential housing projects, significantly increasing the marketability of the bonds. The primary advantage of using tax-exempt bond financing is its significant interest-rate savings; this enables developers to secure permanent financing with very low fixed-interest rate, non-recourse debt and long term affordability. Typically, 501 (c)(3) tax-exempt bonds have a tax-exempt rate that could be as much as 200 basis points below a similarly credit-enhanced market rate loan, although in today's interest rate environment, the differential could be up to 100 basis points less.

However, the project must meet several Code guidelines that require a significant percentage of the project rental units to be set aside for low and very low income families. The Code definition of low or very low income is based on a percentage of the area's gross median income. All tenants must demonstrate, and the owners must independently verify, that their income is projected to be within limits at the time of the initial occupancy.

Tax-exempt qualified residential bonds are generally subject to a state volume cap imposed by the Internal Revenue Code based on the population of the state. All non-exempt organizations must participate in a lottery for an allocation of the capped amount for use in housing projects. One of the primary advantages of the use of a tax-exempt 501 (c)(3) organization in housing projects is that they are not subject to the state ceiling. However, the exempt organization is subject to an organizational cap of \$150 million in outstanding exempt bonds. Additionally, the 501 (c)(3) organization must own the entire project that is to be financed with the bonds. This limits the ability of the organization to form joint ventures with other non-exempt businesses, including tax credit financing in tax credit transactions involving bonds, but not for conventionally financed transactions.

### 501(c)(3) Organizations In Residential Projects

Recent guidelines issued by the IRS indicate that it is now feasible for a 501 (c)(3) organization to enter into a limited partnership with taxable and tax-exempt partners to produce affordable housing. This is of increasing importance in the ability of the organization to take advantage of the mandatory 10 percent allocation of Low-Income Housing Tax Credits to 501 (c)(3) organization in conventionally financed transactions. The guidelines maintain that the 501 (c)(3) be the sole general partner and control decision making. The main advantage of this partnership

*Recent guidelines issued by the IRS indicate that it is now feasible for a 501 (c)(3) organization to enter into a limited partnership with taxable and tax-exempt partners to produce affordable housing.*

is the ability of the 501 (c)(3) to leverage other funds available to the organization and produce additional units of housing or housing for very low income families.

### Credit Enhancement

As with other types of bond financings, the interest rates on 501 (c)(3) bonds is largely dictated by the credit rating assigned to the bonds. There are significant financial incentives to minimize interest rates by obtaining to best possible credit rating on the bonds, such as from Standard & Poor's (S&P) or Moody's. Nonprofits may often improve the credit rating on their bonds by obtaining credit enhancement, which insures the principal and interest to the bond holders. Letters of credit,

Ginnie Mae and Fannie Mae mortgage-backed securities and Federal Housing Administration (FHA) mortgage insurance programs are effective tools for this type of enhancement. For FHA insurance, with its Fast-Track processing program, the time required to obtain a decision from the HUD now averages between 60 and 120 days. For FHA-backed multifamily programs, the organization has a choice of loan programs for both initial construction or substantial rehabilitation. However, the developer must secure FHA approval of completed plans and specifications before receipt of all financing commitments. The credit ratings assigned to bonds with these types of credit enhancements typically range from A to AAA.

As an alternative to credit enhancement, S&P offers programs for rating 501 (c)(3) bonds based on an underwriting analysis of the project and the non-profit organization. Under this program, S&P analyzes the loan-to-value ratio, debt coverage ratio and other project related criteria to determine the applicable credit rating. In addition, S&P reviews that nonprofit's track record as a sign of its financial stability and performance.

Issuers in Texas are currently using the pooled 501 (c)(3) bond financing structure. The typical structure involves one or more series of bonds for the acquisition and rehabilitation of multiple properties. Cross collateralization of the properties produces a credit which is generally stronger than its parts. This type of bond structure could be a valuable aid to your organization's ability to produce substantial affordable housing over a short period and a large area. Several of our clients are considering pooled financings at this time.

Use of 501 (c)(3) organizations for the development of affordable housing can achieve 100 percent of the cost for new construction or acquisition and major rehabilitation for a full 40 year term at tax-exempt interest rates.

The ability to obtain credit enhancement and ratings upgrades the market-

## Water Rights Case Heads Texas Supreme Court Docket

By Andrew P. Johnson, III

A case of the little guy vs. the big guy corporation has attracted a lot of attention in the water world. At issue in a case recently argued before the Texas Supreme Court, styled *Bart Sipriano, et al. v. Great Spring Waters of America Inc., a/k/a Ozarka Natural Spring Water Co., et. al.*, is whether a property owner can mine water under his or her land even if it damages the property of a neighbor.

In this case, two rural families contend that Ozarka's irresponsible use of its water well caused damage to the families' water wells. The families are seeking damages from Ozarka.

This issue is among the biggest issues remaining in regards to water law. At stake is the current rule known as the English rule, or rule of capture, which has been firmly established in Texas since 1904.

The rule of capture could also be

described as the "he who has the biggest straw wins" rule. According to this rule, a property owner has absolute control over any and all water he or she can pump onto his or her land, even if the water originates beneath a neighbor's property and damages the neighbor's well.

Ozarka argues that the supreme court should choose to leave the issue up to the state legislature, since the ensuing litigation storm would be a retirement plan for plaintiff's attorneys. The plaintiffs argue that landowners should be required to use water reasonably and not to harm their neighbors.

Most states have abandoned the English rule in favor of regulation. In fact, Texas regulates its surface water with a permitting system similar to the systems other states use to regulate groundwater.

However, if Texas decides to

change its rules now, dramatic consequences will result for large users such as cities, water districts and industry.

If the supreme court and the state legislature do not choose to intervene, landowners can avail themselves of the protection of locally formed groundwater conservation districts such as the Harris-Galveston Coastal Subsidence District or the Edwards Aquifer Authority.

In areas where these districts are not in place and protection is needed, the Texas Water Code governs their creation, which can be accomplished through the Texas Natural Resource Conservation Commission. In certain circumstances, the State Legislature can be used to create districts.

Contact Andrew P. Johnson or Alan P. Petrov for more information on this subject. ■

### 501 (c)(3) Organizations CONT'D FROM PAGE 4

ability of the bonds and the feasibility and success of their projects. The potential success of the use of 501 (c)(3) organizations for housing projects is further supported by the wide availability of exempt bond financing

structures and federal and state or government supported financing programs.

Many non-profits and housing issuers are working with developers and consultants to produce affordable

housing. In the next issue, we will explore some of the guidelines in these relationships, as well as some of the choices, advantages and disadvantages of issuers and non-profits getting into the real estate development business. ■

### Open Meetings Act CONT'D FROM PAGE 1

ingly violate the Act.

At least five separate briefs were filed with the court by the Texas Association of School Boards, The Texas Association of Counties, The Texas Municipal League and the Texas City Attorney's Association. All of these briefs argued essentially the same point: A governmental official should not be punished if he or she is acting in good faith and does not intentionally violate the Act. Such arguments, however, proved to be unpersuasive with the court.

"Appellant is complaining that he

was ignorant of the law. Of course, as the ancient maxim goes, ignorance of the law is no excuse," wrote Judge Tome Price in a concurring opinion.

In addition, Judge Overstreet wrote in the court's majority opinion, "A member of a governmental body can be held criminally responsible for his involvement in the holding of a closed meeting which is not permitted under the Act regardless of his mental state with respect to whether the closed meeting is permitted under the Act."

The message of the *Tovar* decision is to serve as a warning to all elected

officials. Closed sessions must be held in strict conformity within requirements of the Act.

Furthermore, even in those closed sessions that are properly called and noticed, governmental officials must avoid straying from the noticed topics. Even unintentional violations can have dire consequences. ■

## Planning and Testing Checklist for Y2K

By Gale Morgan

You can't stop it, but you can prepare for it. There are many articles, checklists and advisory panels to assist you in making your workplace Y2K compliant. This column summarizes information JR&P has collected on the subject.

First and foremost, verify that your vendors are Y2K compliant.

Vendors may include: the building or location of the office, the telephone system and company, long distance service, engineers, operators, bookkeepers, attorneys, and financial advisors.

If you have not received compliance letters from your vendors, contact them immediately and request that they send you a compliance letter. Request that they detail computer compliance, telephone service, elevator service, and any other service that is crucial to the operation of your business.

Part of our experience in upgrading our computer system last year was that it took our vendor three months to be in a position to deliver a certification that all components of the new system were Y2K compliant.

Here is a plan you can use in your own compliance planning and testing.

- Assemble a Y2K team.

Be sure management, key business units and departments are represented. You must have top-level management support. For legal reasons, make sure that all meetings, tasks, and decisions are documented.

- Have a Y2K compliance kickoff meeting.

Develop your company's own definition or statement of Y2K compliance based on your business and how it uses its systems.

Identify goals, determine a schedule, and plan to meet regularly to review Y2K progress.

- Inventory all systems and applications.

Compile a list of all hardware, software, peripherals, systems, applications, and data that could be affected by Y2K dates.

- Assess the risks and prioritize affected systems.

Bear in mind the definition of compliance for each system or application and assess the business value of each system. For instance, will your invoice mail system crash or will it just drop messages in the system on midnight of January 1?

- Determine your compliance budget.

Develop cost and resource estimates for risk assessment, fixing the affected systems, and testing a small system in order to measure the time it takes to get a system compliant.

- Formalize and begin remediation and testing strategy.
- Acquire and identify fixing and testing tools and resources using automated tools whenever possible.
- Carry out testing.

Develop baselines and testing scripts. These are more rigorous testing methods for mission-critical systems. Run a regression test to determine if the team created any new errors in the system. Use development testing to address whether Y2K changes meet coding specs and perform as outlined.

Examine the system using a Y2K compliance testing method which determines whether the changes work after January 1, 2000, and with Y2K leap-year date. Test for future compliance to assess whether the changes work with all dates after January 1, 2000. Using end-to-end testing, determine whether or not the system and its related systems still meet the business process requirements. Retest systems!

- Prepare a disaster recovery plan.

Establish a team to get mission-critical systems and applications back up and running immediately, if they do fail.

- Sign off on acceptance of compliant systems.

Get a sign-off from the responsible Y2K contingency member, department manager, and vendor contact, if applicable.

- Follow up and maintain Y2K compliance.

Before implementing any Y2K fixes, it is important to develop a comprehensive plan and to understand the risks and costs involved before proceeding.

### Issuance of Public Securities

Determining whether you have a Y2K problem and what to do about it is even more important if you are planning to issue bonds or other public securities in the next year. Both the Securities and Exchange Commission (SEC) and the Municipal Securities Rulemaking Board (MSRB) have issued statements regarding Y2K disclosure. The municipal securities market now expects a disclosure of how Y2K affects your business and what you have done to prepare for or deal with any possible impacts on your business, from operating your facilities to getting your bills out.

*Sources: Association of Legal Administrators; TNRCC; Hartford Insurance; PC Magazine; Brady, Chapman, Holland Associates*

*This article is a summary of an article on Y2K compliance prepared by JR&P. If you would like a complete copy or would like to discuss the issues raised in greater detail, please use the FaxBack Form, call or email. ■*

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## Consumer Confidence CONT'D FROM PAGE 1

ing the risks posed by nitrate, arsenic and radon for certain systems and

8) A specific statement regarding the vulnerability of certain persons to drinking water contaminants.

In addition, the report is required to contain other information about the water system, as well as general information about drinking water.

Each water system must produce its first CCR by October 19, 1999, using information collected during the 1998 calendar year. Wholesale water distributors must provide information about their water to their wholesale customers by April 19, 1999, and by April 1 of each year thereafter. The second CCR for each water system must be produced by July 1, 2000, with subsequent reports due by July of each year thereafter.

In addition, within three months of completion of the CCR each year, the water system must certify to the Texas Natural Resource Conservation Commission that its CCR has been produced and distributed.

A copy of the CCR must be mailed to each customer of every water utility that serves more than 10,000 customers. Customers are defined as the listed accounts that are billed for water service.

For systems serving fewer than 10,000 customers but more than 500 customers, the governor may waive the mailing requirement and instead require that the CCR be published in at least one local newspaper. These systems also will have to notify their customers of the availability of the report. To systems serving fewer than 500 customers, an additional waiver may be granted that would allow an alternate means of notification about the availability of the CCR, in lieu of publication. In all cases, every water system must supply copies of its report on request by any person.

In addition, the regulation requires water utilities to make a good faith effort to reach customers who may not receive water bills, such as people living in apartments or condominiums. Such alternate means of notification may include posting the CCR on the Internet, issuing news releases regard-

ing the availability of the CCR, circulating copies of the CCR to libraries and community centers and sending extra copies of the CCR to multifamily building managers for posting at a central location.

The EPA's goal is requiring production and distribution of CCRs is to provide water consumers accurate information regarding the quality of their drinking water.

By providing this information, water utilities have an important opportunity to increase public confidence and to demonstrate responsiveness to their customers.

Unfortunately, some of the mandatory language required in the reports may have the unintended effect of alarming customers, especially when "contaminants" are discussed. Some attorneys have even predicted that the reports will encourage toxic test litigation.

In order to avoid an unintentional backlash, Johnson Radcliffe & Petrov recommends that all of our water system clients not only follow the minimum requirements of the CCR, but go beyond such minimum requirements in order to educate their customers in advance of the report. We strongly recommend use of an advance mailing about the purpose of the report. When the reports are distributed, a utility system operator must be prepared to answer any questions or phone calls that the system may receive based on the reports.

By promptly, accurately and courteously responding to questions generated by distribution of the CCR, utilities may be able to avoid negative effects of the report. ■

## Legislative Update

The Texas State Legislature convened the 76<sup>th</sup> Legislative session on January 12, 1999. Many bills are being discussed and debated which deal with topics such as: Municipal law, Real estate development, Housing, Non-profit corporations, Taxation, Annexation and Water.

Keep your eyes open for the next issue of "Public Law Report" which will deal more comprehensively with these bills.

## Calendar of Events

### March

- 8-10 National Association of Housing and Redevelopment Officials: Legislative Conference, Washington, D.C.
- 11-12 Texas Municipal League, Public Funds and Investment Law, Austin
- 16-19 Texas Rural Water Association, Annual Convention, Dallas
- 24-26 Bond Buyer Texas Municipal Conference, Houston

### April

- 7-10 Association of Local Housing Finance Agencies, Spring Conference, San Antonio
- 12-16 Texas Municipal League, Public Executive Institute, Kerrville
- 23 Texas Municipal League, Legislative Mid-Year Report, Austin

### May

- 2-5 HUD's National Town Meeting for a Sustainable America, Detroit
- 12-14 Texas Municipal Utilities Association, Spring Meeting, Austin
- 19-21 Texas Municipal Human Resources Association, Mid-Year Conference, Galveston
- 20 American Water Works Association (AWWA), Consumer Confidence Report Seminar, Dallas
- 21 American Water Works Association (AWWA), Consumer Confidence Report Seminar, Houston

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