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BOARD MANUAL

City of Saint Louis
Mental Health Board of Trustees

Revised October 2022

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INTRODUCTION

Welcome

On behalf of the Trustees and Staff, we welcome you to the City of Saint Louis Mental Health Board of Trustees, referred to throughout this handbook as “Saint Louis MHB” or “MHB.” Our Board is comprised of individuals with various backgrounds, knowledge, and skills, representing neighborhoods in the City of St. Louis with a mission to improve the quality of life for city residents by investing and participating in a coordinated system of social, behavioral, and physical health services aligned with community priorities.

Utilizing MHB’s two property tax-based funds, the Community Mental Health Fund and the Community Children’s Services Fund and through its strategic initiatives work leveraging additional funding to support system change, MHB Trustees investments millions of dollars each year to support behavioral health services for children, youth, and adults, in addition to prevention services.

It is our hope that your Board service will be fulfilling, live up to your expectations, and be rewarding. We are pleased to provide you with this Board Manual outlining current policies in effect at MHB. We are sure the Manual will be a helpful reference and also encourage you to ask questions about policies and procedures.

Early in your tenure as a Trustee, you will realize that the Board has set exceedingly high standards. These are necessary if we are to sustain our trusted position in the community that we serve. We want to assist you in your role providing leadership, governance, strategy, policymaking, and oversight of MHB’s work.

We hope that your experience as a Trustee is challenging, enjoyable and rewarding. Again, welcome!

Cassandra Kaufman

Executive Director

ABOUT MHB

Established in 1994, the City of Saint Louis Mental Health Board of Trustees, also known as Saint Louis MHB (MHB) is an independent government taxing authority administering two special property taxes in the City of St. Louis: the Community Mental Health Fund and the Community Children's Services Fund.

MHB was established by authority of the Community Mental Health Act - Sections 205.975-205.909 RSMo. The Act permits counties to pass a mil tax to raise funds for mental health and substance abuse services. The City of St. Louis joined 12 other Missouri counties in 1992 when city voters approved Proposition Care-the mental health mil tax.

Subsequent to the establishment of MHB and the mental health mil tax, by authority of the Child Protection and Reformation Act, Section 210.860-210.861 RSMo, as may be amended, a second mil tax was approved by the voters in 2004 to provide funds for behavioral health and related services to children and youth through age 18, that promotes healthy lifestyles and strengthens families.

Authorized in Missouri state statutes and local ballot initiatives to administer public funds for behavioral health and children's services for the benefit of city residents, MHB does not provide direct services but makes funding available for direct services delivered by non-profit organizations or governments. In addition to its grant making responsibilities, MHB initiates and participates in community planning, collaboration, and in the development and distribution of supplementary financial resources. As reflected in the tag line of our logo, MHB's strategic approach is best described as:

- **Partnering**—by leveraging other funding sources and regional relationships, MHB supports multi-sector partnerships to build equitable, just systems of behavioral health and related services
- **Investing**—MHB builds capacity in the City of St. Louis through funding, relationship building, and technical assistance for organizations who serve the behavioral health needs of city residents
- **Empowering**—Community-driven solutions inform MHB's efforts by highlighting gaps, inequitable root causes, and opportunities for innovation

MHB is governed by a Board of Trustees, who are appointed by the Mayor of the City of St. Louis, according to criteria outlined in the Missouri Statutes noted above. The nominating criteria attempt to achieve a balance between service providers, primary and secondary consumers, and other knowledgeable, concerned city residents. The Trustees, as a body, meet ten times a year and are actively involved in all aspects of MHB activities.

A professional staff, working in concert with the Trustees, carries out the mission of MHB which involves the collection, investing, and distribution of the city tax funds approved by voters for mental health, substance abuse, and children's behavioral health services for City residents from birth through adulthood.

In addition to its grant making responsibility, MHB initiates and participates in community planning, collaboration and in the development of additional new financial resources.

Mission

Saint Louis MHB is on a mission to improve the quality of life for city residents by investing and participating in a coordinated system of social, behavioral, and physical health services aligned with community priorities.

Vision

MHB's vision is to be a strategic visionary leader investing in and strengthening an integrated system of social, behavioral, and physical health services to build an equitable, thriving community.

Values

1. **Stewardship and Accountability** – Because MHB resources are made possible through taxes paid by residents and property owners in the City of St. Louis, MHB is committed to ensuring those resources are used wisely. This means that records are accurate, expenditures are planned and made according to a Board-approved budget, systems are efficient, effective, and transparent, and both Trustees and Staff are prepared to fulfill their roles and possess diverse perspectives so that funding decisions are given consideration from multiple lenses with the goal of creating an equitable community.
2. **Person-Centered** – MHB believes that it is our job to ensure that the programs in which we invest, achieve the best results possible for the people being served. Therefore, it is important MHB-funded projects focus on accessibility, responsiveness, and effectiveness at making change in the well-being of the people they serve. In short, participant benefit—not simply program activities—should be the center of their work.
3. **Collaborative Leadership** – MHB operates from the assumption that no single entity or person has the resources or is capable of achieving community/population-level goals. Therefore, we believe better results will be achieved when we work with other organizations or individuals to address our common goals.
4. **Excellence** – MHB holds itself to the highest standards in all that we do; from our published materials, our relationships with peers, funded organizations, and each other; and our internal systems and operations.
5. **Effectiveness through Learning** – MHB believes that we must be engaged in a continuous learning process in order to remain informed and up to date on new knowledge, trends, and environmental changes that affect our work.
6. **Measurable Impact** – All the work that is done by, and through MHB must ultimately achieve “real” impact. This impact must be quantifiable using data collected and analyzed so that progress with respect to social/behavioral problems addressed can be tracked, and that when we claim success, it must be because the data supports it.

LEGAL ISSUES

MHB's Source of Existence

Memorandum

To: Ms. Jama Dodson, Executive Director, City of St. Louis Mental Health Board

From: William Kuehling, Partner, Thompson Coburn, LLP

Date: August 3, 2017

Re: City of St. Louis Mental Health Board ("MHB") – Source of Existence

This memo is in response to the question from Ms. Anna Marie Wingron of the City of St. Louis Mayor's Office regarding the source of MHB's existence.

Ms. Wingron is correct that the source of MHB's existence is Sections 205.975 – 205.990 RSMo. There are no ordinances which govern the MHB since they would be beyond the authority of the City to impose on this state authorized entity.

These state statutory provisions establish the composition of the Board and how Board members are appointed (Sec. 205.984 RSMo.), the powers and duties of the Board, including what funds can be spent on (Sec. 205.986 RSMo.), authorize a property tax to be levied with voter approval (Sec. 205.977 RSMo.), establish how the election is to be conducted (Sec. 205.979 RSMo.), and how the tax is to be levied (Sec. 205.977).

Acting pursuant to the tax election provisions, voters in the City of St. Louis approved a \$.09 levy in November, 1992, and the Board subsequently received its first funds from the Collector Revenue in late 1993.

Because of this statutory structure, the MHB is a creature of the State of Missouri. The role of the City of St. Louis in the statutory scheme is limited to two areas. First, it appoints the members of the Board (following the statutorily proscribed composition), and second, the ministerial act of the Collector of Revenue collecting and disbursing the tax.

Regarding the appointment of trustees, the Statue provides that the Board is appointed by the "governing body", which is defined in Section 205.975 RSMo. As "county commission, county legislature, or other chief legislative body of a county or city not within a county". The meaning of this is that technically, it is the Board of Aldermen which is the appointive body for Trustees. However, in keeping with the more orderly separation of power between administrative and legislative functions within the City of St. Louis, the practice has generally been that the Mayor's Office submits nominations to the Board of Aldermen. (There was at least one exception in the mid-1990's when the inability to get appointments from the Mayor's Office led to the Board of Aldermen unilaterally appointing at least one Trustee).

Ms. Wingron also inquired about the distinction between the Mental Health Fund Board and the Community Mental Health Fund. The Community Mental Health Fund refers to the proceeds of the mental health tax levy which is controlled and administered by the Mental Health Board of Trustees (Section 205.908 2.RSMO). Thus the "fund" is not an entity. The entity is the City of St. Louis Mental Health Board.

6602402.1

Missouri State Statutes and Regulations Governing the Work of MHB

Community Mental Health Fund Statute

TITLE XII PUBLIC HEALTH AND WELFARE

Chapter 205

Community Mental Health Fund Sections 205.975 – 205.989

205.975. Definitions. — As used in sections [205.975 to 205.990](#), the following words and terms mean:

(1) **"Board of trustees"**, board appointed by a governing body or jointly by governing bodies within a service area for the purposes of administering a county community mental health fund to establish and operate a community mental health center, mental health clinics, or any comprehensive mental health services; to supplement existing funds for a center, clinics, or services, or to purchase services from a center, clinics, or public facilities and not-for-profit corporations providing any comprehensive mental health services;

(2) **"Community mental health center"**, a legal entity through which comprehensive mental health services are provided to individuals residing in a certain service area;

(3) **"Comprehensive mental health services"**, inpatient services, outpatient services, day care and other partial hospitalization services, emergency services, diagnostic and treatment services, liaison and follow-up services, consultation and education services, rehabilitation services, prevention services, screening services, follow-up care services, transitional living services, alcoholism and alcohol abuse prevention and treatment services, and drug addiction and drug abuse prevention and treatment services;

(4) **"Department"**, department of mental health;

(5) **"Governing body"**, county commission, county legislature, or other chief legislative body of a county or city not within a county;

(6) **"Mental health clinic"**, a health entity offering community services delivered from a fixed place or from various places within a service area on an outpatient and consultative basis for the prevention, diagnosis, and treatment of emotional or mental disorders, alcoholism, or drug abuse;

(7) **"Participating counties"**, counties which choose to appropriate funds from their general tax revenues or levy and collect special taxes to support, with other counties, a community mental health center, mental health clinics, or any comprehensive mental health services;

(8) **"Service area"**, a defined geographic area as set forth in the state plan for comprehensive mental health services prepared by the department.

205.976. Department to establish service areas. — The department shall establish service areas within which comprehensive mental health services and programs shall be conducted as defined and

designated in the most recent state plan of the department. A service area may contain several counties situated entirely within its boundaries or one or more service areas may be contained entirely within the boundaries of a county.

205.977. Tax authorized. — Any county which has one or more service areas within its boundaries or which is within the boundaries of a service area may, by a majority vote of the qualified voters voting thereon, levy and collect a tax to accomplish any of the following purposes:

(1) Providing necessary funds to establish, operate, and maintain community mental health centers, mental health clinics, or any comprehensive mental health services;

(2) Providing funds to supplement existing funds for the operation and maintenance of community mental health centers, mental health clinics, or any comprehensive mental health services;

(3) Purchasing any of the comprehensive mental health services from community mental health centers, mental health clinics, and other public facilities or not-for-profit corporations which are designated by the department.

205.979. Election — notice — ballot form — how conducted. — 1. The board of trustees may request that the governing body of the county or counties request the election officials of any county or city not within a county containing all or part of such service area to submit to the qualified voters of such county, or city not within a county, at a* general, primary, or special election the proposition contained in subsection 3 of this section. Such election officials shall give legal notice at least sixty days prior to such general, primary, or special election in at least two newspapers that such proposition shall be submitted at any general, primary, or special election held for submission of the proposal. A request by the board of trustees for a proposition to be submitted to the voters as set out in this section shall be considered a request of the county, or city not within a county, for purposes of section [115.063](#).

2. The tax may not be levied to exceed forty cents per each one hundred dollars assessed valuation therefor.

3. The ballot to be used for voting on the proposition shall be substantially in the following form:

OFFICIAL BALLOT

(Check the one for which you wish to vote.)

Shall (name of county) establish a community mental health fund to establish, improve (and) (or) maintain a community mental health service, and for which the (county) shall levy a tax of (insert exact amount to be voted upon) cents per each one hundred dollars assessed valuation therefor?

☐ YES

☐ NO

4. The election shall be conducted and the vote canvassed in the same manner as other county elections.

205.980. Tax to be levied and collected, when — rate — deposit of funds collected. — 1. The governing body of the county shall, upon approval of a majority of the qualified voters of such county voting thereon, levy and collect a tax as specified on the ballot, not to exceed forty cents per one hundred dollars of assessed valuation upon all taxable property within the county, to accomplish the purposes as set out in section [205.977](#).

2. The tax so levied shall be collected along with other county taxes in the manner provided by law. All funds collected for this purpose shall be deposited in a special fund to be designated "Community Mental Health Fund" to accomplish the purposes as set out in section [205.977](#) and shall be used for no other purpose. Deposits in the fund shall be expended only upon approval of the board of trustees.

3. Tax levies once approved by a majority of the voters shall continue in effect if the question is resubmitted either to raise or lower the levy and not approved by a majority of votes cast on the question.

205.981. May contract for services — length of contract. — 1. The board of trustees may contract with a community mental health center, mental health clinic, or other public facility or not-for-profit corporation as designated by the department for such comprehensive mental health services for the residents of such county as may be mutually agreeable between the board of trustees or officials of such center, clinic, facility, or corporation and the board of trustees of the county requesting the services for the residents thereof.

2. The consideration for the provision of services under this section shall be appropriated out of the county's community mental health fund or may be appropriated out of the county's general revenue fund and shall not exceed an amount of revenue that could be derived from a tax levy authorized by sections [205.977 to 205.980](#).

3. Each contract may be for a term of not exceeding five years, but may be renewed from time to time.

205.982. Joint cooperation authorized — submission of budget requests — withdrawal from cooperative effort. — 1. Governing bodies of counties within a service area may enter into contractual agreements with each other to accomplish any of the following purposes:

(1) The joint provision of necessary funds to establish, operate, and maintain a community mental health center, mental health clinic, or any comprehensive mental health services;

(2) The joint provision of funds to supplement existing funds for the establishment, operation, or maintenance of a community mental health center, mental health clinic, or any comprehensive mental health services;

(3) The joint provision for purchasing any comprehensive mental health services from a community mental health center, mental health clinic, or other public facilities or not-for-profit corporations as designated by the department;

(4) The provision for operation of services and facilities by one participating county under contract with other participating counties.

2. If two or more counties enter into a joint agreement in accordance with subsection 1 of this section, it shall be the obligation of the board of trustees or other governing board of each community mental health center, mental health clinic, public facility, or not-for-profit corporation receiving funds pursuant to the agreement to submit to the governing bodies of the counties, prior to the budget submission date of each governing body, an estimate of the proportionate share of costs of mental health services to be borne by each governing body under the agreement.

3. Any county desiring to withdraw from a joint program may submit to the board of trustees and to any entity receiving funds pursuant to the joint agreement a resolution requesting withdrawal therefrom together with a plan for the equitable adjustment and division of the assets, property, debts, and obligations, if any, of the program. Unless all participating counties by votes of their governing bodies agree to an earlier withdrawal, no county participating in a joint program may withdraw therefrom without the consent of any entity receiving funds pursuant to the joint agreement for services earlier than two years after submission of the withdrawal resolution to the entities receiving funds.

205.983. Joint financing, procedure — treasurer to be bonded. — 1. Any participating county may provide for the financing of its share or portion of the costs or expenses of the joint agreements entered into pursuant to section [205.982](#) in a manner and by the same procedures for the financing by a single county to accomplish the same purposes in accordance with sections [205.977 to 205.981](#), if acting alone and on its own behalf.

2. All moneys received from each participating county pursuant to the joint agreements shall be deposited in a special fund designated as a "Community Mental Health Fund" and disbursed with the approval of the board of trustees in accordance with the joint agreements entered into by the participating counties.

3. The treasurer of the board of trustees, before funds are received from any participating county, shall enter into a bond to each participating county with two or more sureties, to be approved by the board of trustees, conditioned that he will render a faithful and just account of all money that may be deposited into the community mental health fund, and otherwise perform his duties according to law, such bond to be filed with each participating county.

205.984. Board of trustees established — number — nomination — qualifications — appointment — terms. — 1. There shall be established a board of trustees of not less than nine members appointed by the county or participating counties in a service area. The regional advisory council, as defined in section [632.040](#), or any other interested party may nominate individuals for membership on the board. **The governing body of the county or counties shall appoint the members to such board of trustees within one year of January 1, 1991. No more than one-third of the members shall represent public or private entities involved in the provision of services as provided by sections [205.975 to 205.990](#). At least one-third of the members shall represent consumers of psychiatric services or the families of such consumers. Employees of public or private entities which are recipients of funds pursuant to sections [205.975 to 205.990](#) are prohibited from serving on this board of trustees.**

2. The composition of the board of trustees shall be representative of the residents of the county or participating counties within a service area, taking into consideration their employment, age, sex, and place of residence and other demographic characteristics of the area. **At least one member shall be a licensed physician and at least one-half of the members of such body shall be individuals who are not providers of health care.**

3. For multicounty service areas, each participating county shall have at least one representative on the board of trustees. The remaining members shall be appointed in proportion to the populations of the participating counties within the service area.

4. The **terms of office of the members of the board of trustees shall be three years** except that of the first appointments, the terms of the members shall be staggered as follows:

(1) In multicounty service areas, one member from each county shall be appointed to a three-year term. Counties which have two or more representatives shall appoint one member to a two-year term. Counties having more than two representatives shall appoint one-third of its members to one-year terms, one-third to two-year terms, and one-third to three-year terms.

(2) In service areas entirely within a county, one-third of the members shall be appointed for one year, one-third for two years, and one-third for three years.

205.985. Existing facilities may be utilized. — 1. Sections [205.975 to 205.990](#) shall not affect the validity of community mental health centers and other providers of any comprehensive mental health services as designated by the department and governing boards of such centers and providers established and appointed before a county or combination of counties elects to provide funds to accomplish the purposes as set out in sections [205.975 to 205.990](#). However, this section shall not be construed to preclude reconstitution of the centers or other entities and their governing boards to include all or a portion of the board of trustees.

2. Nothing in sections [205.975 to 205.990](#) shall preclude a board of trustees of a service area within a county or of a combination of counties within a service area from contracting with an existing public facility or not-for-profit organization to provide any comprehensive mental health services for the residents of the county or the area to be served.

205.986. Powers and duties of board of trustees. — The board of trustees appointed by a county or participating counties shall have the following powers and responsibilities to administratively control and manage the community mental health fund to accomplish the purposes as set out in sections [205.977](#) and [205.982](#):

(1) In the case of a community mental health center, mental health clinic, or any comprehensive mental health service established by a county or combination of counties, the center, clinic, or service shall be under the administrative control and management of the board of trustees which shall be the governing board which may employ necessary personnel, fix their compensation, and provide quarters and equipment for the operation with funds from federal, state, county, and city governments available for that purpose and which shall take steps as it deems necessary to secure private and public funds to help support the centers, clinics, or services;

(2) In the case of a county or combination of counties providing funds to supplement existing funds or purchase services from an existing community mental health center, mental health clinic, or other public facility or not-for-profit corporation as designated by the department, the board of trustees shall administer and disburse the community mental health fund for the provision of any comprehensive mental health services;

(3) The board of trustees has the authority to contract with existing public facilities or not-for-profit corporations to provide services for the residents of the county or the service area to be served;

(4) The board of trustees shall submit information as required on the disbursement of moneys from the community mental health fund set up to accomplish the purposes as set out in sections [205.977](#) and [205.982](#) to the department by such date as it specifies in order to facilitate annual preparation of regional and state plans.

205.987. Duties of department as to standards — to be met, when. — 1. In consultation with the state advisory council for comprehensive psychiatric services and existing public or private entities providing any comprehensive community mental health services, the department shall develop and promulgate standards of construction, staffing, operations, and services which any public or private entity providing any comprehensive mental health services shall meet before funds collected pursuant to sections [205.975 to 205.990](#) may be disbursed. The records, operations, and services provided by any entity under sections [205.975 to 205.990](#) shall be subject to annual review or inspection by the department.

2. Any entity which provides or seeks to provide any comprehensive mental health service and desires to apply for federal community mental health grants for the purpose of constructing, operating, maintaining, or staffing a comprehensive mental health service shall meet all standards of construction, staffing, operations, and maintenance as developed and promulgated by the department in consultation with the state advisory council for comprehensive psychiatric services and existing public or private entities providing any comprehensive mental health services. Such entities shall be subject to annual review and inspection by the department.

205.988. Additional duties of department. — In addition to duties and powers elsewhere provided in sections [205.975 to 205.990](#), the department shall do the following:

(1) Develop and establish arrangements and procedures for the effective coordination and integration of department services and community mental health services;

(2) Provide consultative services to counties seeking to establish or support community mental health services, and provide other consultative services to the counties, community mental health centers, mental health clinics, or any comprehensive mental health service as the department may deem feasible and appropriate;

(3) Develop and collect information needed to perform its duties in such a manner that the identity of any individual who receives a service from an entity receiving funds pursuant to sections [205.975 to 205.990](#) shall be confidential in accordance with state and federal law.

205.989. Payment for services — services not to be denied for inability to pay. — 1. No person because of inability to pay shall be denied the services of a community mental health center, mental health clinic, or other public facility or not-for-profit corporation in which a county or participating counties have established services or provided funds pursuant to sections [205.975 to 205.990](#).

2. Based on their abilities to pay, persons receiving any comprehensive mental health services funded either in whole or in part in accordance with sections [205.975 to 205.990](#) shall be charged for the

services. The amounts necessary to be charged for the services shall be related to the actual per capita inpatient costs or actual outpatient or examination or other service costs.

Missouri Department of Mental Health Certification

The State of Missouri does not require certification for non-contracted agencies providing mental health or substance use services unless required for entities providing services eligible for certification and receiving county mental health funds under:

Missouri Department of Mental Health - Certification

9 CSR 30-2.010 Designation of Programs to Receive County Community Mental Health Funds

The Missouri Department of Mental Health is mandated to develop certification standards and to certify an organization's level of service, treatment or rehabilitation as necessary for the organization to operate, receive funds from the department, or participate in a service network authorized by the department and be eligible for reimbursement for the following Medicaid programs: Comprehensive Substance Treatment and Rehabilitation (CSTAR); or Community Psychiatric Rehabilitation (CPR).

The primary function of the certification process is to assess an organization's compliance with standards of care. The review process ensures that providers maintain compliance with applicable state standards and provide quality services that remain consistent with the Department's Mission, Vision, and Values. Surveyors are charged with the task of reviewing multiple sources of information to arrive at a global view of the agency, while making recommendations for change as agencies strive for quality services. A key goal of certification is to enhance the quality of care and services with a focus on the needs and outcomes of persons served.

Application submission instructions and resources may be found by clicking on the hyperlink above, 'Missouri Department of Mental Health Certification'.

Current standards may be downloaded directly from the DMH website:

Missouri Secretary of State – Code of State Regulations, Title 9 – Department of Mental Health

Division 10 - Director, Department of Mental Health

Relevant Chapters to review include:

Division 10 – Chapter 5: General Program Procedures

Division 10 – Chapter 7: Core Rules for Psychiatric and Substance Use Disorder Programs

Division 30 – Chapter 3: Substance Use Disorder Prevention and Treatment Programs

Division 30 – Chapter 4: Mental Health Programs

Division 30 – Chapter 6: Certified Community Behavioral Health Organization

Hyperlinks to PDFs of the current standards may be found on the DMH Certification website. Agencies can register to receive notification of rule changes on the Missouri Secretary of State's website.

Questions concerning DMH certification should be directed to Miranda Robinett, Manager of Certification and Program Monitoring by email Miranda.Robinette@dmh.mo.gov or phone (573) 526-1572.

Accredited vs. Non-Accredited Agencies

An organization may request certification by completing an application form. The Department of Mental Health, Division of Behavioral Health, grants a certificate upon receipt of a completed application to an organization which has attained accreditation from:

- CARF International
- The Joint Commission
- Council of Accreditation (under standards for behavioral healthcare that are equivalent to Department of Behavioral Health program standards)

Accredited agencies can complete and submit an 'application for accredited agencies' along with their full accreditation report. Agencies which are not accredited by one of the three organizations listed above are directed to complete and submit an 'application for non-accredited agencies' along with required information and documentation outlined in the application.

Application for certification – Accredited Agencies

Application for Certification - Non-Accredited Agencies

TITLE XII PUBLIC HEALTH AND WELFARE

Chapter 210

**Community Children's Services Fund
Sections 210.860 – 210.861**

210.860. Tax levy, amount, purposes — ballot — deposit of funds in special community children's services fund. — 1. The governing body of any county or city not within a county may, after voter approval pursuant to this section, **levy a tax not to exceed twenty-five cents on each one hundred dollars of assessed valuation on taxable property in the county for the purpose of providing counseling, family support, and temporary residential services to persons eighteen years of age or less and those services described in section 210.861.** The question shall be submitted to the qualified voters of the county or city not within a county at a county or state general, primary or special election upon the motion of the governing body of the county or city not within a county or upon the petition of eight percent of the qualified voters of the county determined on the basis of the number of votes cast for governor in such county or city not within a county at the last gubernatorial election held prior to the filing of the petition. The election officials of the county or city not within a county shall give legal notice as provided in [chapter 115](#). The question shall be submitted in substantially the following form:

Shall _____ County (City) be authorized to levy a tax of _____ cents on each one hundred dollars of assessed valuation on taxable property in the county (city) for the purpose of establishing a community children's services fund for purposes of providing funds for counseling and related services to children and youth in the county (city) eighteen years of age or less and services which will promote healthy lifestyles among children and youth and strengthen families?

☐ YES

☐ NO

If a majority of the votes cast on the question by the qualified voters voting thereon are in favor of the question, then the tax shall be levied and collected as otherwise provided by law. If a majority of the votes cast on the question by the qualified voters voting thereon are opposed to the question, then the tax shall not be levied unless and until the question is again submitted to the qualified voters of the county or city not within a county and a majority of such voters are in favor of such a tax, and not otherwise.

2. All revenues generated by the tax prescribed in this section shall be deposited in the county treasury or, in a city not within a county, to the board established by law to administer such fund to the credit of a special "Community Children's Services Fund" to accomplish the purposes set out herein and shall be used for no other purpose. Such fund shall be administered by and expended only upon approval by a board of directors, established pursuant to section [210.861](#).

210.861. Board of directors, term, expenses, organization — powers — funds, expenditure, purpose, restrictions. — 1. **When the tax prescribed by section 210.860 or section 67.1775 is established, the governing body of the city or county or city not within a county shall appoint a board of directors consisting of nine members, who shall be residents of the city or county or city not within a**

county. All board members shall be appointed to serve for a term of three years, except that of the first board appointed, three members shall be appointed for one-year terms, three members for two-year terms and three members for three-year terms. Board members may be reappointed. In a city not within a county, or any county of the first classification with a charter form of government with a population not less than nine hundred thousand inhabitants, or any county of the first classification with a charter form of government with a population not less than two hundred thousand inhabitants and not more than six hundred thousand inhabitants, or any noncharter county of the first classification with a population not less than one hundred seventy thousand and not more than two hundred thousand inhabitants, or any noncharter county of the first classification with a population not less than eighty thousand and not more than eighty-three thousand inhabitants, or any third classification county with a population not less than twenty-eight thousand and not more than thirty thousand inhabitants, or any county of the third classification with a population not less than nineteen thousand five hundred and not more than twenty thousand inhabitants the members of the community mental health board of trustees appointed pursuant to the provisions of sections 205.975 to 205.990 shall be the board members for the community children's services fund. The directors shall not receive compensation for their services, but may be reimbursed for their actual and necessary expenses.

2. The board shall elect a chairman, vice chairman, treasurer, and such other officers as it deems necessary for its membership. Before taking office, the treasurer shall furnish a surety bond or comparable insurance coverage for theft, misappropriation, mismanagement, or other acts, in an amount to be determined and in a form to be approved by the board, for the faithful performance of his or her duties and faithful accounting of all moneys that may come into his or her hands. The treasurer shall enter into the surety bond or comparable insurance coverage with a surety company or insurer authorized to do business in Missouri, and the cost of such bond or comparable insurance coverage shall be paid by the board of directors. The board shall administer and expend all funds generated pursuant to section 210.860 or section 67.1775 in a manner consistent with this section. The board shall not be mandated to expend funds by an act of state legislation without a majority vote of the county or city not within a county, excluding any county with a charter form of government and with more than nine hundred fifty thousand inhabitants.

3. The board may contract with public or not-for-profit agencies licensed or certified where appropriate to provide qualified services and may place conditions on the use of such funds. The board shall reserve the right to audit the expenditure of any and all funds. The board and any agency with which the board contracts may establish eligibility standards for the use of such funds and the receipt of services. No member of the board shall serve on the governing body, have any financial interest in, or be employed by any agency which is a recipient of funds generated pursuant to section 210.860 or section 67.1775.

4. Revenues collected and deposited in the community children's services fund may be expended for the purchase of the following services:

(1) Up to thirty days of temporary shelter for abused, neglected, runaway, homeless or emotionally disturbed youth; respite care services; and services to unwed mothers;

(2) Outpatient chemical dependency and psychiatric treatment programs; counseling and related services as a part of transitional living programs; home-based and community-based family intervention programs; unmarried parent services; crisis intervention services, inclusive of

telephone hotlines; and prevention programs which promote healthy lifestyles among children and youth and strengthen families;

(3) Individual, group, or family professional counseling and therapy services; psychological evaluations; and mental health screenings.

5. Any county, excluding any county with a charter form of government and with more than nine hundred fifty thousand inhabitants, or city not within a county in which voters have approved the levy of a tax under section 67.1775 or section 210.860 shall not add services in addition to those which are set forth in subsection 4 of this section at the time such levy is approved by the voters, unless such services authorized by statute after the voters have approved the levy are approved by the voters in the same manner as the original levy was approved. A proposal to add services shall be approved as set forth in section 67.1775 or section 210.860.

6. Revenues collected and deposited in the community children's services fund may not be expended for inpatient medical, psychiatric, and chemical dependency services, or for transportation services.

Interpretation of Authority—March 1994 Legal Opinion

Legal Opinion provided by William Kuehling, The Smith Partnership, P.C.—March 22, 1994

**Don Cuvo, Executive Director
City of St. Louis Mental Health Board of Trustees**

Members of the City of St. Louis Mental Health Board of Trustees

An opinion was requested on the limitations established by the Community Mental Health Act – Sections 205.975 – 205.990 RSMo. (1993) (hereinafter “Act”) on the funding activities of the City of St. Louis Mental Health Board of Trustees (hereinafter “Board”). This is important because the Board would be subject to taxpayer suite were it to use its tax funds in a manner not authorized by law. Also, it was requested that the role of the Department of Mental Health (hereinafter “DMH”) vis a vis of the Board be examined.

As will become obvious from this response the applicable provisions of state law are not an example of clarity in draftsmanship. There are several ambiguities which can be interpreted differently by different people. However, this opinion will provide some basic guidelines. Of course, these general guidelines can't anticipate every situation which may present itself and in certain situations case by case determinations may be necessary. Further I should point out that this interpretation represents only an opinion, and if a question arises only a court of law can settle the question with finality.

Summary

The Board may fund community mental health centers (hereinafter “centers”) or mental health clinics (hereinafter “clinics”) which are designated and certified by DMH. It may also establish and operate its own centers or clinics without prior DMH approval, although these would have to meet certification standards.

A center is defined by the Act as:

“a legal entity through which comprehensive mental health services are provided to individuals residing in a certain service area.” Sec. 205.975(2) RSMo.

A clinic is defined by the Act as:

“a health entity offering community services delivered from a fixed place or from various places within a service area on an outpatient and consultative basis for the prevention, diagnosis, and treatment of emotional or mental disorders, alcoholism, or drug abuse”.
(Sec. 205.975(6) RSMo.)

The Board has latitude in providing funding for “community mental health services (hereinafter “services”). The act defines services as:

“inpatient services, outpatient services, day care and other partial hospitalization services, emergency services, diagnostic and treatment services, liaison and follow-up services, consultation and education services, rehabilitation services, prevention

services, screening services, follow-up care services, transitional living services, alcohol abuse prevention and treatment services, and drug addiction and drug abuse prevention and treatment services.” (Sec. 205.975(3) RSMo.)

In funding services, a case by case determination will have to be made to assure that the service is of the type authorized by the Act. If the service is authorized, the Board will then have to determine whether the service is one for which certification standards exists. If such DMH certification exists, then the Board must only fund certified entities. If the service being funded is one for which no certification by DMH exists, then the Board may contract for these services through any entity of its choosing. These services may be provided by centers or clinics, or by other entities, both public and private, designated or not designated. There is no positive obligation on the part of the Board to fund only designated entities in contracting for services.

In funding services, caution will have to be exercised as to the terms of the grant contract so that it is clear the Board is funding a service it is authorized by the Act to fund, and whether or not the service is a certified or non-certified.

Rationale

A person attempting to interpret a law (or a portion of a law) must strive to give force to the intention of the general assembly as expressed in the words of the statute. In doing so one must look at the statute in its entirety, and not assume that the legislature would commit an illogical act or enact language with no meaning.

The Missouri Community Mental Health Act displays the tension between the desire for a centralized mental health system run by DMH, and a decentralized county based community mental health system. Straddling these dual goals, the act often fails to give clear direction.

What is the authority of DMH under the Act?

Sec. 205.987.1. grants DMH broad authority to promulgate and enforce standards as to the provision of comprehensive community mental health services. It reads as follows, (underlining for emphasis):

205.987.1. In consultation with the state advisory council for comprehensive psychiatric services and existing public or private entities providing any comprehensive community mental health services, the department shall develop and promulgate standards of construction, staffing, operations, and services which any public or private entity providing any comprehensive mental health services shall meet before funds collected pursuant to sections 205.975 to 205.990 may be disbursed. The records, operations, and services provided by any entity under sections 205.975 to 205.990 shall be subject to annual review or inspection by the department.

Further, Section 205.988 (1) authorizes DMH and empowers to establish procedures to coordinate DMH and community mental health services. It reads as follows:

205.988 In addition to duties and powers elsewhere provided in sections 205.975 to 205.990, the department shall do the following:

- (1) Develop and establish arrangements and procedures for the effective coordination and integration of department services and community mental health services;

Based on the above provisions DMH has promulgated certain regulations found in Title 9 Division 30 of the Code of State Regulations. Among these is 9 CFR 30-2.010 which specifically deals with standards for county funded mental health services (Attachment I).

(An interesting question is whether this broad delegation of authority by the general assembly to DMH without any standards or guidelines is an illegal delegation or legislative authority. However, this is beyond the scope of this opinion.)

The intention of these regulations is clearly not to have public funds expensed on substandard mental health providers but they fall far short from mandating a DMH run delivery system.

To this end the regulations provide that DMH will designate centers “which may receive funds” from a board, and it shall so designate as eligible any public or nonprofit centers that are certified by the department under program certification standards. Also, the regulations do not allow a certified center to serve as a conduit to a noncertified center for the provision of services.

It is significant that not appearing in the regulations is any prohibition on a Board funding through other entities services for which no certification exists. The regulations in 9 CSR 30-2.010(6) that there are such services for which no certification exists, and they make it clear that designated centers or clinics are not prohibited from providing such services even though such certification does not exist.

Other sections of the law lend support to the concept that local boards have latitude in providing noncertified services through entities not designated by DMH.

The first section which lends support to this position is section 205.977 wherein the general assembly stated the three purposes for which community mental health tax could be levied.

The section reads as follows:

205.977 Any county which has one or more service areas...may, by a majority vote of the qualified voters voting thereon, levy and collect a tax to accomplish any of the following purposes:

- (1) Providing necessary funds to establish, operate, and maintain community mental health centers, mental health clinics, or any comprehensive mental health services;
- (2) Providing funds to supplement existing funds for the operation and maintenance of community mental health centers, mental health clinics, or any comprehensive mental health services;

- (3) Purchasing any of the comprehensive mental health services from community mental health centers, mental health clinics, and other public facilities or not for profit corporations which are designated by the department.

The inclusion of services in the first two subsections clearly indicated the general assembly envisioned the board be authorized to do more than fund centers or clinics. The general assembly could easily have limited the role of the board to funding only centers and clinics but chose not to. Nor is any role for DMH mentioned in the first two subsections for which the tax may be levied.

In the third subsection the limiting language “which are designated by the department” appears after the words “not for profit corporations” and raises more questions than it answers. Does this language modify all the entities enumerated before it so as to require prior DMH designation or only not for profit corporations? Normal usage would recommend that it only modifies not for profit corporations which were being used by DMH to provide services in certain service areas could clearly qualify for the receipt of Board funds? And how does the “purchasing” of services mentioned in the second subsection for which not limiting “which are designated” language appears?

An examination of other sections of the act fail to clarify the situation.

Sec. 205.986 RSMo. Established the powers and duties for the Board and reads as follows (underlining for emphasis):

Sec. 205.986 “The Board of trustees appointed by a county...shall have the following powers and responsibilities to administratively control and manage the community mental health fund to accomplish the purposes as set out in sections 205.977 and 205.982:

- (1) In the case of a community mental health center, mental health clinic, or any comprehensive mental health services established by a county...the center, clinic, or services shall be under the administrative control and management of the board of trustees which shall be the governing board which may employ necessary personnel, fix their compensation, and provide quarters and equipment for the operation with funds from federal, state, county, and city governments available for the purpose and which shall take steps as it deems necessary to secure private and public funds to help support the centers, clinics, or services;
- (2) in the case of a county or combination of counties providing funds to supplement existing funds or purchase services from an existing community mental health center, mental health clinic, or other public facility or not for profit corporation as designated by the department, the board of trustees shall administer and disburse the community mental health fund for the provision of any comprehensive mental health services;
- (3) The board of trustees has the authority to contract with existing facilities or not for profit corporations to provide services for the residents of the county or the service area to be served;
- (4) the board of trustees shall submit information as required on the disbursement of moneys from the community mental health funds set up to accomplish the purposes as set out in

sections 205.977 and 205.982 to the department by such date as it specifies in order to facilitate annual preparation of regional and state plans."

Subsection (1) mirrors the purpose outlined in Sec.205.977(1), and basically would allow the Board to directly establish or provide clinics, centers, or services. No mention of prior DMH approval is made.

Subsection (2), while similar to subsection (2) of Sec. 205.977 (establishing the purposes of the tax) now adds the more restrictive "as designated by the department" language which did not appear in the other subsection. Again, does this restrictive language apply to all prior enumerated entities, or just the not for profits? And which section takes precedence, that enumerating the purposes for which a tax could be levied, or this section?

Then subsection (3) appears and establishes a broad grant of authority to the Board to contract with existing public entities and not for profits, with no mention whatsoever of prior MDH designation. How is this authority to be reconciled with the more restrictive sections of the act?

Subsection 4 in combination with the regulations adopted by the DMH interpreting their authority actually helps achieve a workable system out of these various conflicting provisions of law.

Subsection (4) requires the Board to report to DMH on its funding activities by January 1 so that the DMH can prepare its annual plans. This subsection is significant because it is clear the general assembly placed the DMH in the reactive position. The legislature obviously contemplated that the local boards would make their decisions on what to fund and in what amounts, and that DMH would adjust its annual plans accordingly. The general assembly didn't envision DMH preparing a rigid master plan for a service area and then providing it to the local board so that they could plan accordingly. This interpretation is consistent with notion that the board, on its own and without DMH designation, could directly establish its own clinic, center, or directly provide services.

Conclusion

The current Act contains various ambiguous provisions which should be clarified by the general assembly if the opportunity presents itself in the future. However, the existing ambiguity however shouldn't deter the board from implementing a reasoned plan for the use of its tax funds within the guidelines discussed in this letter.

It is quite likely that this opinion may raise further questions, which I would be happy to address. Please call me if you have any.

Sincerely,

William J. Kuehling

William J. Kuehling

Conflicts of Interest

Financial Interest Statements

TITLE VIII PUBLIC OFFICERS AND EMPLOYEES, BONDS AND RECORDS

Chapter 105 Sections 105.483 – 105.489

105.483. Financial interest statements — who shall file, exception. — Each of the following persons shall be required to file a financial interest statement:

- (1) Associate circuit judges, circuit court judges, judges of the courts of appeals and of the supreme court, and candidates for any such office;
- (2) Persons holding an elective office of the state, whether by election or appointment, and candidates for such elective office, except those running for or serving as county committee members for a political party pursuant to section [115.609](#) or section [115.611](#);
- (3) The principal administrative or deputy officers or assistants serving the governor, lieutenant governor, secretary of state, state treasurer, state auditor and attorney general, which officers shall be designated by the respective elected state official;
- (4) The members of each board or commission and the chief executive officer of each public entity created pursuant to the constitution or interstate compact or agreement and the members of each board of regents or curators and the chancellor or president of each state institution of higher education;
- (5) The director and each assistant deputy director and the general counsel and the chief purchasing officer of each department, division and agency of state government;
- (6) Any official or employee of the state authorized by law to promulgate rules and regulations or authorized by law to vote on the adoption of rules and regulations;
- (7) Any member of a board or commission created by interstate compact or agreement, including the executive director and any Missouri resident who is a member of the bi-state development agency created pursuant to sections [70.370 to 70.440](#);
- (8) Any board member of a metropolitan sewer district authorized under [Section 30\(a\) of Article VI](#) of the State Constitution;
- (9) Any member of a commission appointed or operating pursuant to sections [64.650 to 64.950](#), sections [67.650 to 67.658](#), or sections [70.840 to 70.859](#);
- (10) The members, the chief executive officer and the chief purchasing officer of each board or commission which enters into or approves contracts for the expenditure of state funds;

(11) Each elected official, candidate for elective office, the chief administrative officer, the chief purchasing officer and the general counsel, if employed full time, of each political subdivision with an annual operating budget in excess of one million dollars, and each official or employee of a political subdivision who is authorized by the governing body of the political subdivision to promulgate rules and regulations with the force of law or to vote on the adoption of rules and regulations with the force of law; unless the political subdivision adopts an ordinance, order or resolution pursuant to subsection 4 of section [105.485](#);

(12) Any person who is designated as a decision-making public servant by any of the officials or entities listed in subdivision (6) of section [105.450](#);

(13) Any person selected by the state auditor as an applicant to be considered by the majority leader and minority leader of the senate for the post of nonpartisan state demographer pursuant to [Article III, Section 3](#) of the Missouri Constitution.

105.485. Financial interest statements — form — contents — political subdivisions, compliance — redaction of certain information, when. — 1. Each financial interest statement required by sections [105.483 to 105.492](#) shall be on a form prescribed by the commission and shall be signed and verified by a written declaration that it is made under penalties of perjury; provided, however, the form shall not seek information which is not specifically required by sections [105.483 to 105.492](#).

2. Each person required to file a financial interest statement pursuant to subdivisions (1) to (12) of section [105.483](#) shall file the following information for himself or herself, his or her spouse and dependent children at any time during the period covered by the statement, whether singularly or collectively; provided, however, that said person, if he or she does not know and his or her spouse will not divulge any information required to be reported by this section concerning the financial interest of his or her spouse, shall state on his or her financial interest statement that he or she has disclosed that information known to him or her and that his or her spouse has refused or failed to provide other information upon his or her bona fide request, and such statement shall be deemed to satisfy the requirements of this section for such financial interest of his or her spouse; and provided further if the spouse of any person required to file a financial interest statement is also required by section [105.483](#) to file a financial interest statement, the financial interest statement filed by each need not disclose the financial interest of the other, provided that each financial interest statement shall state that the spouse of the person has filed a separate financial interest statement and the name under which the statement was filed:

(1) The name and address of each of the employers of such person from whom income of one thousand dollars or more was received during the year covered by the statement;

(2) The name and address of each sole proprietorship which he or she owned; the name, address and the general nature of the business conducted of each general partnership and joint venture in which he or she was a partner or participant; the name and address of each partner or coparticipant for each partnership or joint venture unless such names and addresses are filed by the partnership or joint venture with the secretary of state; the name, address and general nature of the business conducted of any closely held corporation or limited partnership in which the person owned ten percent or more of any class of the outstanding stock or limited partners' units; and the name of any publicly traded corporation or limited partnership which is listed on a regulated stock exchange or automated quotation system in which the person owned two percent or more of any class of outstanding stock, limited partnership units or other equity interests;

(3) The name and address of any other source not reported pursuant to subdivisions (1) and (2) and subdivisions (4) to (9) of this subsection from which such person received one thousand dollars or more of income during the year covered by the statement, including, but not limited to, any income otherwise required to be reported on any tax return such person is required by law to file; except that only the name of any publicly traded corporation or limited partnership which is listed on a regulated stock exchange or automated quotation system need be reported pursuant to this subdivision;

(4) The location by county, the subclassification for property tax assessment purposes, the approximate size and a description of the major improvements and use for each parcel of real property in the state, other than the individual's personal residence, having a fair market value of ten thousand dollars or more in which such person held a vested interest including a leasehold for a term of ten years or longer, and, if the property was transferred during the year covered by the statement, the name and address of the persons furnishing or receiving consideration for such transfer;

(5) The name and address of each entity in which such person owned stock, bonds or other equity interest with a value in excess of ten thousand dollars; except that, if the entity is a corporation listed on a regulated stock exchange, only the name of the corporation need be listed; and provided that any member of any board or commission of the state or any political subdivision who does not receive any compensation for his or her services to the state or political subdivision other than reimbursement for his or her actual expenses or a per diem allowance as prescribed by law for each day of such service need not report interests in publicly traded corporations or limited partnerships which are listed on a regulated stock exchange or automated quotation system pursuant to this subdivision; and provided further that the provisions of this subdivision shall not require reporting of any interest in any qualified plan or annuity pursuant to the Employees' Retirement Income Security Act;

(6) The name and address of each corporation for which such person served in the capacity of a director, officer or receiver;

(7) The name and address of each not-for-profit corporation and each association, organization, or union, whether incorporated or not, except not-for-profit corporations formed to provide church services, fraternal organizations or service clubs from which the officer or employee draws no remuneration, in which such person was an officer, director, employee or trustee at any time during the year covered by the statement, and for each such organization, a general description of the nature and purpose of the organization;

(8) The name and address of each source from which such person received a gift or gifts, or honorarium or honoraria in excess of two hundred dollars in value per source during the year covered by the statement other than gifts from persons within the third degree of consanguinity or affinity of the person filing the financial interest statement. For the purposes of this section, a **"gift"** shall not be construed to mean political contributions otherwise required to be reported by law or hospitality such as food, beverages or admissions to social, art, or sporting events or the like, or informational material. For the purposes of this section, a **"gift"** shall include gifts to or by creditors of the individual for the purpose of cancelling, reducing or otherwise forgiving the indebtedness of the individual to that creditor;

(9) The lodging and travel expenses provided by any third person for expenses incurred outside the state of Missouri whether by gift or in relation to the duties of office of such official, except that such statement shall not include travel or lodging expenses:

(a) Paid in the ordinary course of business for businesses described in subdivisions (1), (2), (5) and (6) of this subsection which are related to the duties of office of such official; or

(b) For which the official may be reimbursed as provided by law; or

(c) Paid by persons related by the third degree of consanguinity or affinity to the person filing the statement; or

(d) Expenses which are reported by the campaign committee or candidate committee of the person filing the statement pursuant to the provisions of [chapter 130](#); or

(e) Paid for purely personal purposes which are not related to the person's official duties by a third person who is not a lobbyist, a lobbyist principal or member, or officer or director of a member, of any association or entity which employs a lobbyist. The statement shall include the name and address of such person who paid the expenses, the date such expenses were incurred, the amount incurred, the location of the travel and lodging, and the nature of the services rendered or reason for the expenses;

(10) The assets in any revocable trust of which the individual is the settlor if such assets would otherwise be required to be reported under this section;

(11) The name, position and relationship of any relative within the first degree of consanguinity or affinity to any other person who:

(a) Is employed by the state of Missouri, by a political subdivision of the state or special district, as defined in section [115.013](#), of the state of Missouri;

(b) Is a lobbyist; or

(c) Is a fee agent of the department of revenue;

(12) The name and address of each campaign committee, political committee, candidate committee, or continuing committee for which such person or any corporation listed on such person's financial interest statement received payment; and

(13) For members of the general assembly or any statewide elected public official, their spouses, and their dependent children, whether any state tax credits were claimed on the member's, spouse's, or dependent child's most recent state income tax return.

3. For the purposes of subdivisions (1), (2) and (3) of subsection 2 of this section, an individual shall be deemed to have received a salary from his or her employer or income from any source at the time when he or she shall receive a negotiable instrument whether or not payable at a later date and at the time when under the practice of his or her employer or the terms of an agreement he or she has earned or is entitled to anything of actual value whether or not delivery of the value is deferred or right to it has vested. The term income as used in this section shall have the same meaning as provided in the Internal Revenue Code of 1986, and amendments thereto, as the same may be or becomes effective, at any time or from time to time for the taxable year, provided that income shall not be considered received or earned

for purposes of this section from a partnership or sole proprietorship until such income is converted from business to personal use.

4. Each official, officer or employee or candidate of any political subdivision described in subdivision (11) of section 105.483 shall be required to file a financial interest statement as required by subsection 2 of this section, unless the political subdivision biennially adopts an ordinance, order or resolution at an open meeting by September fifteenth of the preceding year, which establishes and makes public its own method of disclosing potential conflicts of interest and substantial interests and therefore excludes the political subdivision or district and its officers and employees from the requirements of subsection 2 of this section. A certified copy of the ordinance, order or resolution shall be sent to the commission within ten days of its adoption. The commission shall assist any political subdivision in developing forms to complete the requirements of this subsection. The ordinance, order or resolution shall contain, at a minimum, the following requirements with respect to disclosure of substantial interests:

(1) Disclosure in writing of the following described transactions, if any such transactions were engaged in during the calendar year:

(a) For such person, and all persons within the first degree of consanguinity or affinity of such person, the date and the identities of the parties to each transaction with a total value in excess of five hundred dollars, if any, that such person had with the political subdivision, other than compensation received as an employee or payment of any tax, fee or penalty due to the political subdivision, and other than transfers for no consideration to the political subdivision;

(b) The date and the identities of the parties to each transaction known to the person with a total value in excess of five hundred dollars, if any, that any business entity in which such person had a substantial interest, had with the political subdivision, other than payment of any tax, fee or penalty due to the political subdivision or transactions involving payment for providing utility service to the political subdivision, and other than transfers for no consideration to the political subdivision;

(2) The chief administrative officer and chief purchasing officer of such political subdivision shall disclose in writing the information described in subdivisions (1), (2) and (6) of subsection 2 of this section;

(3) Disclosure of such other financial interests applicable to officials, officers and employees of the political subdivision, as may be required by the ordinance or resolution;

(4) Duplicate disclosure reports made pursuant to this subsection shall be filed with the commission and the governing body of the political subdivision. The clerk of such governing body shall maintain such disclosure reports available for public inspection and copying during normal business hours.

5. The name and employer of dependent children under twenty-one years of age of each person required to file a financial interest form under this section shall be redacted and not made publicly available, upon the written request of such person to the commission.

6. Nothing in subsection 5 of this section shall be construed to abate the responsibility of reporting the names and employers of dependent children of each person required to file a financial interest form.

105.487. Financial interest statements — filed, when, exception. — The financial interest statements shall be filed at the following times, but no person is required to file more than one financial interest statement in any calendar year:

(1) Each candidate for elective office, except those candidates for county committee of a political party pursuant to section [115.609](#) or section [115.611](#), who is required to file a personal financial disclosure statement shall file a financial interest statement no later than fourteen days after the close of filing at which the candidate seeks nomination or election, and the statement shall be for the twelve months prior to the closing date, except that in the event an individual does not become a candidate until after the date of certification for candidates, the statement shall be filed within fourteen days of the individual's nomination by caucus. An individual required to file a financial interest statement because of the individual's candidacy for office prior to a primary election in accordance with this section is also required to amend such statement no later than the close of business on Monday prior to the general election to reflect any changes in financial interest during the interim. The appropriate election authority shall provide to the candidate at the time of filing for election written notice of the candidate's obligation to file pursuant to sections [105.483 to 105.492](#) and the candidate shall sign a statement acknowledging receipt of such notice;

(2) Each person appointed to office, except any person elected for county committee of a political party pursuant to section [115.617](#), and each official or employee described in section [105.483](#) who is not otherwise covered in this subsection shall file the statement within thirty days of such appointment or employment;

(3) Every other person required by sections [105.483 to 105.492](#) to file a financial interest statement shall file the statement annually not later than the first day of May and the statement shall cover the calendar year ending the immediately preceding December thirty-first; provided that the governor, lieutenant governor, any member of the general assembly or any member of the governing body of a political subdivision may supplement such person's financial interest statement to report additional interests acquired after December thirty-first of the covered year until the date of filing of the financial interest statement;

(4) The deadline for filing any statement required by sections [105.483 to 105.492](#) shall be 5:00 p.m. of the last day designated for filing the statement. When the last day of filing falls on a Saturday or Sunday or on an official state holiday, the deadline for filing is extended to 5:00 p.m. on the next day which is not a Saturday or Sunday or official holiday. Any statement required within a specified time shall be deemed to be timely filed if it is postmarked no later than midnight of the day previous to the last day designated for filing the statement.

105.489. Financial interest statements — to be kept with filing officer. — The financial interest statements required to be filed pursuant to the provisions of sections [105.483 to 105.492](#), other than pursuant to subsection 4 of section [105.485](#), shall be filed with the appropriate filing officer or officers. For the purpose of sections [105.483 to 105.492](#), the term "**filing officer**" is defined as:

(1) In the case of state elected officials and candidates for such office, and all other state officials and employees, the filing officer is the commission;

(2) In the case of judges of courts of law, the filing officer shall be the clerk of the supreme court. Financial interest statements filed by judges shall be made available for public inspection unless otherwise provided by supreme court rule;

(3) In the case of persons holding elective office in any political subdivision and candidates for such offices, and in the case of all other officers or employees of a political subdivision, the filing officer shall be the commission.

Resolution on Disclosure of Conflicts of Interest

A RESOLUTION OF THE CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES REAFFIRMING THE ADOPTION OF RESOLUTION ESTABLISHING A CODE OF ETHICS AND PROCEDURE TO DISCLOSE POTENTIAL CONFLICTS OF INTERESTS AND SUBSTANTIAL INTERESTS FOR CERTAIN OFFICIALS.

**BE IT RESOLVED BY THE CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES AS
FOLLOWS:**

RESOLVED, that the City of St. Louis Mental Health Board of Trustees, with respect to their administration and responsibilities for the Community Mental Health Fund and Community Children's Services Fund, hereby reaffirm the adoption of its Resolution Establishing a Code of Ethics and Procedure to Disclose Potential Conflicts of Interest and Substantial Interests of Certain Officials as follows:

CODE OF ETHICS OF THE CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES

Section 1. Declaration of Policy. The proper operation of government requires that public officials and employees be independent, impartial and responsible to the people; that government decisions and policy be made in the proper channels of the government structure; that public office not be used for personal gain; and that the public have confidence in the integrity of its government. In recognition of these goals, there is hereby established a procedure for disclosure by certain officials and employees of private financial or other interests in matters affecting the City of St. Louis Mental Health Board of Trustees (hereafter "MHB").

Section 2. Conflicts of Interest.

- a. All appointed officials and employees of the MHB must comply with Section 105.454 of the Missouri Revised Statutes on conflicts of interest, to the extent applicable to the MHB, as well as any other state law governing their official conduct.
- b. Any Trustee of the MHB who has a "substantial or private interest" in any resolution, proposed or pending before the MHB must disclose that interest to the Secretary by April 1st if any such transaction occurred during the previous "calendar year" and such disclosure shall be recorded in the minutes. A "calendar year" is the period of time that commences on January 1 and terminates on December 31st of such year. "Substantial or private interest" is defined as ownership by the individual, or the individual's spouse, or dependent children, whether singularly or collectively, directly or indirectly of (i) 10 percent (10%) or more of any business entity; (ii) and interest having a value of \$10,000 or more; or (iii) the receipt of a salary, gratuity, or other compensation or remuneration of \$5,000 or more, per year from any individual, partnership, organization, or association within any calendar year.

Section 3. Disclosure Reports. The Executive Director and Trustees of the MHB shall disclose the following information by April 1st to the Secretary of the MHB and by May 1st to the Missouri Ethics

Commission is any such transaction occurred during the previous calendar year:

- a. For such person, and all persons within the first degree of consanguinity or affinity of such person, the date and the identities of the parties to each such transaction having a total value in excess of \$500, if any, that such person had with the MHB, other than compensation received as an employee or payment of any tax, fee or penalty due to the MHB, and other than transfers for no consideration to the MHB.
- b. The date and the identifies of the parties to each transaction known to the person having a total value in excess of \$500, if any, that a business entity in which such person had a substantial interest, had with the MHB, other than payment of any tax, fee or penalty due to the MHB or transactions involving payment for providing utility service due to the MHB, and other than transfers for no consideration to the MHB.

c. The Executive Director of the MHB shall disclose the following information by April 1st to the Secretary of the MHB and by May 1st to the Missouri Ethics Commission for the previous calendar year:

- 1. The name and address of each of the employers such person for whom income of \$1,000 or more was received during the year covered by the statement;**
- 2. The name and address of each sole proprietorship that he or she owned; the name, address and general nature of the business conducted of each general partnership and joint venture in which he or she was a partner or participant; the name and address of each partner or co-participant for each partnership or joint venture unless such names and addresses are filed by the partnership or joint venture with the Secretary of State; the name, address and general nature of the business conducted of any closely held corporation or limited partnership in which the person owned ten percent (10%) or more of any class of the outstanding stock or limited partnership units of such entity; and the name of any publicly traded corporation or limited partnership that is listed on a regulated stock exchange or automated quotation system in which the person owned two percent (2%) or more of any class outstanding stock, limited partnership units or other equity interests;**
- 3. The name and address of each corporate for which such person served in the capacity of a director, officer or receiver.**

Section 4. Filing of Reports.

- a. The financial interest statements shall be filed at the following times, but no person is required to file more than one financial interest statement in any calendar year:
 1. Every person required to file a financial interest statement shall file the statement annually no later than May 1st. The statement shall cover the calendar year ending the immediately preceding December 31st; provided that any Trustee of the MHB may supplement the financial interest statement to report additional interests acquired after December 31st, of the covered year until the date of filing of the financial interest statement.
 2. Each person appointed to office shall file the statement within 30 days of such appointment;

- b. Financial disclosure reports giving the financial information required in Section 3 shall be filed with the MHB and the Missouri Ethics Commission. The reports shall be available for public inspection and copying during normal business hours.

Section 5. Timing of Resolution. The MHB must biennially adopt this resolution at an open meeting by September fifteenth of the preceding year.

Section 6. Filing of Resolution. A certified copy of this resolution shall be sent to the Missouri Ethics Commission within ten (10) days of its adoption.

Section 7. Effective Date. This resolution shall be in full force and effect from and after the date of its passage and approval and shall remain in effect until amended or repealed by the Trustees of the MHB.

APPROVED AND ADOPTED THIS 16TH DATE OF JUNE, 2022.

**CITY OF ST. LOUIS MENTAL HEALTH
BOARD OF TRUSTEES**

By: _____
Board of Trustees President

ATTEST:

By: _____
Board of Trustees Secretary



**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
DISCLOSURE OF CONFLICT OF INTEREST
FROM SERVING ON THE BOARD**

It is important Trustees of the Mental Health Board avoid any appearance of impropriety in the exercise of their public duties. The Board is ultimately dependent on public confidence for its existence. Further, members of governing bodies of political subdivisions are subject to certain state conflict of interest laws.

State law (Sec. 210.861.3) relating to the Children's Fund states that no member of the board shall serve on the board of directors of any recipient entity, have a financial interest in, or be employed by a recipient entity. In addition, Sec. 205.987 relating to the mental health side, prohibits employees of any recipients of funding from serving on the Board.

In order to maintain public confidence in the Board's grant making process and to assist Trustees to avoid the possibility of serious legal consequences, it is recommended that all Board members disclose the possibility of conflict.

Attached is a list of organizations that are requesting funds from the Mental Health Board. On the lines below, please write below the names of those organization listed from which you receive compensation or expect to receive compensation. In addition, list the organization's names if you serve as an uncompensated member of the governing body; or serve in any other *policy making* or *administrative* role, compensated or uncompensated. Write "none", if it applies.

_____	_____
_____	_____
_____	_____

If you have listed any organization above, it is requested that you recuse yourself from the room when its application for funds is considered, and to abstain from any vote on its approval or disapproval. You may also abstain from any organization's vote if you feel that there is any other possibility of conflict. Please require that the minutes of the meeting reflect your recusion and abstention.

IN ADDITION, IF A GRANT IS APPROVED TO AN ENTITY AT WHICH YOU ARE EMPLOYED, YOU WILL HAVE TO IMMEDIATELY RESIGN THE BOARD. ALSO, IF YOU ARE ON THE BOARD OF DIRECTORS OF AN ENTITY RECEIVING CHILDREN'S FUND PROCEEDS, YOU WILL HAVE TO IMMEDIATELY RESIGN.

Trustees should feel free to consult on this matter, in confidence, with the Board's counsel, William Kuehling.

_____	_____
Trustee	Date



CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES

EMPLOYEE DISCLOSURE OF CONFLICT OF INTEREST

Section 7.1 of the MHB Contract with funded agencies states:

Conflict of Interest *In accordance with all applicable provisions of the laws of the State of Missouri, no official or employee of the MHB who exercises any functions or responsibilities in the review or approval of the undertaking or carrying out of the Scope of Work as described in Attachment A shall voluntarily acquire any personal interest, directly or indirectly, in the contract.*

7.3 It is expressly agreed that no officer or employee of the MHB has helped the Contactor obtain this contract or shall participate in the Contractor's performance of this contract, if such involvement will constitute a conflict of interest in violation of local ordinances or state and/or federal laws and regulations, or regulations and policies of this contract on behalf of the Contractor, approval must be obtained in advance from the executive director of the MHB. Under no circumstances shall an employee of the MHB be compensated under this contract for duties performed in the course of his/her employment with the MHB. Under no circumstances shall an employee of the MHB use MHB facilities or materials for personal gain relating to the performance of this contract.

As employees of a governmental entity, MHB employees, in the conduct of their public duties, are subject to federal, state laws and city ordinances regulating conflict of interest. MHB is ultimately dependent on public trust. It is critical that stakeholders view MHB employees as impartial and neutral when reviewing and recommending grant applications and monitoring performance. It is therefore important that employees of the St. Louis Mental Health Board avoid any appearance of conflict of interest in the exercise of their public duties.

In order to maintain public trust in MHB's grant making process and to assist employees to avoid the possibility of serious legal consequences, employees must disclose any conflict of interest.

Conflict of Interest—*A conflict occurs when a public employee, who has an interest in a particular matter, takes some official action that has a direct and predictable effect on that interest.*

Official actions of the employee that affect the interests of persons with a relationship to the employee, such as spouse, children or parents, may also trigger a conflict of interest.

A conflict of interest clearly occurs when an employee or a relative of the employee receives financial benefit or services from an agency under contract with MHB or seeks a contract with MHB and that employee is in a position to influence decisions concerning that contract. The value of the monetary benefit or services received, in this context, is of less concern than the influence that may be exercised on the awarding of a grant.

Examples of conflict are accepting services provided by the organization, with or without the payment of a fee to the organization or gifts, including tickets to sporting or cultural events, meals at expensive restaurants or private clubs. On the other hand, food or beverages provided for meeting participants, attendance at agency-sponsored events open to a broad audience and acceptance of token gifts, such as pens, key chains and mouse pads do not necessarily, and likely do not, create a conflict of interest.

Generally, employees should not accept free tickets to fund raising galas, unless MHB is being honored or is an event sponsor and complementary tickets are included with the sponsorship.

A conflict of interest also exists when an employee accepts a policymaking, administrative or consulting position with an agency under contract with MHB, or one seeking a contract with MHB, whether those responsibilities are compensated or not compensated. Employees are prohibited from providing training or technical assistance on the preparation of MHB applications for funding, other than those made available to all applicants in the MHB office.

Appearance of Conflict – *An appearance of conflict exists when a reasonable person will conclude from the circumstances that the employee's ability to act with impartiality is compromised.*

An MHB employee shall make every reasonable effort to avoid even the appearance of a conflict of interest. Appearance of conflict may occur without the employee's knowledge but is sufficiently apparent to others who may call into question that employee's ability to act with impartiality. **Situations which may impart the appearance of conflict can occur when employees volunteer for funded agencies, promote fund raising events of funded agencies, become overly familiar with key staff of funded agencies, and socialize after hours. Likewise, overtly laudatory or pejorative public commentaries about a funded agency's performance should be avoided.**

Disclosure Required: An employee shall disclose to the Executive Director any situation in which the employee has a real or potential conflict of interest or the appearance of a conflict of interest as soon as it becomes apparent. The Executive Director, in consultation with Board Counsel shall determine an appropriate way to manage the conflict (whether real, potential, or the appearance of), and assure that MHB business is not improperly influenced or adversely affected. If there is no reasonable way to manage, i.e., withdraw from the conflict, then the employee may be prohibited from participating in related activities, or may be assigned to other activities.

Procedure for Disclosure: An employee shall disclose conflicts of interest (whether real, potential or the appearance of conflict) in writing, and shall include a brief statement of the nature and extent of the conflict or the circumstances leading to the conclusion that there is the appearance of a conflict. The Executive Director shall evaluate the situation, in consultation with the Board Counsel, if necessary, and advise the employee what action will be taken, if any. In the event the Executive Director determines that an employee has a real conflict of interest, the Executive Director shall promptly inform the Personnel Committee, in Executive Session, of the circumstances of the situation and action that has been taken.

Remaining free of conflict of interest and disclosing it as soon as one becomes aware of it, is a pillar of ethical public service. Failure of any MHB employee to disclose actual or appearance of conflict is a breach in ethical behavior which may harm the entire organization by jeopardizing its reputation and future stability. Such breaches subject the employee to appropriate disciplinary action, up to and including termination.

APPROVED THIS 21ST DAY OF JANUARY 2010

I have received a copy of the MHB Employee Conflict of Interest Policy, have read and understand it and agree to comply with it.

I am aware of the following conflict of interest, potential conflict or appearance of conflict:

Employee Name

Date Submitted

Tax Rate Setting Sample Resolutions

Community Mental Health Fund

RESOLUTION SETTING [REDACTED] TAX RATE COMMUNITY MENTAL HEALTH FUND

BE IT RESOLVED, by the City of St. Louis Mental Health Board of Trustees (the “Trustees”), as follows:

1. **WHEREAS**, that pursuant to law, the Trustees have estimated the amount needed to be raised by taxation for the 20 [REDACTED] -20 [REDACTED] fiscal year for the Community Mental Health Fund, the tax rate required to produce that amount and to provide the funds to meet other legitimate needs of the Trustees; and
2. **WHEREAS**, the voters of the City of St. Louis, on November 3, 1992, approved Proposition CARE, which authorized a tax levy rate of Nine Cents (\$0.09) on each One Hundred Dollars (\$100.00) assessed valuation.
3. **WHEREAS**, the Trustees hereby find and determine that the rate of taxation for the 20 [REDACTED] calendar year shall be the maximum amount presently authorized (\$0.09 on each \$100.00 assessed valuation) reduced by the amount required by application of the tax reassessment rollback or reduction provisions of Article X, Section 22 of the Missouri Constitution and of Section 137.073 RSMo., resulting in a rate of \$ [REDACTED] on each One Hundred Dollars (\$100.00) assessed valuation on all real, personal and other taxable property within the District, provided however, the tax rate stated herein may be increased by the recoupment process pursuant to section 137.073.3 (2)(a) and (b) RSMo.;
4. **WHEREAS**, the Assessor of the City of St. Louis and all other officers in said City charged by law with the assessment of taxes due on or before December 31, 20 [REDACTED], and they are hereby required and directed to enter the tax shown in Section 3 of this Resolution, upon the assessment books of taxable property in the City before delivering the same to the Collector of Revenue of the City of St. Louis for collection; and
5. **WHEREAS**, the Secretary/Treasurer of the Trustees be directed to furnish a copy of this Resolution, duly certified according to law, to the Comptroller, the City Registrar, the Collector of Revenue, the Assessor, and the License Collector of the City of St. Louis and the Chair and Secretary/Treasurer be authorized to execute any other documents required to effectuate this tax rate.

ADOPTED by the City of St. Louis Mental Health Board of Trustees this [REDACTED] day of September 20 [REDACTED].

[REDACTED], Chair, Board of Trustees

ATTEST:

[REDACTED], Executive Director

Community Children's Services Fund

RESOLUTION SETTING [REDACTED] TAX RATE COMMUNITY CHILDREN'S SERVICES FUND

BE IT RESOLVED, by the City of St. Louis Mental Health Board of Trustees (the "Trustees"), as follows:

6. **WHEREAS**, that pursuant to law, the Trustees have estimated the amount needed to be raised by taxation for the 20__-20__ fiscal year for the Community Children's Services Fund, the tax rate required to produce that amount and to provide the funds to meet other legitimate needs of the Trustees; and

7. **WHEREAS**, the voters of the City of St. Louis, on November 2, 2004, approved Proposition K, which authorized a tax levy rate of Nineteen Cents (\$0.19) on each One Hundred Dollars (\$100.00) assessed valuation.

8. **WHEREAS**, the voters of the City of St. Louis, on November 3, 2020, approved Proposition R, which authorized a tax levy rate increase of Six Cents (\$0.06) on each One Hundred Dollars (\$100.00) assessed valuation.

9. **WHEREAS**, the Trustees hereby find and determine that the rate of taxation for the 20__ calendar year shall be the maximum amount presently authorized (\$0.25 on each \$100.00 assessed valuation) reduced by the amount required by application of the tax reassessment reduction provisions of Article X, Section 22 of the Missouri Constitution and of Section 137.073 RSMo., resulting in a rate of \$[REDACTED] on each One Hundred Dollars (\$100.00) assessed valuation on all real, personal and other taxable property within the District, provided, the tax rate stated herein may be increased by the recoupment process pursuant to section 137.073.3 (2)(a) and (b) RSMo;

10. **WHEREAS**, the Assessor of the City of St. Louis and all other officers in said City charged by law with the assessment of taxes due on or before December 31, 20__, and they are hereby required and directed to enter the tax shown in Section 3 of this Resolution, upon the assessment books of taxable property in the City before delivering the same to the Collector of the City of St. Louis for collection; and

11. **WHEREAS**, the Secretary/Treasurer of the Trustees be directed to furnish a copy of this Resolution, duly certified according to law, to the Comptroller, the City Registrar, the Collector of Revenue, the Assessor, and the License Collector of the City of St. Louis and the Chair and Secretary/Treasurer be authorized to execute any other documents required to effectuate this tax rate.

ADOPTED by the City of St. Louis Children's Services Board of Trustees this [REDACTED] day of September 20__.

[REDACTED], Chair, Board of Trustees

ATTEST:

[REDACTED], Executive Director

MISSOURI SUNSHINE LAW

Sunshine Law—A Commitment to Openness and Transparency in Government

In 1973, Missouri was one of the earliest advocates of openness in government through its passage of Senate Bill 1 also known as the Sunshine Law (Section 610.011 RSMo.). The Sunshine Law is Missouri's public policy that meetings, records, votes, actions, and deliberations of public governmental bodies be open to the public unless otherwise provided by law. The law sets out limited circumstances when meetings, records, and votes may be closed, while stressing that these exceptions are to be strictly interpreted to promote the public policy of openness.

Public meetings, including meetings conducted by telephone, internet, or other electronic means are to be held at reasonably convenient times and must be accessible to the public. Meetings should be held in facilities that are large enough to accommodate anticipated attendance by the public and accessible to persons with disabilities.

Sunshine Law—Top 10 Things You Should Know

1. When in doubt, a meeting or record of a public body should be opened to the public.
2. The Sunshine Law applies to all records, regardless of what form they are kept in, and to all meetings, regardless of the manner in which they are held.
3. The Sunshine Law allows a public body to close meetings and records to the public in some limited circumstances, but it almost never requires a public body to do so.
4. Except in emergency situations, a public body must give 24 hours' public notice before holding a meeting. If the meeting will be closed to the public, the notice must state the specific provision within Section 610.021, RSMo., that allows the meeting to be closed.
5. Each public body must have a written Sunshine Law policy and a custodian of records whose name is available to the public upon request.
6. The Sunshine Law requires a custodian of records to respond to a records request as soon as possible but not later than three business days after the custodian receives it.
7. The Sunshine Law deals with whether a public body's records must be open to the public, but it generally does not state what records the body must keep or for how long. A body cannot, however, avoid a records request by destroying records after it receives a request for those records.
8. The Sunshine Law allows for public meetings to be both audio and video recorded by attendees. Each public governmental body may set up guidelines regarding the recording process. These guidelines can be found in the body's Sunshine Law policy. No one is allowed to record a closed meeting, if they are not given permission to do so.
9. When responding to a request for copies of its records, the Sunshine Law limits how much a public body can charge – per page, and per hour – for copying and research costs.
10. There are specific provisions governing access to law enforcement and judicial records.

Public Policy Favoring Openness

Except when closure is allowed by law, all public meetings and public records of public governmental bodies must be open and available to the public, and all of their public votes shall be recorded. Meetings and records of public governmental bodies may (though not "shall") be closed for the reasons listed in Section 610.021, RSMO. (including but not limited to, privileged discussions with a body's lawyers or auditors, certain personnel matters, sealed bids until opened, social security numbers, and certain public safety, security system, and computer access information.)

The Sunshine Law applies to “public governmental bodies” – virtually all arms of state and local government, as well as “quasi-public governmental bodies,” which are persons or corporations which, primarily, enter into contracts with public governmental bodies, accept public funds, or perform public functions. Subcommittees appointed to make recommendations to public bodies are also covered by the law.

Each public governmental body must have a written Sunshine Law policy available to members of the public, and a Custodian of Records whose name is available to the public upon request.

Enforcement of the Sunshine Law

A lawsuit to enforce the Sunshine Law may be brought by any citizen, county prosecutor, or the Attorney General, in the circuit court of the county where the public governmental body has its principal place of business. Suit must be filed within one year from when the violation is ascertainable, and in no event later than two years after the violation occurred.

Statute provides specific consequences for violating the Sunshine Law. “Knowing” violations result in civil fines up to \$1,000.00. “Purposeful” violations result in civil fines up to \$5,000.00, plus attorney’s fees. Injunctive relief is also available. When the public interest requires, courts may void actions taken in violation of the Sunshine Law.

Complaints and concerns regarding enforcement of Missouri’s Sunshine Law may be directed to the Missouri Attorney General’s Office or any local prosecuting attorney.

Meetings of Public Government Bodies

Meetings of public governmental bodies, where a quorum is present, and public business is discussed, are subject to Sunshine Law. This includes telephone conferences, and internet chat sessions, as well as meetings, or a series of meetings. Each involving fewer than a quorum of the members, but collectively involving a quorum of the public body, where the body’s members deliberately attempt to discuss public business while evading the Sunshine Law.

Notice of all meetings must be posted at least 24 hours in advance. If the meeting will be conducted by telephone, or by other electronic means, the notice must identify how the meeting will be conducted, as well as instructions explaining how the public may observe.

Notices of open meetings must contain the **date, time, place, and tentative agenda** of the meeting.

Notices of closed meetings must contain the date, time, and place of the meeting, and the specific reason in Section 610.021, RSMo., that allows for closing the meeting. In closed meetings, only business directly related to the reason for closure may be discussed. Roll call votes must be taken on the motion to close a meeting, and each vote during a closed meeting must be a roll call vote, with each vote recorded in the meeting minutes.

Meeting minutes must record the date, time, and place of the meeting, the members present and absent, and records of all votes taken. Topics about which members of the public did not receive at least 24 hours’ notice should not be discussed during the meeting, unless it is impossible or impractical to provide

24 hours' notice, in which case the reason for not providing 24 hours' notice must be noted in the minutes.

Public governmental bodies are required to allow recording at open meetings, though they may set rules within their Sunshine Law policy to minimize disruption. Recording a closed meeting without permission of the public governmental body is a class C misdemeanor.

While the Sunshine Law mandates that most meetings of public government bodies shall be open to the public, it does not require that members of the public be permitted to speak at these meetings.

Records of Public Government Bodies

Records prepared or retained by or for public governmental bodies are subject to the Sunshine Law. Law enforcement records are subject to the same presumption of openness applicable to other public records and receive separate treatment under the Sunshine Law.

Record requests should be directed to a public governmental body's Custodian of Records. While not required, it may be helpful to submit requests in writing. A request for general information or stray data is not necessarily the same thing as a request for records unless that information or data is found within an existing record. Requests should be prepared carefully and precisely, and the best practice is to cite Chapter 610, RSMO., in a written request. Public governmental bodies are not required to create records in order to respond to a records request.

The Custodian of Records must respond to requests within three business days, by: (1) providing the requested records; (2) informing the requestor that the records sought are closed, and citing the proper provision for closure; or, (3) explaining the cause of the delay and estimating when the records will be provided. The day a request is received by the Custodian of Records does not count as one of the three business days. The time for providing access may exceed three business days for reasonable cause.

Public governmental bodies are strongly encouraged to make information available in useable electronic formats, and requests that records be provided in a particular format must be honored if the public governmental body is able to produce the record in the format requested.

If the Custodian of Records determines that the requested records are closed, then he or she must explain the reason for the closure in writing, citing the specific provision permitting closure, within three days of request for explanation.

If a record contains both open and closed material, access must be provided to the open material.

Charges Allowed

Copy fees of not more than 10 cents per page 9" x 14", or smaller, plus research time, (billed at actual cost of employees that result in the lowest amount of charges for search, research, and duplication time), are allowed. Persons requesting public records may request an estimate of the cost. Public governmental bodies may require advance payment of fees and may also decide to reduce or waive fees in the public interest.

Brief Summary Regarding Law Enforcement Records

Records relating to law enforcement operations are addressed in a specific set of statutes within Chapter 610. In general, all incident and arrest reports are open records, but mobile video recordings and investigative reports are closed records until the investigation becomes inactive, as is an arrest record if the person arrested is not charged within 30 days. Other exceptions apply with respect to certain mobile video recordings and portions of records which, if released, would endanger victims, witnesses, undercover officers, or other persons, or which would jeopardize a criminal investigation. Special rules apply to information gained from 911 calls, and particularly graphic crime scene photographs and videos are generally closed.

Conclusion

Again, this brief Summary is included in order to give a broad understanding of Sunshine Law basics. Before making any decision on behalf of a public governmental body, be sure to review all relevant sections within Chapter 610, RSMo.

FAQs—Public Governmental Body

1. **How much can a public governmental body charge for records request?** Section 610.026.1(1), RSMo., allows a public governmental body to charge up to 10 cents per page for standard paper copies, the average hourly rate for clerical staff to duplicate documents, and the actual cost of the research time for fulfilling the request. This provision also requires that the public governmental body use the lowest salaried employees capable of searching, researching, and copying the records. Fees for accessing records on other media, or non-standard paper copies, shall reflect actual cost involved. The requestor may wish to ask for a breakdown of all costs associated with the request to determine how the public governmental body arrived at the final charge.
2. **Our board goes in to closed session and we don't know what they are going to talk about. Don't they have to let us know why they are closing the meeting?** Yes. Section 610.022, RSMo., requires that public governmental bodies give at least 24 hours' notice of each proposed closed meeting and the reason for holding it by reference to the specific exception allowed under Section 610.021, RSMo. Section 610.022, RSMo., also states that **no public governmental body can move from an open meeting into a closed meeting without a roll call vote, and that the vote and the specific section of 610.021, RSMo., shall be publicly announced and entered into the minutes.**
3. **I was told my request would be ready in 2 weeks. Doesn't the Sunshine Law say they have to give me the records in 3 days?** Section 610.023.3, RSMo., requires that each request be responded to as soon as possible, but not later than the end of the third business day following the custodian of records' receipt of the request. If access is not granted immediately, the custodian of records is required to explain the reason for the delay and the earliest date and time the records will be available. Therefore, public governmental bodies are allowed to exceed the three days for production, but they are required to notify you of the delay and explain when they anticipate the records will be ready.
4. **Can a public governmental body add items to the agenda after it has been posted?** Section 610.020.1, RSMo., requires public governmental bodies to post a notice and a tentative agenda for each meeting, and that the agenda be constructed in a manner reasonable calculated to

advise the public of the matters to be considered. Further, Section 610.020.2, RSMo., requires that this notice be posted at least 24 hours in advance of the meeting. However, Section 610.020, RSMo., includes an exception that, if for good cause, 24-hours' notice is impossible or impractical, the public governmental body shall give as much notice as possible. Also, the nature of the good cause justifying the departure from normal requirements shall be stated in the minutes.

5. **Members of the board get together and talk about business outside of meetings. Is that a violation?** Under the Sunshine Law, a meeting takes place when a majority or quorum of a public governmental body gathers to discuss or vote on public business (Section 610.010(5), RSMo., and *Colombo v. Buford*, 935 S.W.2d 690 (MO. App. W.D. 1996)). Therefore, if less than a quorum of the public body meets to discuss public business, it is not a "meeting" as defined under the Sunshine Law. However, the Sunshine Law will apply to meetings of groups with less than a quorum when the entity is deliberately attempting to evade the Sunshine Law. See, *Colombo*, cited above. For example, a public governmental body may not purposely meet in groups with less than a quorum to discuss public business and then ratify those decisions in a subsequent public meeting.
6. **Board members e-mail each other about public business—is that considered a meeting?** Pursuant to Section 610.010(5), RSMo., a public meeting exists when a public body meets and public business is discussed, decided, or public policy is formulated. A single e-mail about an issue would not in and of itself constitute a meeting requiring advance notice. However, by Section 610.025, RSMo., any member of a public governmental body who sends an e-mail relating to public business to a majority of the body shall also send a copy to the member's public office computer or to the custodian of records to be retained as a public record.
7. **A requestor refuses to use our request form and sends numerous e-mails with requests for records. Can we require that they fill out our standard request form?** Section 610.023.3, RSMo., requires that each request for access to public records is to be responded to as soon as possible; it does not specify a manner in which these requests must be submitted. Therefore, a public governmental body may ask that requestors fill out a form, but it can't require them to do so.
8. **Who can impose penalties for Sunshine Law violations?** Only a court can impose penalties if it finds that the Sunshine Law has been violated, and penalties are assessed only if the violation is found to be knowing or purposeful. A court may also void any action that was taken in violation of the law, but it is at the court's discretion, after considering if it is in the public interest to do so.
9. **How may we state our motion when we want to enter into a closed session?** One sample motion is "I move that this meeting be closed, and that all records and votes, to the extent permitted by law, pertaining to and/or resulting from this closed meeting be closed under Section 610.021, subsection(s)____, RSMo., for the purpose of (insert the language of the provisions(s) cited)."

Please note that the public governmental body should only cite those subsections that are applicable to the material it intends to close (not a standard list of several subsections).

10. **Who is subject to the Sunshine Law?** To determine if the Sunshine Law applies to a body, refer to the definition of public governmental body in Section 610.010, RSMo., p. 4, which includes, but is not limited to:

- Public bodies created by state constitution or statutes;
- Public bodies created by order or ordinance of any political subdivision or district;
- Judicial entities when operating in an administrative capacity;
- Public bodies created by executive order, including:
 - ✓ Any advisory committee or commission created by the governor by executive order;
 - ✓ Any department or division of the state;
 - ✓ Any department or division of any political subdivision of the state;
 - ✓ Any department or division of any county or of any municipal government
 - ✓ Any department or division school district;
 - ✓ Any department or division of a special purpose district including but not limited to sewer districts and water districts; and
 - ✓ Other subdistricts of any political subdivision;
- Any other legislative or administrative governmental deliberative body under the direction of three or more elected or appointed members having rulemaking or quasi-judicial power; and
- Certain committees or advisory boards appointed by any of the above entities. **Note:** The custodian of records of any public governmental body shall maintain a list of the policy advisory committees described in this section.

Or, a body may qualify as a quasi-governmental body under the Sunshine Law, which is defined in Section 610.010(4), RSMo., p. 5, and includes, but is not limited to:

- Any person, corporation or partnership organized or authorized to do business in this state by the provisions of chapter 352, 353, 355, RSMo., or an unincorporated association with either:
 - I. Has it primary purpose to:
 - ✓ Enter into contracts with public governmental bodies; or
 - ✓ Engage primarily in activities carried out pursuant to an agreement or agreements with public governmental bodies; or
 - II. Performs a statutorily based public function to:
 - ✓ Allocate or issue tax credits, tax abatement, public debt, tax-exempt debt, rights of eminent domain; or
 - ✓ Contract leaseback agreements on structures whose annualized payments commit public tax revenues.
- Any association that directly accepts the appropriation of money from a public governmental body, but only to the extent that a meeting, record, or vote relates to such appropriation.

OTHER BOARD POLICIES

Conflict of Interest/Nepotism

Policy No: 1

CONFLICT OF INTEREST/NEPOTISM

Trustees of the board may not become interested in any contract with or claim against the board of trustees, directly or indirectly, or as agent or employee of any individual, firm or corporation which is so interested.

In addition, trustees are subject to certain portions of the statewide conflict of interest statutes contained in section 105.450 through 105.482 RSMo. The statutes prohibit such conduct as:

1. A trustee (or a business in which a trustee owns a substantial interest) performing services for the board of trustees for compensation;
2. A trustee (or a business in which a trustee owns a substantial interest) selling, renting or leasing property to the district and receiving payment therefor;
3. A trustee attempting to influence a decision of the board by reason of a payment, promise to pay or receipt of anything of value;
4. A trustee using or disclosing to others confidential information obtained in an official capacity for personal financial gain;
5. A trustee performing services for any person or business for compensation, either while a trustee or during a one-year period following termination in office, by which performance such trustee attempts to influence a decision of the board;
6. A trustee participating in any matter, directly or indirectly, in which the trustee attempts to influence any decision when the trustee knows that the result of such decision may be the acceptance of the performance of a service of the sale of any property to the board for consideration to the trustee, the trustee's spouse, a dependent child or any business with which a trustee is associated.

The foregoing represents only a general statement of prohibited activities and is described for informational purposes only. Trustees are governed by the exact offenses which are contained in section 105.450 through 105.482 RSMo. Factors such as the amount of dollars involved and whether there has been competitive bidding are sometimes significant.

Whenever a possible conflict arises, it is advisable for the trustee to seek a legal opinion for its attorney.

The board shall not employ any of its members nor shall it employ any person who is related within the 4th degree to any board member, either by consanguinity or affinity, where the vote of the trustee is necessary for the appointment of the person.

In the event that the individual is recommended for appointment by the executive director and the individual is related within the 4th degree to a trustee of the board, the trustee shall declare his/her interest

and refrain from debating or voting upon the question of appointment.

Policy adopted: 2-14-94

mhbp.11

REMUNERATION AND REIMBURSEMENT

Trustees, on authorization and approval of the board may be reimbursed for actual, reasonable and necessary expenses incurred in the performance of official duties as board members.

Payment of an expense should be approved only when it has actually been incurred by the trustee, is reasonable in amount and is necessary to the trustees performance of his or her official duties. Expenses which do not directly related to official business or which do not have direct benefit to the board, including but not limited to entertainment expenses, should be borne by the individual and not the board of trustees.

In appropriate cases, the treasurer is authorized to advance monies to trustees for anticipated expenses. The advance, which may include a maximum of fifty dollars per day for meals and miscellaneous expenses (not including lodging), shall not be greater than the anticipated expenses. Following the trip or other activity, the trustee shall promptly return all monies not needed and shall promptly certify and filed the necessary expense reports.

Appropriate forms and receipts must be submitted to the full board for review and approval at a scheduled meeting. Upon the board's approval, the chairperson will authorize reimbursement by means of his/her signature on the appropriate form.

Policy Adopted: 2-14-94

mhhbp.9

PUBLIC AND CLOSED MEETINGS/EXECUTIVE SESSIONS

All meetings of the board, whether corporeal or by means of communication equipment, at which any public business is discussed, decided or public policy formulated, shall be open, public meetings, except when a closed meeting is held in accordance with law. Public business includes all matters which related in any way to the performance of the board's functions or the conduct of business.

The Board reserves the right to sit in closed meetings/executive sessions on matters which are authorized by Sec. 621.021 RSMo., as enumerated below:

1. Legal actions, cause of action or litigation involving the board and any confidential or privileged community between the board or its representatives and its attorneys. However, any minutes or vote relating to litigation involving the board shall be made public upon final disposition of the matter voted upon provided however, in matters involving the exercise of the power of eminent domain, the vote shall be announced or become public immediately following the action of the motion to authorize institution of such a legal action. Legal work product shall be considered a closed record:
2. Leasing, purchase or sale of real estate by the board where public knowledge of the transaction might adversely affect the legal consideration therefor. However, any minutes or vote or public record approving a contract relating to the leasing, purchase or sale of real estate by the board shall be made public upon completion of the lease, purchase or sale of the real estate.
3. Hiring, firing, disciplining or promoting of particular employees by the board when personal information about the employee is discussed or recorded. As used in this bylaw, the term "personal information" means information relating to the performance or merit of individual employees. However, any vote on a final decision, when taken by the board, to hire, fire, promote or discipline an employee of the board must be made available to the public within 72 hours of the close of the meeting where the action occurs; provided however, that any employee so affected shall be entitled to prompt notice of such decision during the 72 hour period before such decision is made available to the public;
4. Nonjudicial mental or physical health proceedings involving identifiable persons, including medical, psychiatric, psychological, or alcoholism or drug dependency diagnosis or treatment;
5. Preparation, including any discussions or work product, on behalf of the board or its representatives for negotiations with employee groups.
6. Software codes for electronic data processing and documentation thereof;
7. Specification for competitive bidding, until either the specifications are officially approved by the board or the specifications are published for bid;

8. Sealed bids and related documents, until the earlier of either when the bids are opened, or all bids are accepted or all bids are rejected;
9. Individually identifiable personnel records, performance rating or records pertaining to employees or applicants for employment, except that this exemption shall not apply to the names, positions, salaries and lengths of service of officers and employees of the board once they are employed as such;
10. Records which are protected from disclosure by law;
11. Meetings and public records relating to scientific and technological innovations in which the owner has a proprietary interest.

Before a meeting of the board may be closed, the reason for holding the executive session shall be announced and a roll call vote on the questions of holding executive session will be taken in open session.

Only business directly related to the specific exemptions may be discussed at a closed meeting/executive session or have a closed record or vote. The closing of executive sessions and all records, votes and minutes resulting from executive sessions shall be determined by a majority vote of the quorum for the board in public session. IF the board so votes, a separate minute book used solely for the purposes of executive session shall be used to record the minutes. The board may invite the executive director and/or staff members or others to attend such executive session at its discretion.

References: Section 610.021 RSMo 2-14-94

NOTIFICATION OF PUBLIC MEETINGS

The general public shall be given written notice of the date, time, and place of each meeting of the board, as well as that of any committee meetings, at least 24 hours in advance, exclusive of weekends and holidays, except in instances of emergencies.

The Chairperson of the board, or the executive director shall determine when emergencies exist that require meetings to be called with less than 24 hours' notice.

Notice to the public shall include posting in an area of access to the public at the office of the board. Notice of meetings of the board shall also be made available on a regular basis to any representative of the news media who has requested notice of such meetings.

References: Chapter 610 RSMo

Policy Adopted: 2-14-94

mhhbp.7

ST. LOUIS CITY MENTAL HEALTH BOARD OF TRUSTEES

RESOLUTION NO. 5

WHEREAS, Section 610.023.1 RSMo., provides that a public governmental body is to appoint a custodian who is to be responsible for the maintenance of that body's records and the identity and location of the custodian is to be made available upon request, and

WHEREAS, Section 610.026, RSMo., provides that a public governmental body may prescribe reasonable fees for providing access to or furnishing copies of public records, however, the fees shall not exceed the actual cost of document search and duplications; and

WHEREAS, Section 610.028.2 RSMo., provides that a public governmental body shall provide a reasonable written policy in compliance with section 610.010 to 610.030, RSMo., commonly referred to as the Sunshine Law, regarding the release of information on any meeting, record, or vote;

NOW, THEREFORE, BE IT RESOLVED:

1. That Cassandra Kaufman, Executive Director be and hereby is appointed custodian of the records of the St. Louis City Mental health Board of Trustees and that such custodian is located at: 333 South 18th Street, Suite 200, Annex at Union Station, St. Louis, MO 63103.
2. That said custodian shall respond to all requests for access to or copies of a public record within the time period provided by statute except in those circumstances authorized by statute.
3. That fees to be charged for access to or furnishing copies of records shall be as hereinafter provided, which fees have been determined not to exceed the actual costs of document search and duplication.
4. That it is the policy of the St. Louis City Mental Health Board of Trustees that meetings, records, votes, actions and deliberations of this body shall be open to the public unless otherwise provided by law.

That the City of St. Louis Mental Health Board of Trustees shall comply with section 610.010 to 610.030, RSMo., the Sunshine Law, as now existing or hereafter amended.

APPROVED this 10 day of February, 1994

COMMUNICATIONS WITH THE PUBLIC

The Board, as a representative body of the citizens of the City of St. Louis, wishes to provide an avenue for the public to express their interest in t and concerns about the operations of the board. Accordingly, the public is invited to attend any and all sessions of the board and raise issues of concern before the meeting begins. The public may not participate during the actual board meeting except as provided for in this policy. The public will be afforded a period of time at the start of board meetings to speak before the board. Members of the public may sign up to speak in the order they signed up. Up to three members of the public will be allowed to speak on a particular subject and each person may speak for a period of up to three minutes. All speakers will receive a written response at a later date, although the board President may respond to issues raised at the time of the meeting. In order to protect the decorum and order of the board, the board retains the right to deny any member of the public the opportunity to speak at a meeting.

Policy adopted: 6-9-94

mhhbp.17

MEETING ATTENDNACE

Attendance shall be recorded at each Regular and Special Board meeting. Annually, in conjunction with the annual summary of Board activity, it shall be sent to the Mayor.

Absences shall be either excused or unexcused. An excused absence is one in which the trustee has communicated their intended absence to the President, Executive Director or the Administrative Assistant. An unexcused absence is one in which the trustee fails to communicate their intended absence to the designated MHB representatives.

Three unexcused absences within each fiscal shall constitute *de facto* resignation.

Policy adopted January 21, 1999

BY-LAWS

AMENDED AND RESTATED BY-LAWS
OF
THE ST. LOUIS MENTAL HEALTH BOARD AND
COMMUNITY CHILDREN'S FUND BOARD OF TRUSTEES

ADOPTED
November 16, 2006

ARTICLE I

Effective Date of By-Laws

The effective date of these Amended and Restated By-Laws shall be November 16, 2006 and shall supersede any other or prior By-Laws adopted by the Board of Trustees.

ARTICLE II

Name

The name of this organization shall be the St. Louis Mental Health Board. The Board of Trustees may conduct its mental health board activities and community children's services fund activities under the name "St. Louis Mental Health Board" or "Mental Health Board".

ARTICLE III

Purpose

The purposes for which this organization is established are:

Mental Health Board Activities:

- (a) Providing necessary funds to establish, operate, and maintain community mental health centers, mental health clinics, or any comprehensive mental health services; and
- (b) Providing funds to supplement existing funds for the operation and maintenance of community mental health centers, mental health clinic, or any comprehensive mental health services; and
- (c) Purchasing any of the comprehensive mental health services from community mental health centers, mental health clinics, and other public facilities or not-for-profit corporations which are designated by the department.

Community Services Children's Fund Activities:

To provide funds for counseling and related services to children and youth which will promote healthy lifestyles and strengthen families, as provided pursuant to Section 210.801 RSMo. 2004 as may be amended.

ARTICLE IV

Offices

The principal office of the organization shall be located at 333 S. 18th Street, Suite 200, St. Louis, Missouri, 63103, or at such other office or offices, as the purposes of the organization may require from time to time.

ARTICLE V

Board of Trustees of Mental Health Board; Trustees to Serve on Community Children's Services Fund

1. The Board of Trustees shall serve as the Trustees of the Mental Health Board and shall fulfill the duties and seek to provide the services as pursuant to Section 205.975, RSMo., et seq., 2004, as may be amended.
2. The Board of Trustees shall also serve as Trustees of the Community Children's Services Fund and shall fulfill the duties and seek to provide the services as pursuant to Section 210.860, RSMo., et seq., 2004, as may be amended.
3. The Board of Trustees to serve as the Mental Health Board and as over the Community Children's Services Fund shall be comprised, as determined by the Board of Trustees of not less than nine members, and not to exceed fifteen, appointed by the governing body of the City of St. Louis, Missouri.
4. At least one-half of the members of the Board of Trustees shall be individuals who are not providers of health services.
5. At least one member shall be a licensed physician.
6. No more than one-third of the members shall represent public or private entities involved in the provision of services as detailed in Section 205.975, RSMo., 2004, as may be amended. At least one-third of the members shall represent consumers of psychiatric services or the families of such consumers.
7. The members of the Board of Trustees shall be generally representative of the residents of the City of St. Louis, taking into consideration their employment, race, age, sex, and place of residence, and other demographic characteristics of the City of St. Louis.
8. The Board of Trustees shall serve as the policy making body, and responsible for the operations, of the St. Louis Mental Health Board and the Community Children's Services Fund.
9. The terms of office for members of the Board of Trustees shall be and remain as staggered terms after the initial terms determined by the governing body of the City of St. Louis. All terms for members of the Board of Trustees shall be for three years.
10. Any member of the Board of Trustees serving his or her term of office when such three-year term shall have expired, shall continue in office to serve as a member of the Board of Trustees until such time as such office shall be duly re-appointed. Provided, however, that any vacancy in the office of a member of the Board of Trustees, whether by reason of absence, illness, or death of a member, may be filled as provided for in State Statute.
11. The Board of Trustees shall be the policy making body of the St. Louis Mental Health Board and shall be responsible for overseeing its operations.

ARTICLE VI

Officers; Election and Installation Votes and Meetings

1. The officers of the Board of Trustees shall be a Chairman, Vice-Chairman, and Secretary/Treasurer, and
 - (a) Each of these offices shall be held for a term of one year.
 - (b) In the event that an officer cannot fulfill his or her term of office, the Board of Trustees shall elect a success officer to fill the remaining term.
2. A meeting shall be held in the month of March each year at which the Nominating Committee, as provided for herein, shall present a slate of one or more candidates for each office. Further, nominations may be made from the floor. The election shall be by written ballot and a plurality vote of total Board of Trustee membership to elect. If there is but one candidate for an office, the election may be by voice vote.
3. A meeting shall be held in the month of April each year at which all officers of the Board of Trustees shall be installed into office.
4. The officers shall perform the duties usually pertaining to their respective offices, including, but not limited to, as follows:
 - (a) The Chairman shall preside at all meetings of the Board of Trustees, and shall sign any contracts or other instruments which the Board of Trustees have authorized to be executed, except in cases where the signing and execution thereof shall be expressly required by law or other regulation to be otherwise signed or executed; and in general, shall perform personally or through a designee all duties incident to the office of Chairman and such other duties as may be prescribed by the Board of Trustees from time to time.
 - (b) The Vice-Chairman shall, in the absence of the President or in the event of the President's inability to act, the Vice-Chairman shall perform the duties of the Chairman, and when so acting, shall have all the powers of and be subject to all the restrictions upon the Chairman.
 - (c) The Secretary/Treasurer shall: (a) have charge and custody of and be responsible for all funds and securities of the organization; ensure such banks, trust companies or other depositories shall be selected in accordance with the provisions of Article XI of these By-Laws; (b) keep the minutes of the Board of Trustee meetings in one or more books provided for that purpose; (c) see that all notices are duly given in accordance with the provision of these By-Laws or as required by law and (d) in general, shall perform personally or through a designee, all the duties incident to the office of Secretary/Treasurer and such other duties as from time to time may be assigned by the Chairman or by the Board of Trustees.
5. Any officer elected or appointed to the Board of Trustees may be removed, upon a two-thirds vote of the Board of Trustees as an officer – not as a Trustee, by the Board of Trustees whenever, in the judgment of the Board of Trustees, the best interests of the organization would be served thereby.

6. A vacancy in any office due to the absence, illness, death, resignation, removal, disqualification, or otherwise, of the officer, may be filled by the Board of Trustees for the unexpired portion of the term.

ARTICLE VII

Meetings, Quorums and Voting

1. Regular meetings of the Board of Trustees shall be held monthly for the conduct of the business of the Board of Trustees; provided, however, the regular meetings may be rescheduled and/or cancelled by the Chairman due to the availability of matters to be passed upon and for the convenience of member Trustees.
2. The Secretary/Treasurer or designee shall post the notice and agendas of all regular and special-called meetings prior to the meeting in accordance with the requirements of the Missouri Sunshine Law (Chapter 610, RSMo.).
3. A simple majority of the Board of Trustees in office (excluding vacancies) shall constitute a quorum.
4. Special meetings of the Board of Trustees may be called at the discretion of the Chairman. Notice and agendas for such meetings shall be posted by the Secretary/Treasurer or designee in accordance with Missouri Sunshine Law.
5. Meetings may be held by means of communication equipment; provided, however, that all meetings which are "open meetings" pursuant to the Missouri Sunshine Law must accommodate the general public desiring to listen or observe the meeting, and otherwise comply with the Missouri Sunshine Law.
6. The Chairman of the Board of Trustees shall be a voting member of the Board.
7. A majority of all votes in favor of a matter shall be required to pass any measure before the Board, except as may be otherwise specifically provided by the By-Laws or state law. Members should recuse themselves from participating in and abstain from voting upon any measure in which such members have a substantial personal or private interest, as defined by state law. An abstention vote shall not be counted as a vote in favor of nor against a measure.
8. The Board of Trustees shall keep correct and complete books and records of account and shall also keep minutes of the proceedings, in whatever form or media deemed appropriate, of the Board of Trustees, and its committees having any of the authority of the Board of Trustees; and shall keep at the registered or principal office a record giving the names and addresses of the members entitled to vote on matters before the Board of Trustees. All books of the organization may be inspected by any member of the Board of Trustees at any reasonable time, and by the member of the public in accordance with the Missouri Sunshine Law.

ARTICLE VIII

Committees

1. There shall be the following Standing Committees formed within the Board of Trustee membership:
 - (a) The Executive Committee shall be composed of the three Board officers, the Chairman, the Vice-Chairman, and the Secretary-Treasurer. The duties of the Executive Committee shall be to study, review and consider such matters as may be assigned to the Executive Committee by the Board of Trustees, including, but not limited to, litigation and potential litigation, contracts, and fiscal matters.
 - (b) The Nominating Committee shall be composed of three members appointed by the Chairman during the January Board of Trustees meeting. The Chairman shall be an ex-officio member of the Nominating Committee. The duties of the Committee shall be to nominate persons to serve as officers of the Board of Trustees and to solicit and screen nominees as potential Board Members.
 - (c) The Personnel Committee shall be composed of not less than three (3) members appointed by the Chairman. The duties of the Personnel Committee shall be to review, study and consider personnel matters and matters affecting the staffing of the St. Louis Mental Health Board.
2. All appointments to the Standing Committees by the President shall be confirmed by a majority of a quorum, as defined in these By-Laws, of members of the Board of Trustees.
3. The Executive Committee is hereby authorized to plan for upcoming Board meeting and to act upon such matters as may come before it in the place and stead of the Board of Trustees in urgent circumstances, and to conduct unanticipated essential business, including, but not limited to, potential litigation, states of emergency, crises of substantial impact, and urgent circumstance contracting, and when no regularly or special called meeting of the Board of Trustees is scheduled to respond to such urgent circumstance; provided, however, that the notice and agendas of all meetings of the Executive Committee shall, at all times, comply with the Missouri Sunshine Law; provided, however, further, that the essential nature of the business and action taken by the Executive Committee in the place and stead of the Board of Trustees shall be reported to the full Board of Trustees at its next regularly or special-called meeting and such action entered in the minutes.
4. A majority of the members in office, excluding vacancies, of any committee shall constitute a quorum.
5. The Chairman of the Board of Trustees may appoint members of the Board of Trustees to such committees of the Board as are necessary for the conduct of the Board's business, upon approval of a majority of a quorum of members.

ARTICLE IX

Financial Control; Fiscal Year

1. The Board of Trustees shall develop and approve an annual budget.
2. No Board of Trustee member shall receive any compensation for his or her membership on the Board.
3. No part of the revenues of the organization shall inure to the benefit of, nor be distributable to, its Board of Trustee members, officers, or staff, except that the organization shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes of the organization set forth in Article III of these By-Laws.
4. The fiscal year of this organization is fixed from July 1st through June 30th.
5. All funds of the corporation not otherwise employed shall be deposited from time to time to the credit of the corporation in such banks, trust companies or other depositories as the Board of Trustees may select in accordance with Article IX of these By-Laws.

ARTICLE X

Budget

1. The Board of Trustees shall cause to be prepared an annual budget. The annual budget shall present a complete financial plan for the ensuing budget year with respect to both the Community Mental Health Fund, and its tax revenues, and the Community Children's Services Fund, and its tax revenues. The budgets and accounts of the Board of Trustees shall not commingle the monies of the Community Mental Health Fund and the Community Children's Services Fund; provided however, that the budgets may provide for cost allocation for shared expenses. The annual budget shall include at least the following information:
 - a) A budget message describing the important features for the budget and major changes from the preceding year;
 - b) Estimated revenues to be received from all sources for the budget year, with a comparative statement of actual or estimated revenues for the next preceding year, itemized by year, fund, and source;
 - c) Proposed expenditures for each classification for the budget year, together with a comparative statement of actual or estimated expenditures for the next preceding year, itemized by year, fund, activity, and object;
 - d) A general budget summary.
2. In no event shall the total proposed expenditures from any fund exceed the estimated revenues to be received plus any unencumbered balance or less any deficit estimated for the beginning of the budget year; provided, that nothing herein shall be construed as requiring

the Board of Trustees to use any cash balance as current revenue or to **change from a cash basis of financing its expenditures.**

3. The Board of Trustees may revise, alter, increase or decrease the items contained in the proposed budget, subject to such limitations as may be provided by law; provided, however, that in no event shall the total authorized expenditures from any fund exceed the estimated revenues to be received plus any unencumbered balance or less any deficit estimated for the beginning of the budget year.
4. Except as otherwise provided by law, the Board of Trustees shall, before the beginning of the fiscal year, approve the budget and adopt such resolutions as may be required to authorize the budgeted expenditures and produce the revenues estimated in the budget.
5. After the Board of Trustees has approved the annual budget and adopted a resolution required to authorize the expenditures proposed in the budget, the Board of Trustees shall not increase the total amount authorized for expenditure from any fund, unless the Board adopts a resolution setting forth the facts and reasons making the increase necessary and adopts a resolution to authorize the expenditures.
6. The budget resolutions as may be required to authorize the expenditures proposed in the annual budget as finally approved, and any resolutions to increase the total amount authorized for expenditure adopted shall be reflected in the minutes of the meeting at which it was adopted and shall remain on file for three years and shall be public records and open to inspections.
7. If at the beginning of any fiscal year the Board of Trustees has not approved or adopted and filed the budget and the expenditure resolution herein for the current fiscal year, and except as otherwise provided by law, the several amounts authorized in the expenditure resolutions for the next preceding fiscal year for the objects and purposes specified therein, so far as the same shall related to operation and maintenance expenses, shall be deemed to be re-appropriated for the several objects and purposes specified in said expenditure resolutions until such time as the budget and the expenditure resolutions for the current fiscal year are approved and adopted and filed as required herein.

ARTICLE XI

Deposits; Depositories

1. The Board of Trustees may invest funds not immediately needed for the purposes to which such funds, or any of them, may be applicable; provided, however, that the requirements for separate deposit insurance of public funds permitted by federal deposit insurance are met and there is compliance with the following condictions.
 - a) At no time shall the monies for the Community Mental Health Fund and those of the Community Children's Services Fund be commingled; provided, however, that a combined operating fund may be utilized, so long as all funds are accounted for separately; and

- b) The public funds are invested through a financial institution which has been selected as a depository of the funds in accordance with any applicable provisions for the statutes of Missouri relating to the selection of depositories and such financial institution enters into a written agreement with the Board of Trustees.

ARTICLE XII

Fixing of the Ad Valorem Tax

The Board of Trustees shall fix the ad valorem property tax rates for both the Community Mental Health Fund and the Community Children's Services Fund as provided by Section 67.110, RSMo., but not later than the date set by the Assessor for the City of St. Louis for submittal of the tax rates for each fund into the tax records of the City of St. Louis.

1. Before the Board of Trustees fixes the Mental Health and Children's Services rates of taxation, the Board or its budget officer shall present the following information, separately for each tax rate to be levied: the assessed valuation by category of real, personal and other tangible property in the City of St. Louis as entered in the tax book for the fiscal year for which the tax is to be levied, as provided by subsection 3 of section 137.245, RSMO., the assessed valuation by category of real, personal and other tangible property in the City of St. Louis for the preceding taxable year, the amount of revenue required to be provided from the Property tax as set forth in the annual budget adopted as provided by these By-Laws, and the tax rate proposed to be set.
2. Should the Board of Trustees whose taxes are collected by the collector of revenue fail to fix its ad valorem property tax rate **the date set by the Assessor of the City of St. Louis for submittal of the tax rates**, then no tax rate other than the rate, if any, necessary to pay the interest and principal on any outstanding bonds shall be certified for that year.
3. The Board of Trustees shall hold at least one public hearing for the proposed rates of taxes at which citizens may be heard prior to their approval. The Board shall determine the time and place for such hearing. A notice stating the hour, date and place of the hearing shall be published in at least one newspaper qualified under the laws of the state of Missouri of general circulation in the county within which all or the largest portion at least seven days prior to the date of the hearing. The notice shall include the assessed valuation by category of real, personal and other tangible property in the City of St. Louis for the fiscal year for which the tax is to be levied as provided by subsection 3 of section 137.245, RSMo., the assessed valuation by category of real, personal and other tangible property in the City of St. Louis for the preceding tax year, for each rate to be levied the amount of revenue required to be provided from the property tax set forth in the annual budget adopted as provided by this chapter, and the tax rates proposed to be set for the various purposes of taxation.
4. The notices, publications and agendas for the public hearing shall clearly show that the rates of taxes being considered are the Community Mental Health Fund Tax and, separately, the Community Children's Services Fund Tax.
5. The tax rates shall be calculated to produce substantially the same revenues as required in the annual budget adopted as provided by the By-Laws. Following the hearing the Board of Trustees shall fix the rates of taxes and forward its certification of same to the City of St. Louis Assessor's Office for entry in the tax book.

ARTICLE XIII

Investment of Funds

The Board of Trustees shall adopt a policy on the investment of funds, which policy shall specify the general objectives, standards of care, safekeeping and custody, suitable investments, investment parameters, and reporting of its funds.

ARTICLE XIV

Department of Health, Annual Report

The Board of Trustees shall submit information as required by the Department of Health, State of Missouri, on the disbursement of monies from the Community Mental Health Fund no later than January 1st of each year, or at such date as the Department of Health may require.

ARTICLE XV

Ethics

The Board of Trustees shall approve and implement an Ethics policy which complies with the requirements of Chapter 150 of the Revised Statutes of Missouri.

ARTICLE XVI

Staff

1. The Board of Trustees shall hire an Executive Director, who shall be responsible for carrying out the responsibilities and business of the Board of Trustees in conformity with all policies of the Board, including but not limited to, the hiring, firing, demotion/promotion, discipline, and supervision of employees.
2. The staff of the Board of Trustees shall comply with the policy set forth by the Board of Trustees.
3. Staff position descriptions shall be developed and updated for all staff positions and shall be approved by the Board of Trustees.

ARTICLE XVII

Parliamentary Procedure

Roberts Rules of Order, the latest edition published and available to the general public shall apply to matters not covered by these By-Laws.

ARTICLE XVIII

Amendments

These By-Laws may be altered, amended or repealed and new By-Laws may be adopted upon the vote of approval of two-thirds of the members of the Board of Trustees; provided, however, that previous notice of such amendment and meeting has been given to all of the members of the Board of Trustees, in writing, at least fourteen days prior to the date of the meeting.

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Revised: March 14, 2013, August 19, 2021

2021 – 2023 STRATEGIC PLAN

Strategy 1. *Promote and implement equitable, high-impact services system and practices*

Strategies	Milestones
Invest in health equity and racial justice initiatives	Adopt an equity framework and best practice service models based on selected priorities
Develop and adopt a Roadmap to Change that guides MHB's investment and quantifies its community impact	Complete a Roadmap to Change to guide investments focused on critical needs
Support responsive systems that expand access and availability to behavioral health and children's services, especially to those most in need	Synchronize the children and adult allocation funds to allow for comprehensive approaches and reduce unnecessary barriers
Identify and address critical high priority service needs and gaps	Develop early childhood program allocation process for new CCSF Funds

Strategy 2. *Champion community knowledge and field building*

Strategies	Milestones
Provide leadership in guiding the broader community's investment in adult and children's behavioral health	Develop and implement a strategy for integrating community and family voice along with professional input
Identify and select initiatives and collaborations from which MHB will learn and/or participate and define the level of participation	Develop a list of community, state, and national initiatives and select those from which MHB should learn or participate in and MHB's role in each
Promote lessons learned, both internal and external to MHB, that highlight community voice, evidence-based, and promising practices (e.g., racial equity, intergenerational service delivery, trauma-informed practice, etc.)	Develop and implement a strategy for integrating community and family voice along with professional input

Strategy 3. *Maximize all resources for greatest impact*

Strategies	Milestones
Maximize financial capital—Increase and leverage diverse funding to expand behavioral health services and system building	Identify opportunities to access unused/underspent funds from all available sources
Maximize human capital—Make most effective use of trustee and staff expertise	Verify advisability of establishing an affiliated 501(c)3 entity and implement next steps based on recommendations Train and engage trustees and staff to advance Strategic Plan goals
Continue to maintain a high-quality fund allocation process, balancing our commitment to equity, impact, responsiveness, and flexibility	Develop fund allocation that supports key MHB equity and best practice priorities
Develop and maintain systems needed to track, measure, report, and assess our impact	Design and maintain data system that captures MHB's Theory of Change and reports on grantee data including outcomes and indicators for each program area

Strategy 4. *Tailor communications and messaging for meaningful engagement*

Strategies	Milestones
Develop an internal communications strategy	Establish framework and methods for shared decision-making including staff, trustees, and community representatives
Develop an external communications plan that advances the organization's strategic priorities—delivering the right message to the right people at the right time	Implement both external and internal communications plan
Deepen MHB's relational approach with funded partners and peer funders	Implement both external and internal communications plans
Cultivate and nurture communications among and across MHB's funded partners	Make improvements to grantee review and engagement processes based on assessments and grantee feedback

NEEDS ASSESSMENTS

2017 Youth Behavioral Health Community Needs Assessment Recommendations

- 1 Expand access to behavioral health programs and services
 - 2 Strengthen the service providing community, behavioral health and non- behavioral health
 - 3 Increase assessment and early intervention
 - 4 Invest in school-based capacity to address behavioral health needs
 - 5 Prioritize supports for vulnerable populations
 - 6 Respond to youth experiences of trauma
 - 7 Reduce barriers related to social determinants of health/environmental stressors
 - 8 Foster positive youth development
-

2018 Adult Behavioral Health Community Needs Assessment Recommendations

- 1 Expand service capacity to meet the needs of more people and develop innovative approaches to address behavioral health needs
 - 2 Improve access to existing behavioral health services by removing barriers and offering more navigational assistance
 - 3 Implement more recovery-oriented, evidence-based adult behavioral health services
 - 4 Build capacity of behavioral health service providers to interrupt or prevent crises at earlier stages and in more innovative and effective ways
 - 5 Prioritize services and support for high-need geographic areas and vulnerable populations
 - 6 Foster more successful recovery by addressing social determinants of health as part of treatment and intervention
-

BOARD AND STAFF INFORMATION

Board of Trustees Contact Information (As of November 2022)

Name	Employer	Neighborhood	Email	Phone	Term
Andrea Blaylock, LCSW, CEAP, SAP	Emerson	DeBaliviere Place	andiblaylockstl@gmail.com	773.771.1692	12/31/2025
Terrell Carter, DMin <i>Board Chair & Housing Committee Chair</i>	Rise Community Development	Lindenwood Place	terrellcarter@msn.com	314.704.9111	04/30/2024
Vander Corliss, MAcc	United Way of Greater St. Louis	Downtown	vander.corliss@stl.unitedway.org	314.610.4770	12/31/2022
Linda Grayson, <i>Personnel Committee Chair</i>	May Company (Retired)	Central West End	graysonlc@aol.com	314.550.2769	04/30/2024
Ronald Griffin, MHA, BSN, RN	Washington University School of Medicine	Penrose	rcgriffin1@hotmail.com	314.766.0387	04/30/2024
Mario Hamell, BA	Parallon	Gravois Park	mlhfg8@yahoo.com	314.458.8203	04/30/2024
Carolyn Jackson, MA <i>Nominating Committee Chair</i>	St. Louis Community College	Enright	emmonstravel@yahoo.com	314.210.9240	12/31/2024
Julia López, PhD, MPH, LCSW <i>Program Committee Chair</i>	Washington University School of Medicine	Forest Park Southeast	julialopez@wustl.edu	314.704.6770	12/31/2024
Samantha March, EdD	St. Louis Public Schools	Wells Goodfellow	Samantha.March@slps.org	314.536.3909	12/31/2022
Lisa Mulligan, MSW	Girls on the Run St. Louis	Shaw	lisa@gotrsl.org	314.922.6587	12/31/2024
Cassandra Pinkston, MPA	Higher Education Consortium of St. Louis	Shaw	cpinkston@hecstl.org	314.397.5687 (Home)	12/31/2022
Robert Poirier, MD, MBA <i>Secretary/Treasurer & Finance—Investment Committee Chair</i>	Washington University School of Medicine	Central West End	poirierr@wustl.edu	314.761.7252	12/31/2022
Donna Schmitt, JD <i>Vice Chair</i>	Armstrong Teasdale, LLP	St. Louis Hills	dschmitt@atllp.com	314.202.1643	12/31/2024

Board of Trustees Biographical Summaries



*Terrell Carter, DMin – Board Chair
Lindenwood Park Neighborhood*

First appointed as an MHB Trustee in December 2010, Dr. Carter currently serves on the Executive Committee as the Board Chair and as the Chair of the Housing Committee. An artist and writer, Terrell currently serves as Executive Director for Rise Community Development. Previously he was Vice President and Chief Diversity Officer at Greenville University. Prior he served as Director for Contextualized Learning and Assistant Professor of Practical Theology for Central Baptist Theological Seminary and held Executive Director positions with North Newstead Association and CREATE, Inc. both of which focused programs on housing development projects within the city. Terrell also served with the St. Louis Metropolitan Police Department as a Police and Public Affairs Officer.



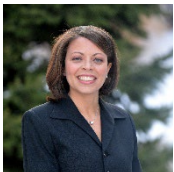
*Donna Schmitt, JD – Vice Chair
St. Louis Hills Neighborhood*

Donna was first appointed an MHB Trustee in June 2016 and serves on the Executive and Finance - Investment Committees. She is a Partner with Armstrong Teasdale, LLC. As a member of the Intellectual Property practice group and leader of the Trademark Services practice area, Donna strategically manages global trademark portfolios. Prior to joining Armstrong Teasdale, Donna served as Senior Trademark Counselor for Energizer.



*Rob Poirier, MD, MBA – Secretary/Treasurer
Finance—Investment Committee Chair
Central West End Neighborhood*

Dr. Poirier serves as both the Clinical Chief of Emergency Medicine and Assistant Professor of Emergency Medicine at the Washington University School of Medicine winning the Distinguished Community Service Award from that institution in 2014 for his commitment to initiatives aimed at improving the health and well-being of the citizens of the greater St. Louis community. He currently volunteers on the Boards of Behavioral Health Network and Bridges to Recovery and Care and was appointed to serve as an MHB Trustee in November 2017 where he additionally serves on the Program, Nominating, and Executive Committees.



*Andi Blaylock, MSW, LCSW
DeBelievere Place Neighborhood*

(Andrea) Andi Blaylock, LCSW, CEAP, SAP is the global Director of Wellbeing at Emerson, leading the company's strategy to ensure the physical, mental, financial and social aspects of employees' lives are supported both in and out of work. Andi has been in the workplace mental health and Human Resources field for nearly 20 years, following a career in child welfare and adoption. Andi is a Licensed Clinical Social Worker, Certified Employee Assistance Professional and Substance Abuse Professional, with a Master's Degree in Social Work from the

University of Michigan in Ann Arbor. She regularly volunteers with local civic and non-profit organizations.



*Vander Corliss, MAcc
Downtown Neighborhood*

Vander, a city resident since 1999, has been an MHB Trustee since May 2022 and serves on the Finance – Investment Committee. He is the Chief Financial Officer of the United Way of Greater St. Louis and is responsible to the CEO for the overall financial health of the \$80M+ not-for-profit with a \$14M operating budget, oversees technology, and is the staff person responsible for its Finance, Investment, and Audit Committees. His St. Louis related volunteer passions include Crossroads College Prep and Trinity Episcopal Church.



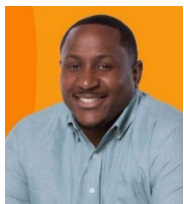
*Linda Grayson – Chair, Personnel Committee
Central West End Neighborhood*

First appointed as an MHB Trustee in December of 2010, Linda is the immediate past Chair of the Board, currently serving as Chair of the Personnel Committee. Now retired, Linda served in many capacities spanning four decades with the May Department Stores Company last serving as Senior Vice President, Product Development. In addition to the MHB, Linda has been a Board member with the Spirit of St. Louis Women's Fund.



*Ronald Griffin, MHA, BSN, RN
Penrose Neighborhood*

First appointed as a Trustee in November 2022, Ronald is a St. Louis native, executive, and community leader, dedicated to championing health equity in the St. Louis region. A results-oriented leader, Ronald's charisma, passion, and empathy allows him to establish rapport and build strategic relationships with diverse constituencies at all levels of public, private, non-profit, and communities alike. In addition, he is a registered nurse who believes that healthcare access is an inalienable right of all people. In his current role as Director of Clinical Operations at Washington University School of Medicine, Ronald is responsible for leading, developing, and driving the comprehensive mission, vision, and values while improving access and patient experience within the region. In addition, Ronald is known for being a doting husband and father to his wife, Stephanie Griffin, and daughter, Zoe Griffin.



*Mario Hamell, BA
Gravois Park Neighborhood*

Mario became an MHB Trustee in November 2022. As Director of Operations in Parallon's Customer Service Division he directs and coordinates all revenue cycle activities within his assigned specialty center, ensuring client satisfaction on service and performance. Mario is currently an active member of a fraternity in St. Louis where he helps to mentor youth and provides oversight over several committees.



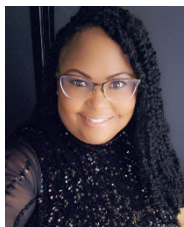
*Carolyn Jackson, MA – Chair, Nominating Committee
Enright Neighborhood*

Carolyn has been an MHB Trustee since November of 2012. In addition to being a previous Board Chair, she is Chair of the Nominating Committee. Carolyn managed the Upward Bound/TRiO program through St. Louis Community College/Forest Park since 1999 until her recent retirement. She is now a permanent building substitute teacher with the Confluence South City Academy. Additionally, Carolyn has vast grant writing experience and since 2009 has worked as a peer reviewer for the Corporation for National and Community Service.



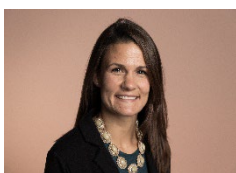
*Julia D. López, PhD, MPH, LCSW – Chair, Program Committee
Forest Park Southeast Neighborhood*

Julia became a MHB Trustee in January 2020, serves on the Nominating Committee and Chairs the Program Committee. She is currently Instructor of Medicine—Division of Infectious Diseases at Washington University. She is a public health researcher who uses her clinical practice skills to further advance the field of sexual health using public health theories and frameworks. To date, she has worked to integrate her clinical expertise as a licensed social worker in community mental health settings and substance use treatment with the research design and methodology for analyzing, interpreting, and disseminating data across a myriad of settings and populations. By building on this foundation, Dr. López focuses on addressing gaps in research and clinical practices in the areas of HIV care, sexual and gender minority health, and its relationship to risk factors associated with mental and physical health outcomes.



*Samantha March, EdD
Wells Goodfellow Neighborhood*

Dr. Samantha March became an MHB Trustee in September 2021 and was born and raised in the City of St Louis. She has an undergraduate degree and certification in Early Childhood Education from the University of Missouri- Saint Louis and a masters and a doctorate degree in Educational Leadership from Maryville University. She has thoroughly enjoyed working in urban education for over 15 years and currently is the Director of Early Childhood Education for the Saint Louis Public School District. As an active member of a number of boards and advisory groups, she believes serving the community is a priority.



*Lisa Mulligan, MSW
Shaw Neighborhood*

Lisa joined MHB in November 2022. She is a social worker who has dedicated her career to the mental and physical well-being of young people in the St. Louis community with a primary focus on prevention programming. In her current role as the Director of Program & Development at Girls on the Run St. Louis, Lisa leads all aspects of the programmatic and philanthropic strategy for the organization which has been nationally recognized as one of the nation's most impactful and influential youth programs. She believes in the strength and possibility of young people and their caregivers and is committed to improving access to mental and physical health care for all St. Louis residents, primarily the most vulnerable. Lisa is passionate about the City of St. Louis and is raising her family in the Shaw neighborhood.



*Cassandra Pinkston, MPA
Shaw Neighborhood*

Cassandra joined MHB in January of 2020. Cassandra Pinkston oversees the administration, programs, fiscal management, and ultimately the fulfillment of the strategic plan in her role as CEO for the Higher Education Consortium. Their mission is to advance the communication and cooperative activities among member institutions, secondary schools, related community organizations and individuals; to provide member colleges and universities the opportunity to meet and discuss topics of interest; and to collaborate on projects designed to enhance student's accessibility to as well as their achievement in higher education.

TRUSTEE RESPONSIBILITIES

Board Composition

The identification of Board candidates follows the organization's by-laws which require a minimum of nine (9) members to a maximum of 15. At least half cannot be providers of health services, one must be a physician, no more than one third can represent public or private entities involved in the provision of services. At least one third of the Board should represent consumers of mental health and/or substance use services or their families receiving such services. The by-laws also stipulate that the overall composition of the Board of Trustees shall reflect the residents of the City of St. Louis with respect to employment, race, age, sex, geography, and other demographic characteristics. Trustees may not be compensated for their membership on the Board.

Appointment Process

Prospective Trustees are nominated by MHB's Nominating Committee, apply through the city's website on the Boards & Commissions page, or are nominated by the Mayor of the City of St. Louis. Regardless of the nomination source, the Mayor appoints all MHB Trustees whose appointments must then be approved by a vote of the city's Board of Aldermen.

Length of Term and Board Meetings

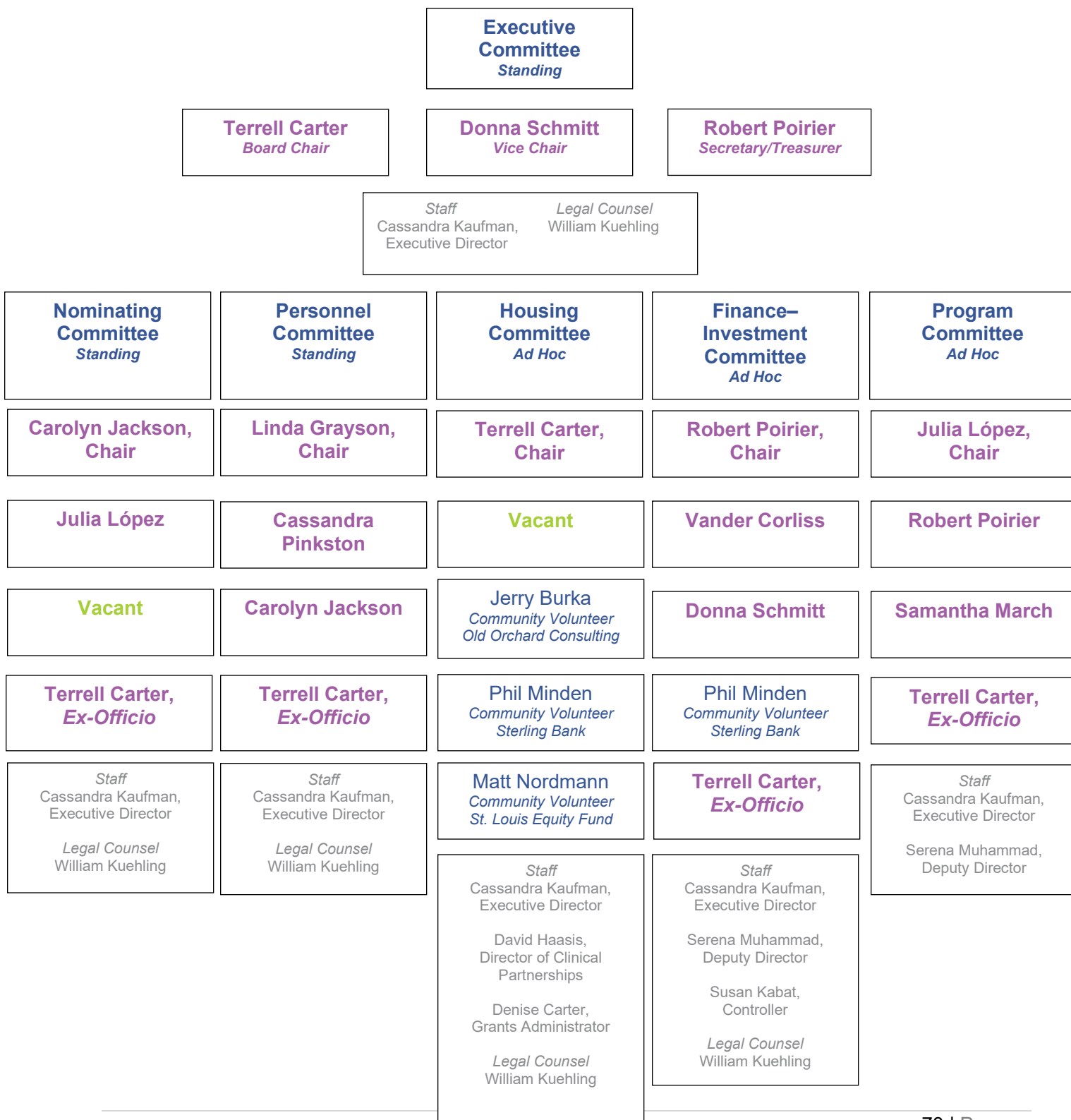
MHB Trustees are appointed to serve a three-year term which may be renewed. A new Trustee may be appointed to complete an existing term for a Trustee who has resigned or is unable to complete their term. Board meetings are held on the third Thursday of each month, except in July and December, usually at MHB's office located at The Annex at Union Station, beginning at 5:45 PM. During the COVID-19 pandemic, Board meetings have been conducted virtually since March 2020. The Board may resume meeting in person at any time.

Board of Trustees' Responsibilities

The Board of Trustees is responsible for governance, strategy, and policy making for MHB and for overseeing its operations. The Board has fiduciary responsibility for MHB's \$20+ million in assets. In addition to attending monthly Board meetings, Trustees are expected to serve on at least one committee which meets virtually or in-person. Currently, the Board has six (6) committees: Executive, Nominating, Personnel, Finance and Investment, Housing, and Program.

BOARD COMMITTEES

Board Committee Structure and Membership (As of September 1, 2022)



Duties and Responsibilities of Board Officers (Approved August 2022)



SAINT LOUIS MHB DUTIES AND RESPONSIBILITIES OF THE OFFICERS OF THE BOARD OF TRUSTEES

The officers of the City of Saint Louis Mental Health Board of Trustees ("Board") shall be a Chair, Vice-Chair, and Secretary/Treasurer.

- The term of these offices is one (1) year
- In the event an officer cannot fulfill their entire term, the Board shall elect a successor to fill the remainder of the term

Each March, the Nominating Committee shall present a slate of candidates for each office. At the April Board meeting, the officers elected in March shall be installed.

The officers shall perform the following duties and responsibilities, including, but not limited to:

- **Chair**
 - Preside at all meetings of the Board
 - Sign any contracts or other instruments the Board has authorized to be executed
 - Shall perform personally or through a designee all duties incident to the office of Chair and such other duties as may be prescribed by the Board from time to time
 - Serve as an authorized check signer for the Board
 - Approve any payments greater than \$10,000.00, including the monthly ACH payment to funded partners
- **Vice Chair**
 - In the absence of the Chair or in the event of the Chair's inability or refusal to act, the Vice Chair shall perform all the duties of the Chair and when so acting, shall have all the powers of and be subject to all the restrictions upon the Chair
 - Serve as an authorized check signer for the Board
 - In the absence of the Chair, the Vice Chair may approve any payments greater than \$10,000.00, including the monthly ACH payment to funded partners
- **Secretary/Treasurer**
 - Have charge and custody of and be responsible for all funds and securities of the organization
 - Ensure such banks, trust companies or other depositories shall be selected in accordance with the provisions of Article XI of MHB's By-Laws
 - Keep the minutes of the Board meetings in one or more books provided for that purpose
 - See that all notices are duly given in accordance with the provisions of the By-Laws as required by law
 - Secretary/Treasurer or designee shall post the notice and agendas of all regular and special-called meetings prior to the meeting in accordance with the requirements of the Missouri Sunshine Law (Chapter 610, RSMo.)

- Shall perform personally or through a designee, all the duties incident to the office of Secretary/Treasurer and such other duties as from time to time may be assigned by the Chair or by the Board
- Serve as an authorized check signer for the Board
- In the absence of the Vice Chair, the Secretary/Treasurer may approve any payments greater than \$10,000.00, including the monthly ACH payment to funded partners

Any officer elected or appointed to the Board may be removed upon a two-thirds vote of the Board as an officer – not as a Trustee by the Board whenever in the judgement of the Board, the best interests of the organization would be served. A vacancy in any office due to absence, illness, death, resignation, removal, disqualification, or otherwise of the officer, may be filled by the Board for the unexpired portion of the term.

Board Committee Charters (Approved August 2022)

Executive Committee (Standing)



SAINT LOUIS MHB EXECUTIVE COMMITTEE CHARTER

PURPOSE:

Article VIII of the City of Saint Louis Mental Health Board of Trustees' (Saint Louis MHB) By-laws establishes a standing Executive Committee which shall be comprised of the three elected Board Officers (Chair, Vice Chair, and Secretary/Treasurer). The duties of the Executive Committee as assigned by the Board of Trustees include but are not limited to studying, reviewing, considering, and acting on litigation, potential litigation, contracts, and fiscal matters. The MHB Executive Committee has the authority to act on behalf of the Board when necessary.

ROLES AND RESPONSIBILITIES:

The Executive Committee shall meet at the call of the MHB Board of Trustees, the Board Chair or Officer, or MHB Leadership Staff to review, develop, assess, and provide advice and insight as requested regarding the following:

- Litigation or potential litigation
- Urgent circumstance contracting
- Unplanned fiscal matters
- Business needing immediate action

COMMITTEE COMPOSITION:

The membership of the Executive Committee is limited to the duly elected MHB Officer Slate which is voted on annually by the full Board of Trustees at their March meeting.

STAFF TO THE COMMITTEE:

Executive Director, MHB Legal Counsel

Nominating Committee (Standing)



SAINT LOUIS MHB NOMINATING COMMITTEE CHARTER

PURPOSE:

Article VIII of the City of Saint Louis Mental Health Board of Trustees' (Saint Louis MHB) By-laws establishes a standing Nominating Committee which shall be comprised of three MHB Trustees. The Board Chair shall be an ex-officio member of the Nominating Committee. The duties of the Nominating Committee include reviewing, studying, and ultimately nominating persons to serve as Officers of the Board of Trustees and to solicit and screen nominees as potential Trustees to serve the Saint Louis MHB.

ROLES AND RESPONSIBILITIES:

The Nominating Committee shall meet at the call of the Board Chair or Officer, or the Executive Director to review, develop, assess, and provide advice and insight as requested regarding the following:

- **Annual Officer Slate:** Each February, the Nominating Committee shall convene to determine the MHB Officer Slate for the upcoming year. The annual term of Officers is from the April meeting until the next April meeting. The nominated slate is voted on at the March Trustee meeting.
- **Board Composition:** Per its by-laws, the Saint Louis MHB Board of Trustees must have a minimum of nine (9) members to a maximum of 15. At least half cannot be providers of health services, one must be a physician, no more than a third can represent public or private entities involved in the provision of services as detailed in Section 205.975, RSMo., 2004. Additionally, at least a third shall represent consumers of psychiatric services or the families receiving such services. Finally, the by-laws stipulate the overall Trustee composition shall reflect the residents of the City of St. Louis with respect to employment, race, age, sex, and geography.
- **Board Vacancies:** The Nominating Committee shall meet to plan, review and commit to nominations to fill vacancies that adhere to the composition requirements stated above.

COMMITTEE COMPOSITION:

The membership of the Nominating Committee shall include a minimum of three Trustees appointed annually by the Board Chair each January.

STAFF TO THE COMMITTEE:

Executive Director, MHB Legal Counsel

Personnel Committee (Standing)



SAINT LOUIS MHB PERSONNEL COMMITTEE CHARTER

PURPOSE:

Article VIII of the City of Saint Louis Mental Health Board of Trustees' (Saint Louis MHB) By-laws establishes a standing Personnel Committee which shall be comprised of not less than three MHB Trustees appointed by the Board Chair. Per the by-laws, the duties of the Personnel Committee include reviewing, studying, and considering personnel matters and matters affecting the staffing of the Saint Louis MHB.

ROLES AND RESPONSIBILITIES:

The Personnel Committee shall meet at least twice annually at the call of the Board Chair, a Board Officer, or the MHB Executive Director to review, develop, assess, and provide advice and insight as requested, regarding the following:

- **Review personnel policies**—bi-annually review and ensure that personnel policies comply with applicable laws, regulations, ethical guidelines, and minimize organizational risk and exposure; ensure the policies are also reviewed bi-annually by legal counsel.
- **Evaluate performance of the Executive Director**—coordinate an annual formal written performance assessment of the Executive Director and present the findings to the full Board. Based on the performance assessment, the Committee will determine when performance-based salary increases are merited and present their recommendations to the Board. Additionally, the Committee may recommend changes in compensation and benefits for the Executive Director.
- **Organizational staffing needs**—conduct periodic review of staffing structure and organizational needs as needed.
- **Job descriptions**—review and approve all job descriptions, including periodic revisions.
- **Compensation review**—bi-annually review the compensation plan (salary ranges and fringe benefits) developed by the Executive Director ensuring that the plan aligns with organizational values, as well as verifying that the plan is realistic relative to the organization's overall budget and resources; ensure that MHB salaries are comparable to and competitive with those paid for similar jobs in the external market; present recommendations for changes to the Finance—Investment Committee for review prior to presentation to the full Board for approval.
- **Sensitive personnel matters**—the Committee will follow the process outlined in the Employee Handbook to address and resolve grievances brought to its attention.
- **Review reports of alleged harassment and/or sexual harassment**—the Committee shall serve as the body with the authority to review and address allegations of harassment and/or sexual harassment made by MHB employees, following the process outlined in the Employee Handbook.

- **Review employee suggestions and/or complaints following unsatisfactory response from the Executive Director**—in the event an employee is unsatisfied with the resolution of a suggestion and/or complaint presented to the Executive Director, the employee may submit the suggestion and/or complaint to the Personnel Committee for further review and consideration per the process outlined in the Employee Handbook.
- **Perform such other functions as the Board shall designate from time to time**

COMMITTEE COMPOSITION:

The membership of the Personnel Committee shall include at least three Trustees, appointed by the Board Chair. Committee members shall be appointed for staggered one-year terms and may be re-appointed for three consecutive one-year terms. The Board Chair shall serve in an ex-officio capacity. As per the Saint Louis MHB By-laws, additional or replacement members must be voted in by a majority of Trustees.

STAFF TO THE COMMITTEE:

Executive Director, MHB Legal Counsel

Housing Committee (Ad Hoc)



SAINT LOUIS MHB HOUSING COMMITTEE CHARTER

PURPOSE:

The City of Saint Louis Mental Health Board of Trustees' (Saint Louis MHB) Housing Committee is an ad-hoc committee formed to oversee the administration of the Board's Permanent Supportive Housing (PSH) Fund established from the Community Mental Health Fund. The PSH Fund is made available primarily through forgivable loans for rehab or new build of PSH units for persons with serious behavioral health conditions in need of permanent housing and supportive services to stabilize their behavioral health conditions.

ROLES AND RESPONSIBILITIES:

The Housing Committee meets on an 'as-needed' basis to review submitted letters of intent and to determine whether these initial proposals should move on to a full application. They will reconvene after an application is received to review, discuss, and vote on whether to bring the project to a full Trustee vote at an upcoming Board meeting. They may also meet to discuss issues surrounding any previously funded projects to ensure each is fulfilling its obligations with respect to signed covenants.

COMMITTEE COMPOSITION:

The current configuration of the MHB Housing Committee includes three (3) Trustees and three (3) community volunteers with specific expertise.

STAFF TO THE COMMITTEE:

Executive Director, Director of Operations, and MHB Legal Counsel

Finance—Investment Committee (Ad Hoc)



SAINT LOUIS MHB FINANCE—INVESTMENT COMMITTEE CHARTER

PURPOSE:

The City of Saint Louis Mental Health Board of Trustees' (Saint Louis MHB) Finance Committee is an ad-hoc committee formed to oversee the financial well-being of MHB, ensuring good stewardship of public funds and investments made to the community.

ROLES AND RESPONSIBILITIES:

- Review quarterly financials.
- Discuss and approve any cost-of-living adjustments (COLA) for the next Fiscal Year Grant Allocations and staff.
- Mid-year review of Net Position in anticipation of budget season.
- Review the calendar year Investment Management report.
- Discuss and approve parameters of upcoming FY Budget.
- Review and approve the next Fiscal Year Budget to be placed before full Board at their June meeting.
- Review and approve the Unaudited Year-End Financials.
- Review and approve any changes to MHB's Accounting Policies and Practices prior to the audit each fiscal year.
- Discuss and approve parameters of upcoming Audit.
- Review and approve the Audit to be placed before the full Board at their November meeting.

COMMITTEE COMPOSITION:

The current configuration of the MHB Finance—Investment Committee includes three (3) Trustees, one of which is the Secretary/Treasurer.

STAFF TO THE COMMITTEE:

Executive Director, Deputy Director, Director of Operations, Controller, and Legal Counsel

Program Committee (Ad Hoc)



SAINT LOUIS MHB PROGRAM COMMITTEE CHARTER

PURPOSE:

The City of St. Louis Mental Health Board of Trustees' (Saint Louis MHB) Program Committee is an ad hoc committee formed to provide guidance, advisement, and oversight to support the successful implementation and continuous quality improvement of MHB's community investment strategy and approach.

ROLES AND RESPONSIBILITIES:

Based upon MHB's mission and purpose, and in particular the programmatic work relevant to MHB's Board of Trustees, the Committee shall:

- Maintain ongoing strategic dialogue with and between MHB staff and the full Board of Trustees, including over the course of a year a review of:
 - Any new initiatives or explorations
 - Any unsolicited requests for funding and/or those funding requests received outside of MHB's established grant cycles or application processes
 - Any substantive shift in strategy for community investment and/or grant making
 - The performance of MHB's community investments, including the Community Mental Health Fund, Community Children's Services Fund, federal grants, and any other local, state, or national foundation grant made to community organizations
 - The progress and evaluation of funding partnerships and initiatives over time, including investment management partnerships
- Support a periodic review of MHB's structure and process for grant making and the investment of tax revenues for the purposes of fulfilling MHB's mission and purpose
- Serve as a sounding board for MHB staff and provide specific advice and/or guidance as requested

COMMITTEE COMPOSITION:

The membership of the Committee will be comprised of at least three and no more than five members, three of which shall be MHB Trustees recommended by the Nominating Committee. Committee membership may also be expanded to include other community members with specific subject matter expertise and experience as desired by MHB staff and Trustees. A Chair will be appointed by the Board Chair for two, one-year renewable terms.

STAFF TO THE COMMITTEE:

Executive Director and Deputy Director

COMMUNITY INVESTMENTS

Community Investment Policies

Introduction

This manual establishes the City of Saint Louis Mental Health Board of Trustees (“Saint Louis MHB” or “MHB”) rules and principles for distributing the financial resources with which it is entrusted. The Community Investment Policies have evolved over the Board’s history of administering tax revenues and reflect lessons learned. These policies have been restated to be in keeping with the mission, vision and values the Board reaffirmed in April 2016, and to be consistent with existing statutes and regulations.

MHB was established in 1994. The Mayor appoints the Trustees with the advice and consent of the Board of Aldermen. The statutory authority for the formation, operation and scope of the Saint Louis MHB can be found in Sections 205.975 – 205.990, 67.1775, and 210.860 – 210.861 R.S.Mo.

In November 1992, St. Louis voters passed a tax referendum to create, maintain, and enhance services for City residents with mental health and/or substance use problems. MHB is entrusted to administer the public revenues generated by this tax. The statutory authority for the mental health tax levy can be found in Sections 205.977 – 205.980 R.S.Mo.

In November 2004, St. Louis voters passed a second tax referendum to create, maintain, and enhance services to protect the well-being and safety of the city’s children and youth and to strengthen the city’s families. MHB is also entrusted to administer the public revenues this tax generates. The statutory authority for the children’s tax levy can be found in Sections 210.860 R.S.Mo.

MHB pursues grants for mental health, substance use, children and family services from other sources such as federal or state governments or private foundations. From time to time, MHB also partners with other sources to jointly invest in outcomes. MHB does not provide direct services; thus, all direct service investments flow into community agencies/organizations.

The main section of this document includes the policies adopted by the Trustees which apply to investments made by MHB.

Cassandra Kaufman

Executive Director

Policies Which Apply to All Investments Made by MHB

Reservation of Rights

The policies and implementation stated herein are intended to guide MHB action. However, within the scope of its statutory authority, MHB reserves the right to unconditionally amend, modify, waive or cancel, in whole or in part, any policy or procedure, or the application thereof to any situation, if MHB deems it to be in its best interest to do so. MHB may exercise this right without notice or specific reference to these policies, and without any liability to any party.

MHB will be held harmless in regard to the provision of any services by a recipient of funds.

Statutory Obligations

Saint Louis MHB will endeavor to comply with all statutory obligations to which it is subject. Several such obligations may be of particular interest to potential applicants for investment.

1. MHB will comply with the [Missouri Public Records Law of 1961](#). Applicants for funding should be aware that all documents and correspondence submitted to MHB become part of the open public record.
2. MHB will comply with all aspects of the [Missouri Sunshine Law](#) regarding open meetings and records. Applicants for investments should be aware that our selection process occurs in a forum which is open to the public. The Sunshine Law also further prescribes that MHB's records are open to the public.
3. MHB will comply with the [Conflict of Interest](#) rules of the Missouri Ethics Commission. Applicants for investment should be aware that no MHB Trustee will participate in the review, discussion or selection for any applicant with whom there might be either an actual conflict or an appearance of a conflict of interest.
4. MHB will comply with the [Health Insurance Portability and Accountability Act of 1996 \(HIPAA\)](#) by neither accepting nor maintaining any document bearing the name or identifying information of any consumer receiving services. Applicants for investments must also comply with HIPAA and must include authorizing releases of information in files which allow MHB to regularly inspect records.

Eligibility for Investment

MHB will consider applications for investment only if all pertinent eligibility requirements regarding the applicant's organization, services, and consumers are met.

1. MHB will invest only in organizations that demonstrate fiscal, administrative and managerial stability, prudence, and diligence.
 - a. Recipients of funds must submit both an [independent audit and management letter](#), if issued, each year. The audit must be conducted by a Certified Public Accountant. The audit must include or be accompanied by a Single Audit (if applicable). Recipients must address immediately any deficiencies noted by the auditor to the

satisfaction of MHB. Audits are to be submitted within 180 days of the end of each organization's fiscal year.

- b. MHB reserves the right to approve any change to *key personnel* assigned to a project receiving investment.
- c. MHB requires all applicants to maintain *minimum levels of insurance* as periodically recommended by our legal counsel.

Current insurance requirements are:

Comprehensive General Liability insurance of at least \$1,000,000 general aggregate and \$1,000,000 each occurrence;

Workers' Compensation insurance with the minimum coverage required by Missouri law;

Professional Liability and Malpractice insurance (for any licensed professional employed in an MHB-funded program) of \$1,000,000 aggregate and \$1,000,000 each occurrence; and

Commercial Vehicle liability insurance (for any vehicles purchased through an MHB grant) of \$1,000,000.

- d. MHB shall have a preference for investing in organizations and/or projects with *diversified sources of revenue* (i.e., funding from at least one other source).
 - e. MHB will make investments only to not-for-profit organizations *in good standing with the Secretary of State* to do business in Missouri or organizations established by charter or statute.
 - f. MHB may require *new or smaller organizations* to partner with more established organizations for administrative support.
2. MHB will invest only in organizations that comply with all *local, state and federal regulations* related to fair labor practice, workplace safety, accessibility and consumer protection. Applicants should be aware that MHB assesses compliance with these laws each year and that this assessment includes an assessment of compliance with Executive Order 11246 regarding Affirmative Action.
 3. MHB shall only make investments in organizations and/or projects which demonstrate that individuals receiving mental healthcare services shall have a documented *mental health diagnosis* determined by a qualified mental healthcare provider except for prevention or early intervention of mental illness and/or substance abuse, outreach and engagement, crisis intervention, or other services where such a diagnosis would be a clear barrier to service.
 4. MHB shall only invest in applicants that demonstrate their ability to provide *culturally and linguistically appropriate services*.
 5. MHB funds shall not be used to provide any direct or indirect support of any religious education, service, or otherwise assist the religious mission of the church. Funds are provided solely to assist youth and adults in a content neutral manner.

6. MHB shall have a preference for investing in organizations and/or projects whose *governing board members* reside in the City or County of St. Louis.
7. MHB shall have a preference for investing in organizations and/or projects whose *services are provided in the City of St. Louis*.
8. MHB shall only make investments in organizations and/or projects which demonstrate that MHB funds will not be used to *supplant* other sources of revenue.
9. MHB shall only make investments in organizations and/or projects which meet all *additional specific eligibility requirements* established by a specific source of revenues.
10. MHB shall only make investments in organizations and/or projects which meet all *additional specific eligibility requirements* established in the “Givens” section of pertinent MHB Notices of Funding Availability (NOFA).

Public Accountability

MHB strives to achieve a high level of accountability to the public on whom it relies for support.

1. MHB shall endeavor to focus its resources in a deliberate, professional manner based on *professional needs assessments and strategic planning*. To that end, MHB may conduct periodic, systematic and comprehensive assessments and/or periodic specialty assessments of mental health and substance use service needs for residents of the City of St. Louis. Primarily, MHB shall conduct periodic strategic planning sessions to set the outcomes and identify the results the Board shall commit to achieving for City residents.
2. MHB shall endeavor to inform the public regarding mental health issues relevant to the residents of the City of St. Louis. Recipients of investments shall be required to participate in these efforts. MHB shall periodically issue a *Communications Standards* manual with which all recipients of investments shall be expected to comply.
3. MHB shall endeavor to inform the public regarding its activities, investments, and achievements. MHB shall publish an *Annual Report* which includes a list of funded partners, an outline of investment priorities, as well as a review and analysis of results and impacts realized.

Disbursements

MHB normally disburses investments in twelve equal monthly payments. As required by other funding sources, at the request of an applicant organization or on an *ad hoc* basis, MHB also disburses funds on an expense-reimbursement or on a fee-for-service basis.

1. MHB will disburse funds only after a *formal contract is duly executed*.
2. MHB will disburse funds only to recipients of investments who are in *full program and fiscal compliance* with the terms of their contracts. MHB reserves the right to withhold payment for all contracts in cases of fiscal non-compliance. Recipients of investments should be aware that MHB will delay payment of any funds for which the recipient has delayed submission of

required supporting documents and/or reporting. Recipients should also be aware that the final payment on any project may be delayed by thirty (30) to sixty (60) days pending receipt of final reports.

3. MHB requires *two authorized signatures* on all investment payment checks up to \$15,000.00.

Oversight

1. All recipients of investments must submit *timely, periodic status reports*.
2. All recipients of investments are subject to *annual site visits* by MHB staff to assure fidelity to the application for investment, efficacy and fiscal accountability.
3. Any *capital assets or equipment* with a unit cost of \$3,000.00 or more that is purchased with funds from MHB must be retained and used continually for the purposes originally intended for a period of three years from the date of purchase. MHB may inspect or repossess any such asset during that five-year window.
4. Any recipient of investments found to be out of compliance with their contract or MHB's policies shall be required to take *corrective action* to remedy the deficiency. Should a recipient fail to come into compliance, MHB will take further action up to and including terminating the investment.

Contracting

Each project invested in by MHB shall be governed by a duly executed contract which provides a detailed description of the relationship with MHB and MHB's specific expectations and requirements regarding the project.

1. MHB will award contracts for investments for a *maximum period of one year*.
2. Most investments made by MHB are intended to be multi-year projects. MHB will provide *annual renewals* for the length of the investment contingent upon the availability of funds and the applicant's re-application and good standing with MHB.
3. Contracts shall only be considered duly executed when they are signed by MHB's Executive Director, Attorney and an officer of MHB's Board AND by the recipient organization's *authorized signatories* (e.g., Executive Director and/or Board Officer).

Communication with Funded Partners

All *contract-related written communication* between MHB and funded partners shall be kept on file by MHB as part of the public record. Electronic mail and faxes are subject to and will be maintained in accordance with Missouri Sunshine Law. Contract-related correspondence and documents mailed by MHB shall be sent by certified mail, return receipt requested (or by a similar delivery service with delivery confirmation). Examples of contract related correspondence include contracts, amendments, required reports, site visit reports, corrective action plans, correspondence regarding progress on corrective action plans, correspondence regarding problems with reporting, etc.

Specific Policies for Investment From Community Mental Health Fund Tax Revenues

City Residents

Any investment made by MHB which includes local Community Mental Health Fund tax revenues is restricted to services which are provided to City residents. In programs which do not exclusively serve City residents, MHB funds shall not fund a proportion of the total program budget in excess of the proportion of services to City residents.

Maximum Investment

No single program or project investment from local Community Mental Health Fund tax revenues shall exceed \$750,000 in any fiscal year. If a proposed project is new to an organization, the total requested from MHB cannot exceed \$100,000 in the first year.

Designation by the Missouri Department of Mental Health

MHB shall make investments from local mental health tax revenues only in support of services which are designated eligible by the Missouri Department of Mental Health that contribute to MHBs investment outcomes.

Three-Year Cycle

MHB's primary use of local tax revenues shall be investments made in a three-year cycle. The first year of this cycle shall be an open competition for investments based on the needs identified by MHB in its needs assessments and the goals prioritized by the Board. The two following years shall be open only to re-applications from those projects which are achieving their specific contracted outcome and/or which use program learning to demonstrate improved performance to a degree which assures MHB there is a reasonable likelihood of future success. When organizations are not meeting their contracted outcome, MHB may reallocate funds to other providers within the same goal area or to another goal area altogether.

Special Investments

MHB may, from time to time, set aside funds from ongoing mental health or children's services tax revenues for *special projects or purposes other than Three Year Investments*. The eligibility requirements for investing in these special projects may differ from those imposed on those seeking funding through competitive grants. MHB also may establish from time-to-time special reserves which may be used for such purposes. A detailed description of each reserve and the specific purposes for which it may be used is available in MHB's ***Statement of Financial Control and Accountability***.

Specific Policies for Investments from Community Children's Services Fund Tax Revenues

City Residents

Any investment made by MHB which includes local Community Children's Services Fund tax revenues is restricted to services which are provided to City residents age 18 and under. In

programs which do not exclusively serve City residents, MHB funds shall not fund a proportion of the total program budget in excess of the proportion of services to City residents.

Maximum Investment

No single program or project investment from local Community Children's Services Fund tax revenues shall exceed \$750,000 in any fiscal year. If a proposed project is a start-up, the total requested from MHB cannot exceed \$100,000 in the first year. Funding for collaborative early childhood start-up projects awarded to intermediary organizations from Community Children's Services Fund designated Early Childhood funding, cannot exceed \$300,000 the first year.

Certification or License

For services for which the State of Missouri has established licensing or certification standards, MHB shall make investments from the Community Children's Service Fund tax revenues only in support of services which are licensed or certified by the State of Missouri and that contribute to the outcomes prioritized by the Board. Exceptions may be made when one of the objectives of the project is for the service to obtain the appropriate license or certification during the life of the project.

Accreditation

For services for which one or more national organizations have established accreditation, MHB shall have a preference for those programs and/or projects which have attained the accreditation. Exceptions may be made when one of the objectives of the project is to obtain the accreditation during the life of the project.

Three-Year Cycle

MHB's primary use of local tax revenues shall be investments made in a three-year cycle. The first year of this cycle shall be an open competition for investments based on the needs identified by MHB in its needs assessments and the goals prioritized by the Board. The two following years shall be open only to re-applications from those projects which are achieving their specific contracted outcomes and/or which use program learning to demonstrate improved performance to a degree which assures MHB there is a reasonable likelihood of future success. When organizations are not meeting their contracted outcome, MHB may reallocate funds to other providers within the same goal area or to another goal area altogether.

Special Investments

MHB may, from time-to-time, set aside funds from ongoing Community Children's Services Fund tax revenues for *special projects or purposes other than Recurring Project Investments*. MHB also may establish from time-to-time special reserves which may be used for such purposes. A detailed description of each reserve and the specific purposes for which it may be used is available in MHB's *Statement of Financial Control and Accountability*.

General Policies* for Investments from Federal/Other Third-Party Sources

When MHB Will Apply for Additional Funds

MHB will seek to identify and pursue additional outside funding opportunities which fulfill all of the following requirements:

1. The opportunity is consistent with the mission, vision, values, and outcomes of MHB.
2. The opportunity is consistent with current needs that may be identified by MHB's needs assessments.
3. MHB has the capacity to complete the application process by the application deadline and to satisfy the administrative and financial requirements of the funding source over the life of the award.
4. MHB believes that it can make a competitive bid for the funds.

*For detailed policies regarding federal funding please see 'Addendum – Policies Related to Federal Grants'.

MHB's Role

MHB shall serve as the administrator of projects receiving funds by federal/other third-party sources. MHB shall subcontract with community service providers to provide direct services to achieve and/or evaluate and verify results that contribute to MHB outcomes. MHB shall ensure that all requirements established by the funding source are met by its staff and all subcontractors.

MHB shall serve as the facilitator for any required community collaboration effort.

Additional Eligibility Requirements

In addition to MHB's own eligibility requirements, each funder has its own eligibility requirements. MHB will only select community service providers that meet both MHB's eligibility requirements and the federal/other funder's eligibility requirements. Community service providers must also agree to meet not only the service obligations of an award, but also any evaluation and administrative obligations required by the funder. Community service providers must have the capacity to dedicate the resources necessary to fulfill the application requirements and to implement an award on the timelines established by the funder.

Compliance with the *Drug-Free Workplace Act* and the *National Standards for Culturally and Linguistically Appropriate Services in Healthcare (CLAS)* are almost always required. The *Drug-Free Workplace Act* requires that community service providers fulfill the following six (6) criteria:

1. The employer must have a written policy that explains what is prohibited and the consequences of violating the policy.

2. Employees must read and consent to the policy as a condition of employment on the project.
3. The employer must have an awareness program to educate employees about alcohol and other drug abuse and addiction, the employer's policy and available help, counseling, and assistance.
4. Employees must disclose any conviction for a drug-related offense in the workplace to the employer within five (5) days after such conviction.
5. Employers must disclose any conviction for a drug-related offense in the workplace to the Federal agency with which the employer has a grant or contract within 10 days after receiving notice from the employee or others.
6. Employers must make an ongoing effort to maintain a workplace free of drugs.

The *National Standards for Culturally and Linguistically Appropriate Services in Healthcare (CLAS)* standards also require that community service providers meet the following four (4) criteria:

1. Health Care Organizations must offer and provide language assistance services, including bilingual staff and interpreter services, at no cost to each patient/consumer with limited English proficiency at all points of contact, in a timely manner during all hours of operation.
2. Health Care Organizations must provide to patients/consumers in their preferred language both verbal offers and written notices informing them of their right to receive language assistance services.
3. Health Care Organizations must assure the competence of language assistance provided to limited English proficient patients/consumers by interpreters and bilingual staff. Family and friends should not be used to provide interpretation services (except on request by the patient/consumer).
4. Health Care Organizations must make available easily understood patient-related materials and post signage in the languages of the commonly encountered groups and/or groups represented in the service area.

Solicitation of Community Service Providers

When the timeline and requirements of an opportunity allow, MHB shall select community service providers through a competitive process. Unfortunately, most federal and state funds require that service providers be identified before an application is made and on a timeline which prohibits such a process. MHB will, under such circumstances, solicit service providers whom it believes will contribute to the most competitive application possible.

Application Process

Most application timelines are very brief. Organizations interested in being a community partner on such a project should be prepared to dedicate considerable staff hours to meetings and planning in the application process. Community service providers may be asked to write specific sections of an application upon which they have special expertise or knowledge. Community service providers

must submit all supporting documentation required for the application in a timely manner, and often at the last minute.

Fiscal Year

MHB shall utilize subcontracts to make investments based upon the Fiscal Year of the funding source.

Reporting Requirements

Most federal funding programs and third-party funding sources have specific reporting requirements which must be met by recipients. These may include financial, service data, evaluation or other reports. MHB will ensure that all reporting deadlines are met. In the unlikely event that a community partner is unable to supply the information necessary for MHB to meet such obligations, MHB shall take corrective action up to terminating the investment and reassigning it to another community partner.

Disbursements

Most awards made from federal/other third-party revenues are disbursed on an expense-reimbursement basis. Most of these awards also have specific line-item budgets which require community service providers to request approval for any changes in spending *before* they occur.

Specific Policies for Investments Related to Capital Items

Specific Guidelines Related to Capital Investments

Allowable Requests

- For the purposes of this investment, no requests will be entertained for land acquisition, capital campaigns, building acquisitions, expansion of existing buildings or construction of new buildings/facilities.
- Capital improvements in the areas of rehabilitation or enhancement of existing facilities will be considered only if the applicant holds the mortgage on the property to be improved.
- Requests for rehabilitation or enhancement of existing facilities will be considered only for property located within the City of St. Louis.
- All projects that require building or occupancy permits must obtain all permits as required by the City of St. Louis.
- Capital improvement in the areas of major equipment or materials will be considered within the allowable costs identified for this investment.
- All requests must meet any and all applicable general guidelines related to capital investments as outlined in this document.

- MHB shall invest 80% of the cost of the proposed capital improvement or equipment acquisition. The applicant or an identified third-party must invest the first 20% of the total cost of the proposed capital improvement or equipment acquisition.
- A Board resolution from the applicant's organization which supports the applicant's required 20% investment in the proposed project must be included with the proposal.
- The maximum amount that may be requested in any proposal will be \$200,000.
- All organizations that are eligible for MHB funding (as outlined previously in this document) are eligible to apply for a capital improvement/equipment acquisition grant.
- Organizations may submit only one proposal in response to this Notice of Funding Availability (NOFA).
- The Board has identified a total investment of \$1,000,000 for this NOFA.

Prioritization

- Among qualified proposals, first priority will be given to proposals for which clients/participants are the primary beneficiary.
- Among qualified proposals, second priority will be given to proposals for which clients/participants are indirect beneficiaries.
- Among qualified proposals, third priority will be given to proposals for which the organization is the primary beneficiary.

General Guidelines Related to Capital Investments

Major Equipment or Materials Guidelines

The following guidelines apply to all capital requests.

- MHB requires that three bids be obtained and submitted by organizations when requesting funds for purchase of capital items including equipment, construction, renovations, vehicles, and other capital requests when the unit cost is \$3,000 or more. Agencies shall use the following procedures when obtaining bids on capital items with a unit cost of \$3,000 or more and a useful life of more than one year:
 - Specifications shall be written in sufficient detail to assure consistent response to the organization's request for bids.
 - Organization bid requests shall be submitted to similar vendors.
 - Organizations shall submit a minimum of three signed bids specifying agency bid preferences.

- In the event that organizations do not select the lowest bid, a written rationale must be provided for approval.
- In the event there are less than three vendors responding to a bid request, agencies must request a waiver of policy from MHB prior to purchasing the item(s). Certification from the agency of their independence from selected vendor in relation to the organization's board, employees, and participants must be submitted with the request.
- Organizations shall maintain accurate inventory control procedures of capital items purchased with MHB funds. Organizations are required to clearly identify items by specific MHB project and component numbers.
 - Organizations shall receive payment from MHB upon verified completion of project or receipt of equipment.
 - Organizations shall maintain a control system to ensure adequate safeguards to prevent loss, damage or theft of property. Agencies that experience any loss, damage or theft of capital items purchased with MHB funds shall have an investigation conducted. A written copy of the investigation findings shall be submitted to MHB. A statement describing how agencies will replace the item(s) must also be included.
- All capital items purchased with MHB funds shall be depreciated in accordance with accounting principles generally accepted in the United States (GAAP). MHB recommends that organizations establish and fund a depreciation reserve, if possible, to provide for the future replacement of capital items.
- Organizations will have and maintain adequate comprehensive property insurance for all capital items purchased, constructed or renovated in part or in full with MHB funds to assure replacement of the organization's capital assets in the event of a loss due to an insurable event. Documentation of insurance shall be submitted to the MHB on an annual basis.
- If capital items purchased, constructed, or renovated with MHB funds are found not to be used during a consecutive six-month period of time while they are owned by the organization, said capital items will be made available to the MHB for reassignment to another organization, or for sale, with proceeds returning to MHB.
- MHB approval is required prior to selling, trading or reassigning any capital items purchased, constructed or renovated with MHB funds.

Construction and Renovation Guidelines

These guidelines apply to all renovation requests.

- MHB and/or its agents reserve the right to:
 - Review and approve all contractual agreements related to the projects.

- Review and approve all original and revised project plans, including but not limited to design, cost, regulatory requirements, zoning issues, and proposed services.
- Monitor the progress of the renovation and, at the MHB's discretion, certify satisfactory percentage of completion prior to funds disbursement.
- If the organization either sells or trades the facility that was renovated with MHB funds or ceases to provide the same services at such facility, then all or part of MHB funds disbursed to the agency for this project shall be repaid to MHB. The amount of funds to be repaid to MHB will be calculated as follows: Total amount of funds disbursed less one tenth per year for each year the property is used for the purpose represented in the project. MHB reserves the right to require an organization to repay the total amount of funds granted for renovations if the organization sells their facility or ceases to provide the same services.
- If the facility is sold and the organization reinvests the sale proceeds in another facility to be used for the same purpose, the organization shall be liable to refund only the excess sale proceeds not reinvested in the new facility. This refund shall be limited to the amount of the grant provided to the agency.
- If the organization ceases to provide the same services at such facility, but continues to use the facility in a manner that would otherwise meet the statutory and policy requirements of the MHB, no refund of the grant provided shall be required as long as the organization receives prior approval from MHB. Any change in the services rendered at the facility may be made only after application to and written approval from MHB.

Vehicle Acquisition

MHB will consider granting funds to organizations to purchase vehicles that are used primarily for transporting participants eligible for MHB-funded services. If MHB funds are requested to replace existing organization vehicles, MHB may require the organization to reduce the costs to MHB by the book or trade value of the vehicle to be replaced.

- Applications for funds will be considered for replacement of organization vehicles only when the odometer reading is at least 100,000 miles and the vehicle is four years old, or it can be demonstrated that the vehicle is inoperable due to accident or total mechanical failure not caused by negligent maintenance.
- It is the intent of this policy to encourage organizations to raise equity through fund raising for the replacement of vehicles. Therefore, MHB recommends that when organizations depreciate vehicle capital assets, a funded reserve should be established.
- Organizations are required to provide the MHB with vehicle identification numbers and other appropriate identifying information on vehicles purchased with MHB funds, for purposes of monitoring the application of this policy.

- Organizations must submit a request in writing for the MHB's permission to dispose of a vehicle purchased with MHB funds. Vehicles may be sold outright to a third party, transferred to another not-for-profit organization for similar use or purchased by the organization for use in another service.

Addendum – Policies Related to Federal Grants

MHB serves as a pass-through entity administering projects which are federally funded. In these cases, all MHB policies described above are applicable to any subawards (statutory requirements, conflict of interest, HIPPA, etc.). There are however additional subaward compliance requirements for which MHB as the administrator of federal funds must comply.

The full Uniform Guidance or (CFR 200-331) can be referenced here:

<https://www.gpo.gov/fdsys/granule/CFR-2014-title2-vol1/CFR-2014-title2-vol1-sec200-331>

In procuring services in partial fulfillment of a federal grant, MHB will first make a case-by-case determination whether each agreement it enters for the disbursement of federal program funds casts the party receiving the funds ("awardee") as a subrecipient or a contractor. The determination will dictate whether MHB treats the agreement as a "subaward" or a "contract," and that treatment will impact whether certain terms are included in the agreement. MHB will use the factors set forth in 2 CFR 200.330 to make that determination.

Those community service providers deemed as subrecipients will enter into a subrecipient agreement only after a risk assessment of the organization has been conducted. The risk assessment includes a suspension or debarment verification process through the System for Award Management (SAM) exclusions list and a financial audit review including the organization's single audit when applicable.

The subaward agreements themselves include all required elements as per 2 CFR 200.331. Throughout the term of the subaward agreement, subrecipients are monitored via periodic site visits, records audits (including management decisions related to appropriate use of federal funds). All monitoring information is housed in a centralized subrecipient master dashboard which reflects each step and item.

In addition to subrecipient agreements for direct service providers, MHB may subcontract with consultants and/or vendors (contractor) who provide general services related to other aspects of the grant. Beginning July 1, 2018, with any contractor MHB will utilize the small purchase methodology (when acquisition cost is greater than \$10,000 but less than \$150,000) whereby price or rate quotations will be obtained from at least two qualified sources and in full compliance with 2 CFR 200.321. In the unlikely event the acquisition costs exceed \$250,000, MHB will be in full accord with 2 CFR 200.323.

FINANCE

FY 2023 Revised Approved Budget (November 2022) – Modified Cash Basis

	FY 2023 Approved Budget	Admin	EC	CSF	MHF	Federal Programs, VPC & Braided Funding	FY 2023 Revised Approved Budget	Variance +/(-) to Approved Budget
Revenues								
Tax Revenues	\$16,662,226	\$ -	\$2,860,828	\$9,290,947	\$4,410,451	\$ 100,000	\$16,662,226	\$ -
Federal Programs - HHS SAMHSA SOC	1,230,928	-	-	-	-	1,230,928	1,230,928	-
Federal Programs - ARPA ECE	-	-	-	-	-	2,000,000	2,000,000	2,000,000
Federal Programs - VPC	-	-	-	-	-	450,000	450,000	450,000
Grants - Violence Prevention Commission	116,895	-	-	-	-	591,895	591,895	475,000
Miscellaneous Income	450	450	-	-	-	-	450	-
Administrative Service Fees - Senior Fund	31,488	31,488	-	-	-	-	31,488	-
Dividends and interest, net of fees	224,885	-	-	105,007	119,878	-	224,885	-
Total Revenues	\$18,266,872	\$ 31,938	\$2,860,828	\$9,395,954	\$4,530,329	\$4,372,823	\$21,191,872	\$2,925,000
Expenses								
Community Investments								
Competitive Grants	12,636,184		2,031,336	7,430,000	3,174,848	-	12,636,184	-
Partnerships and Initiatives	775,000		-	500,000	150,000	75,000	725,000	(50,000)
Federal Grants - ARPA ECE	-			-		1,941,119	1,941,119	1,941,119
Federal Grants - SOC Subawards	882,289			-		882,289	882,289	-
System Building	483,417	77,500		-		956,046	1,033,546	550,129
VPC - Grants	65,145			-		65,145	65,145	-
Federal Grants - VPC	734,400	-	-	-	-	1,028,782	1,028,782	294,382
Emerging Needs (previously Unanticipated)	1,171,280		585,280	320,000	266,000	-	1,171,280	-
Personnel Costs - Salary - Direct Project Exp	610,007	-	53,961	222,811	183,450	200,731	660,952	50,945
Personnel Costs - Fringe - Direct Project Exp	184,805	-	18,687	70,485	57,978	42,978	190,128	5,323
Total Community Investments	\$17,542,527	\$ 77,500	\$2,689,264	\$8,543,296	\$3,832,276	\$5,192,090	\$20,334,425	\$2,791,898

Operating Expenses	FY 2023 Approved Budget	Admin	EC	CSF	MHF	Federal Programs, VPC & Braided Funding	FY 2023 Revised Approved Budget	Variance +/(-) to Approved Budget
Personnel Costs - Salary	418,597	451,191	-	-	-	-	451,191	32,594
Personnel Costs - Fringe	145,145	155,934	-	-	-	-	155,934	10,789
Professional Development	19,250	19,250	-	-	-	-	19,250	-
Professional Fees	107,500	109,000	-	-	2,000	15,000	126,000	18,500
Rent & Other Occupancy	75,500	75,500	-	-	-	-	75,500	-
Public Awareness	21,000	21,000	-	-	-	2,000	23,000	2,000
Information Technology	98,500	106,000	-	-	-	-	106,000	7,500
Dues & Subscriptions	6,000	6,000	-	-	-	-	6,000	-
Meeting Expenditures	5,000	5,000	-	-	-	-	5,000	-
Travel	7,500	7,500	-	-	-	-	7,500	-
Telephone/Communications	9,524	9,500	-	-	-	24	9,524	-
Equipment	21,500	29,500	-	-	-	-	29,500	8,000
Insurance	12,000	12,000	-	-	-	-	12,000	-
Office Supplies	3,000	3,000	-	-	-	-	3,000	-
Miscellaneous/Other	2,000	2,000	-	-	-	-	2,000	-
Total Operating Expenses	\$ 952,016	\$1,012,375	\$ -	\$ -	\$ 2,000	\$ 17,024	\$1,031,399	\$79,383
Indirect (Revenue) Expense	-	(187,431)				187,431	-	-
			17.17%	56.36%	26.47%			
Admin Fund Allocation	(0)	(870,506)	149,462	490,623	230,421	-	(0)	-
Total Expenses	\$18,494,543	\$ 31,938	\$2,838,726	\$9,033,919	\$4,064,697	\$ 5,396,545	\$21,365,824	2,871,281
Housing Projects (Cash Outlays)	500,000				500,000	-	500,000	-
Transfer To (From) Net Position	\$ (727,671)	\$ -	\$ 22,102	\$ 362,035	\$ (34,368)	\$(1,023,722)	\$ (673,952)	\$53,719
Cash & Investment Balance - Begin of Year	23,608,778	2,551,593	11,244,988	8,323,194	1,115,148	23,447,883		
Cash & Investment Balance - End of Year	22,881,107	2,573,695	11,607,023	8,288,825	91,426	22,773,930		

Accounting Policies and Procedures (Last Revised November 2021)

General

The 7 Trustees of Saint Louis MHB (“MHB”) operates on a fiscal year that begins on July 1 and ends on June 30.

All transactions shall be recorded in the financial records using a double-entry accounting system. All cash accounts shall be reconciled monthly, and all investment accounts shall be reconciled quarterly by the Accountant and reviewed by the Controller. The Executive Director reviews the cash reconciliations and investment reconciliations on a monthly and quarterly basis, respectively.

Modified cash-basis financial statements, which reflect appropriate accruals for tax revenue, investments, interest receivable, grants receivable, prepaid expenses, grants payable and other accruals shall be prepared each quarter by the Accountant and reviewed by the Controller and compared to the budget and prior-period amounts. The Executive Director reviews and approves these statements, which are then presented to the Board of Trustees. The Board of Trustees reviews and approves the financial statements on a quarterly basis in November, February, May and September.

At fiscal year-end, accrual adjustments are prepared for housing grants receivables, capital assets and pension adjustments. Annual full accrual-based financial statements are presented to the Board of Trustees in the form of a draft of the annual audit report. Once approved, the draft is finalized, and no additional adjustments are made to the prior fiscal year.

MHB employs two Certified Public Accountants to record transactions and prepare reports and financial statements.

Internal Control Elements

- MHB employs a Certified Public Accountant to serve as the Accountant
- MHB employs a Certified Public Accountant to serve as the Controller
- The Executive Director oversees the accounting function
- The Accountant reconciles cash monthly and investments on a quarterly basis
- The Controller reviews the reconciliations
- The Executive Director reviews the reconciliations
- The Board of Trustees review the financial statements on a quarterly basis

Software, Support and Storage

MHB shall use financial accounting software for MHB’s general ledger, which shall include actual transactions, utilize the budget function and provide for a complete audit trail. MHB uses Intuit QuickBooks Desktop Enterprise Solutions, Nonprofit edition. The software shall be able to track activity on the individual grants that MHB provides as well as funds that MHB manages. MHB tracks funds and Federal grants using the Class tracking function in QuickBooks.

QuickBooks should be backed up at least monthly and stored on a remote server monitored monthly by MHB’s contract IT service provider. Access to back-up files shall be limited to individuals authorized by management.

It is the policy of MHB to utilize passwords to restrict access to accounting software and data. Only duly authorized personnel with data input responsibilities will be assigned passwords that allow that type of access to the system. Other personnel may have access to the areas required by their duties; their access

may be restricted by area, or they may have read-only access (see Technology section for additional information regarding passwords and access).

Internal Control Elements

- Backup copies are stored on the servers, which are remotely backed up by MHB's contracted IT services
- A contract IT service provider conducts monthly maintenance

Technology

All technology needs shall be the responsibility of the Digital Manager. The Digital Manager shall oversee development of MHB's website, create and maintain computer usernames, and perform basic technical support tasks, such as updating and installing software on computers and resolving minor printer/copier technical issues.

Complex technical issues, as well as the design and support of the Organization's website, shall be outsourced to local service providers. The Digital Manager shall monitor the outsourced agents as they perform duties such as repairing equipment and setting up computers for new employees.

The Digital Manager shall also monitor the usage of such technology as MHB's laptops and projectors, and for any other technology purchased in future that will be made available to employees.

The Digital Manager shall maintain the security access for the accounting software, which shall have multi-user accessibility. The Digital Manager shall establish access for new staff in a timely fashion and ensure that user accounts are promptly closed when personnel leave MHB employment. Each employee shall have a unique username and password. This information shall not be shared with other employees or outside parties.

The Digital Manager shall keep a copy of employee usernames and passwords in secure location on the agency server, which is backed up remotely by the IT service provider.

Internal Control Elements

- The Digital Manager oversees any outside technicians hired to perform technology maintenance or repairs
- A log is maintained to track use of MHB's capital assets. The Director of Operations is responsible for oversight of the capital assets
- Individual usernames and passwords are assigned to MHB employees
- A copy of all employee usernames and passwords is kept in a secure location on the agency server, which is backed up remotely by the IT service provider
- Only the Digital Manager can set user access rights

General Office Security

The Executive Director determines who is to be issued keys to the office building and office suite. Upon termination of employment, all keys will be returned to the Digital Manager or Executive Director prior to issuance of final paycheck. Only the Executive Director and the Controller have keys to access the investment and payroll records. Only the Director of Operations and the Controller have keys to the check stock drawers and the accounts payable cabinet.

Internal Control Elements

- The Controller's desk where check stock is locked and only two MHB employees have a key—the Controller and the Director of Operations.
- The file cabinets in the Controller's office are also kept locked and only the Controller and Executive Director have keys.

Budgeting

MHB shall establish an annual operating budget. The budget process shall be overseen by the Controller. The budget is prepared annually by the Accountant and Controller in consultation primarily with the Executive Director, with support from the Digital Manager, the Project Director responsible for Federal grants, the Director of Operations, and the Deputy Director. The budget is reviewed by the Executive Director and Finance Committee.

The budget shall be prepared in accordance with the MHB Budget Development Process, summarized as follows:

- **A year-end forecast** for the current year, at both the agency level and program fund level shall be prepared in early April. The forecast shall be based on actual revenue and expenses for the 9-month period from July 1-March 31 plus an estimate of revenue and expenses for the fourth quarter (April-June). The fourth quarter estimate will be done by the Accountant and Controller in consultation with the appropriate MHB staff, documented in a spreadsheet with backup worksheets and reviewed by the Controller. The completed forecast will consist of the total annual revenue/expenses (at both fund and agency levels) calculated from quarter 3 actuals, added to the estimated quarter 4 revenue/expenses.
- A proposed budget for the coming year is also prepared at both the fund and agency levels by the Accountant and Controller in consultation with the appropriate MHB staff and reviewed by the Controller. The current year forecast is used as the baseline estimate for the coming year using the following steps: (1) Tax revenues are estimated based on the tax rate calculator prepared by the Controller and reviewed by MHB's legal counsel, in addition to analysis and discussion of historical averages. (2) Federal revenues (mapped to MHB's fiscal year) are calculated based on current Federal grants/agreements. (3) The Accountant will identify all community investment expenses with cost-of-living adjustments or other changes based on information provided by the Deputy Director. (4) The Accountant shall identify all operating expenses scheduled to increase in the next fiscal year (such as, office lease, personnel salaries and benefits, and professional or consulting fees). (5) The Accountant shall identify one-time (non-recurring) expenses for the proposed fiscal year. (6) The Accountant shall prepare estimates for any remaining operating expenses. (7) The

Accountant shall estimate expenses for any remaining line items based on current year forecast. The Controller shall review all the above steps.

- A budget template based on the GL chart of accounts shall be prepared by the Accountant and Controller that documents all updated tax, Federal and other revenues, then documents known and assumed increases, and decreases from the current year expenses. Once created, in mid to late May, the Accountant drafts the coming year budget using the budget template with **explanations** for any significant variances. All the steps must be completed at both program level and rolled up to an agency total. An administration charge-back rate must also be developed based on a standard rationale that re-allocates administrative costs back to the appropriate tax fund. This budget, with all backup documents, is then reviewed by the Controller and submitted to the Executive Director.
- A shift of 25% or greater to any budget category shall trigger a revision to the Budget which will be prepared and presented to the Trustees for approval via Resolution the month subsequent to the shift.

The Executive Director reviews and comments on the drafted budget during the end of May. The Controller makes any necessary adjustments and finalizes the total agency and program budgets to present to the Finance Committee the first week of June. The budget is sent to the Trustees with their June Board meeting materials using the budget template along with a comparison of the proposed budget to the current year forecast, plus an accompanying Budget Resolution for the next fiscal year starting July 1. The Board of Trustees votes on the proposed budget during the June board meeting.

Once approved by the Trustees, the Accountant will enter the approved budget in the QuickBooks budgeting module by account number and by Class. The Controller will use this budget information to present quarterly financial reports to the Board that provide a year-to-date to budget comparison of actuals to budget and explanations of any significant variances.

Internal Control Elements

- Tax revenue estimates are prepared by analyzing the tax rate calculator reviewed by MHB's legal counsel, as well as reviewing historical averages.
- The budget is prepared by the Accountant and Controller, in close consultation with the Executive Director, reviewed by the Controller, and approved by the Executive Director for presentation to the Finance Committee and Board of Trustees
- The budget is reviewed, amended, and approved by the Board of Trustees

Annual Audit and Single Audit Report

Independent auditors shall be selected competitively through a periodic public request for proposals process. To assure the public of accountability, an independent auditor shall examine the annual financial report prepared by MHB. When \$750,000 or more in Federal awards are expended in a fiscal year, the provisions of OMB Circular A-133 shall apply.

Internal Control Elements

- Independent auditors are selected through a competitive proposal process
- Pursuant to the Office of Management and Budget, Single audits are performed for Federal expenditures exceeding \$750,000

General Ledger and Chart of Accounts

A standard Chart of Accounts shall be maintained. General ledger accounts are used to accumulate transactions and record the impact of these transactions on each asset, liability, net asset, revenue, expense, and gain and loss accounts.

A Class List shall also be maintained to identify transactions within specific projects. Each major funding source / Federal grant shall be defined as a separate Class in QuickBooks. Current Classes in QuickBooks include Administration, Children's Services Fund, Early Childhood Fund, Mental Health Fund, (Federal) 2020 SAMHSA-SOC, (Federal) 2021 SAMHSA-SOC, Regional Response Team (RRT), St. Louis Area Violence Prevention Commission (VPC), (Federal) SOC Match, CARES, St. Louis Continuum of Care (CoC) 2020 Federal Expenses, CoC Match, Braided Funding, and Director of Children, Youth and Families. The Controller shall provide oversight of the maintenance and updating of both the Chart of Accounts List and Class List based on approval from the Executive Director. Only the Controller and Accountant have the authority in QuickBooks to create new accounts and new Classes; the Executive Director, however, must authorize any changes in Class or Chart of Accounts. The Executive Director has read only access to QuickBooks.

The Controller shall prospectively evaluate MHB's accounting system on a continued basis and shall promptly advise the Executive Director when current systems, policies or procedures require revision to meet forthcoming rule changes (e.g., announced GASB and/or FASB changes or other industry developments). Additions to, deletions from, or any other changes to the Chart of Accounts shall be made by the Controller with approval of the Executive Director.

Only the Accountant and the Controller are authorized to make journal entries in QuickBooks. Bi-weekly payroll journal entries are made by the Accountant based on information from the Journal Entry Payroll spreadsheet. The journal entries are saved on the M: drive in a Journal Entry folder and reviewed by the Controller. The information entered on the Journal Entry Workbook is taken directly from the payroll providers bi-weekly payroll report. Other journal entries include quarter-end and year-end accruals for payroll, tax receipts, prepaids, accrued vacation and other items.

Internal Control Elements

- Only the Controller and Accountant have the authority to create accounts for the Chart of Accounts and Classes for the Class List
- The Executive Director reviews the Chart of Accounts and Class Lists with the quarterly financial statements. Reclassifications or consolidations are recommended during this review, if needed.
- No changes can be made to the Class List or Chart of Accounts without authorization by the Executive Director
- The Executive Director has no access to the accounting software

Bank Reconciliations

The Accountant shall prepare bank reconciliations for each MHB cash account monthly and the Controller shall review the bank statements and reconciliations. MHB has one operating checking account (XXX-5896), an Investor's Money Market account for the Mental Health Fund (XXX-6190) and an Investor's Money Market account for the Children's Services Fund (XXX-6158). A special Investor's Money Market account was created in fiscal year 2021 to facilitate the CARES funding (XXXX-8152). The Executive Director shall review the reconciliations as they are completed and initial and date them after review. All discrepancies shall be investigated and resolved.

Bank reconciliations are filed remotely on the M: drive along with each monthly bank statement.

Internal Control Elements

- The Accountant reconciles bank accounts on a monthly basis
- The Controller reviews the bank reconciliations on a monthly basis
- The Executive Director reviews and signs the reconciliations

Prepaid Debit Cards

MHB authorizes the use of Prepaid Cards on an as needed basis to support programs when upfront payment is preferred on projects (typically by individuals not employed by MHB).

When prepaid cards are utilized, the Project Director emails the Director of Operations all information required on the holder and use of the card. The Director of Operations obtains a signed Acknowledgement and Attestation form from the card holder. The Executive Director signs the Attestation form as well, and a copy is provided to the Controller for Processing.

Within 15 days of the attestation form receipt(s) quarter-end due date, all receipts provided to Project Director should be sent to Operations Director for reconciliation. In lieu of a receipt, in approved circumstances an email from the user indicating amount, date, and use can be sent. The Accountant will record all transactions in QuickBooks on a quarterly basis. Remaining funds on the card will be drawn back and/or closed by the Controller.

Prepaid Expenses

It is the policy of MHB to treat payments of expenses that have a time sensitive future benefit for the next fiscal period as prepaid expenses at fiscal year-end and to amortize these items over the corresponding time period. For purposes of this policy, payments of less than \$1,000 shall be expensed as paid and not treated as prepaid expenses, regardless of the existence of a future benefit.

Prepaid expenses with future benefits that expire within one year from the date of the financial statements shall be Classified as current assets. Prepaid expenses that benefit future periods beyond one year from the financial statement date shall be Classified as non-current assets. All payments made for property, liability, automobile, Public Official Bond and Public Employee Dishonesty insurance will be coded as prepaid expenses.

The Controller shall maintain a schedule of all prepaid expenses. The schedule shall indicate the amount and date paid, the period covered by the prepayment, the purpose of the prepayment, and the quarterly amortization. This schedule shall be reconciled to the general ledger balance as part of the quarterly closing process. Because prepaid expenses are recorded on a quarterly basis, both the

Executive Director and the Board of Trustees can review the statement of net worth for unusual items or substantial changes from the prior period.

Internal Control Elements

- The Controller keeps an updated list of vendors included in the prepaid balance, including period of months unamortized and cost per month
- The Executive Director and Board of Trustees review quarterly financial statements

Investments

MHB considers all short-term investments with an original maturity of three months or less at the time of purchase to be cash equivalents. Investments are presented at fair value in accordance with GASB guidelines and unrealized gains and losses are included in the statement of revenues, expenses and changes in net position.

The Board of Trustees determines and approves the investment policy for MHB. See Appendix 1 for the current investment policy.

MHB shall invest unused funds and reserves in investment vehicles that adhere to the MHB's Investment Policy. The Executive Director shall be responsible for overseeing and communicating with the financial institution holding the investments regarding the reinvestment of funds as they mature. The Executive Director may from time to time, direct the Controller to communicate with the financial institutions regarding transfers to the checking account or withdrawals from the investment accounts to address cashflow needs of the organization.

The Accountant shall record the investments in QuickBooks on a quarterly basis using the monthly investment statements and maturity notices received from the financial institution. The Controller shall review the monthly investment statements and QuickBooks entries on a quarterly basis. The Executive Director reviews, initials and dates each monthly investment statement. All discrepancies between the maturity notices and the monthly statements shall be investigated and resolved in a timely manner. Investment statements shall be kept in the Controller's Office and on the M: drive, sorted by fiscal year. Investment information is included in the quarterly financial statement presented to the Board. The Board approves the financial statements each quarter at its meetings.

The Executive Director authorizes any transfers from the Investment Accounts. Either the Executive Director or the Controller may initiate the transfer through an email to the financial advisors.

On an annual basis, the Financial Advisors present financial information to the Finance Committee of the Board of Trustees. The presentation informs the committee members of both current investment position and future expectations for each fund.

Internal Control Elements

- The Executive Director authorizes any transfers from the Investment Accounts
- The Accountant records investments on a quarterly basis using monthly investment statements and maturity notices provided by the financial institution
- The Controller reviews the investment statements and QuickBooks entries on a quarterly basis.
- The Executive Director reviews and signs monthly statements
- The Board of Trustees approves the financial statements, which include investment adjustments, on a quarterly basis, and on an annual basis with the audit

Fixed Asset and Property Management

MHB shall capitalize all purchases of furniture and equipment, leasehold improvements, vehicles or other capital assets with a cost over \$5,000. Items with unit costs below this threshold shall be expensed in the year purchased. MHB shall maintain sufficient property insurance to cover all such capital assets.

MHB shall complete an inventory of all capital assets every other year. The inventory shall be conducted by the Digital Manager and one other MHB employee. Together, they shall physically view and count all capital assets. The total count shall be compared to records kept by the Controller. If any discrepancies are noted, they shall be investigated, and the records updated. The capital asset records shall be adjusted for all purchases and disposals.

Capital asset records shall include at least the following information:

- Name of the asset
- Description of the asset (including brand and model number if applicable)
- Unique identifier for the asset (manufacturer's serial number, inventory tag number, etc.)
- Funding source of the equipment, including award number (if applicable)
- Whether title vests with the funding source and the date (if ever) on which the funding source relinquishes claim to the asset
- Acquisition date
- Acquisition cost
- Estimated useful life
- Physical location of the asset
- The staff person assigned to each asset

The Digital Manager shall maintain a file of records with any attached correspondences for all assets disposed of by fiscal year.

Assets shall remain on the inventory of fixed assets unless MHB physically disposes of the asset. MHB shall not dispose of any asset to which an outside funding source maintains a claim of title unless written authorization is obtained from the funding source to dispose of the asset. Any such correspondence shall become part of the capital asset record for such items.

Any *capital assets or equipment* with a unit cost of \$5,000.00 or more that is purchased with funds from MHB must be retained and used continually for the purposes originally intended for a period of five years from the date of purchase. MHB may inspect or repossess any such asset during that five-year window.

Capital fixed assets are accounted for at their historical cost and all such assets are subject to depreciation over their estimated useful life using the straight-line method. Estimated useful lives of capitalized assets shall be determined by the Controller. The following is a list of the estimated useful lives of each category of fixed assets MHB owns.

- Furniture and Fixtures – up to 10 years
- General office equipment – 5 years
- Computer hardware and peripherals – 5 years
- Computer software – 3 years

For accounting and interim financial reporting purposes, depreciation expense will be recorded on an annual basis.

Internal Control Elements

- Fixed asset inventories are completed on a bi-annual basis
- Correspondence and other documentation supporting disposals are filed with a copy of the capital asset record

Accrued Liabilities

The Accounting Department shall establish a list of commonly incurred expenses that may be accrued at the end of the accounting period. Accruals that may be recorded for known expenses for which an invoice has not yet been received include accrued payroll, accrued payroll liabilities, utilities, direct mail expenses, etc. Accrued payroll is recorded when a paycheck is dated for a service period that falls in the previous fiscal period.

Accrued Vacation and Sick Time

Unused accrued vacation is paid out upon termination and thus accrued at the end of each quarter. Unused sick time is not paid out upon termination and is not accrued. Personal time is not paid out upon termination and is not accrued. See details regarding vacation policy at Appendix 2.

Credit Cards

Credit cards are issued only to staff authorized by the Executive Director. Credit cards must be returned upon employment termination. The Executive Director reviews and approves purchases on staff credit cards either in advance of the charges or at the time the bill is paid. Charges made by direct reports should be authorized by the Cardholder, in writing. Charges more than \$10,000 must be authorized, in writing, by the Executive Director.

Credit cards are paid off monthly; no balance accrues. Employees to whom credit cards are issued, are required to maintain balances under the limits established by the credit card company. The Accountant records credit card charges upon receipt of the monthly bill and itemizes each charge by natural expense category and functional Classification. The charges are entered on an accrual basis as of the date of the transaction. The Accountant reconciles the credit card on a monthly basis. The Controller reviews the monthly credit card statement and reconciliation. The Executive Director reviews the credit card statement monthly when the bill is queued for payment.

Internal Control Elements

- All charges by direct reports must be authorized in writing
- Credit card charges over \$10,000 must be approved by two authorized check signers, the Executive Director or Deputy Director and a Board Officer.

Permanent Supportive Housing and Debt Forgiveness

MHB operates a Permanent Supportive Housing initiative (PSH) to increase the number of permanent supportive housing units available for adults living with serious mental illness and/or substance use disorders. As a part of the PSH, MHB provides 10-year forgivable loans or grants to agencies to create new units of permanent supportive housing, thus increasing the PSH supply. Proceeds of the forgivable loans are used to finance renovation and improvement and/or purchase of residential properties, or to construct new units of permanent supportive housing. In all instances, recipient agencies own the properties.

On the anniversary of each loan, one tenth of the outstanding principal balance is forgiven if the property clears a recertification process attesting to its adherence to the approved uses and service to City

residents. Upon maturity date of the loan, the remaining principal balance and accrued interest shall be deemed satisfied and discharged. If, however, the property owner defaults on the contracted agreement, the remaining outstanding principal balance plus 4% interest on the entirety of loan agreement will be due.

The funds are transferred via wire and are subject to validation by MHB's bank. See wire transfer procedures in section "Cash Disbursements and Accounts Payable – (Non-Grant) Section C. Wire Transfers"

One-time funds, which are used to renovate or replace an item or system within a housing structure, are typically considered as grants and do not require repayment or loan forgiveness.

Internal Control Elements

- The Executive Director AND a Board Officer approves the Wire Transfer initiated by the Operations Team within SinglePoint. See wire transfer procedures in section "Cash Disbursements and Accounts Payable – (Non-Grant) Section C. Wire Transfers"
- PSH properties with forgivable loans are certified annually prior to forgiveness of 10% of the loan
- If the property owner defaults on the contracted agreement, the remaining outstanding principal balance plus 4% interest on the entirety of loan agreement will be due

Components of Net Position

Investment in capital assets consists of the costs of furniture and equipment, and software, net of the related accumulated depreciation and/or amortization expense. An amount equal to the capital assets shall be categorized as Investment in Capital Assets as a component of net position.

Funds that are commonly designated as components of net position are as follows.

- Appropriated for Grants, Partnerships and Initiatives in the Upcoming Fiscal Year – funds committed for specific grants, project expenditures and collaborative programs in the next fiscal year are designated as appropriations
- Forgivable Loans for Mental Health Supported Housing Loans – loans issued to agencies for housing projects expected to be forgiven in future years are non-spendable
- Designated for Unanticipated Projects – funds designated by MHB for grants, project expenditures and collaborative programs in the next fiscal year which have not yet been appropriated for specific agencies/projects
- Designated for Administration – funds designated for administration of projects in the next fiscal year
- Unreserved/Undesignated – MHB has established a fiscal policy which requires maintaining an unrestricted/unreserved net position for emergency, unanticipated needs, unusual expenses or operational shortfalls. Under the policy MHB shall maintain aggregate unrestricted/unreserved funds of between 25% and 100% of annual non-Federal expenditures.

Cash Receipts, Revenue, Billing and Accounts Receivable

Most of MHB's receipts are in the form of checks mailed directly to MHB. Primary sources of revenue include the City Collector of Revenue, License Collector of the City of St. Louis and the Payment Management System for Federal Draws. Separate bank accounts are maintained to receive each tax

revenue fund, the Mental Health Fund and the Children's Services Fund.

Checks that are received are recorded, documented and deposited according to the following process:

- A. The Director of Operations shall sort and separate any envelopes containing checks from other miscellaneous items that arrive in the mail. The Director of Operations shall open the mail, record all incoming checks in a log, and make copies of all checks received.
- B. It is the policy of MHB that all checks received that are payable to MHB shall immediately be restrictively endorsed by the Director of Operations. The Director of Operations shall prepare a duplicate deposit slip and attach the deposit slip, a copy of the checks, and the receipt record or printout detailing the revenue received to the documentation provided with the check. The Director of Operation shall submit the deposit to the Executive Director (or to the Deputy Director in the Executive Director's absence) for review and approval.
- C. After the deposit has been approved, the Director of Operations shall take the deposit to the bank. Deposits shall be made on the same day the checks are received. If the Director of Operations is unable to make a same day deposit, the check(s) shall be kept in a secure location in the Controller's office and deposited the next business day. After the deposit is made, the Director of Operation scans the bank deposit receipt, the approved deposit slip, a copy of the check(s) and any supporting documentation to the M: drive. The Director of Operations then emails the Accountant (and CC'ing the Controller) indicating that a deposit has been made.
- D. The Accountant records the deposit in QuickBooks and saves a copy of the QuickBooks deposit slip in the same M: drive folder as the scanned deposit. The Accountant exports the journal entry associated with the deposit and emails a copy of the journal entry along with the QuickBooks deposit slip to the Controller for review.

- E. The Accountant shall reconcile the deposit slips and associated documentation with the bank statement when preparing the monthly bank reconciliations. Any discrepancies shall be immediately investigated. The Controller shall review the monthly bank reconciliations, compare the reconciliations and related documentation with the monthly bank statement and affix his/her electronic signature to the reconciliation to confirm his/her review. The Executive Director reviews the monthly reconciliations, compares the reconciliations and related documentation with the monthly bank statement and signs/dates to confirm his/her review. Any uncollected tax revenues receivable shall be accrued when quarterly financial statements are prepared.

Internal Control Elements

- Supporting documentation accompanies the tax revenue checks from the City. The Accountant verifies that the check amount reconciles to the supporting documentation and indicates the distribution period for checks in the memo field of deposits in QuickBooks
- The mail is opened by an employee other than the Controller
- Copies are made of checks received in the mail. These copies are kept with other documentation supporting the cash receipt
- Checks are stamped with a restrictive endorsement stamp
- Cash receipts are reviewed by the Executive Director (or Deputy Director in the Executive Director's absence) prior to deposit
- Checks are secured in a locked location overnight when a deposit cannot be made on the same day in which the check was received
- Cash receipts and supporting documentation are reconciled to the bank statement monthly
- The Executive Director reviews the monthly bank reconciliations

Federal Grant Administration

Federal grants shall generally be administered in the same manner as all grant revenue except that the Deputy Director, who is responsible for Federal grants, shall additionally ensure that they are administered in accordance with all Federal guidelines and regulations (for more detailed information, reference *'Addendum-Policies Related to Federal Grants'* within the **Community Investment Policies**). The Executive Director shall provide oversight of Federal grant administration. Typically, Federal funds are paid on a reimbursement basis, from an invoice submitted by MHB through an electronic payment system. Actual receipts shall be compared to the amount budgeted to determine the availability of funds left to be drawn down from the grant.

The Deputy Director shall ensure that MHB has met all contractual obligations necessary before drawing down funds and shall document that those obligations have been met by creating backup documentation for each receivable. The Controller makes all Federal Draws. In the absence of the Controller, the Deputy Director is authorized to make the Federal Draw.

The Deputy Director reviews all direct service and professional contractor invoices related to Federal grants, provides account codes, and signs off on all bills confirming that they are within the scope of the grant in question.

Authorized expenditures are forwarded to the Accountant for input into QuickBooks. Ongoing monthly payments to Direct Service Providers are entered by the Project Director. The Deputy Director reviews direct service invoices and select contractor invoices prepared by the Project Director. All other Federal expenditures are approved by the Executive Director upon check issuance or reviewed monthly with the bank reconciliation.

Invoice payments to Federal subrecipients are made monthly through the ACH system on a date that

coincides with other MHB grants payments authorized by the Executive Director (or Deputy Director when the Executive Director is not available) and a Board Officer. If an expedited payment is required which falls outside the established monthly schedule, authorization by the Executive Director or Deputy Director is required. If subrecipients do not submit invoices for direct service expense reimbursement by the established monthly deadline, then payment will not be issued until the invoice is received.

In addition to monthly payments issued through the ACH system to subrecipients, as noted above, other expenses charged to Federal grant(s) will be handled through the agency's A/P system. Typically, checks are issued after Federally drawn funds have been deposited into the STLMHB operating account. Checks over \$10,000 require two signatures. ACH payments are made within three business days of the Federal Draw. No draw will be made without written (e-mail) authorization from the Deputy Director.

Reports are submitted pursuant to the schedule required by the Federal program(s). Typically, quarterly reports are submitted no later than the last day of the first month after the end of the quarter. The Federal Financial Report (FFR) is due for the quarters ending 3/31, 6/30, 9/30 and 12/31. An annual report is due 90 days after the end of each 12-month reporting period. The Controller prepares a draft of the reports to be reviewed by the Deputy Director. Once the quarterly and annual reports are approved by the Deputy Director, the Controller submits the report via the Payment Management System.

The Executive Director reviews and approves Federal grant disbursement in accordance with the policy set in place in the "Community Investment: Grant Payment" section of this manual. Additionally, The Executive Director reviews all Federal grant revenue receivables as a part of the end of year balance sheet review.

Internal Control Elements

- Actual receipts are compared to budgeted amounts to determine the availability of funds available to be drawn down
- The Executive Director reviews all Federal grant disbursements monthly with all other MHB grants and revenue receivables as a part of the end of year balance sheet review
- The Controller compares revenue receipts to the corresponding receivables and reports discrepancies to the Deputy Director
- The Controller reviews documentation supporting outstanding accounts receivable
- Federal receivables are drawn monthly, at minimum, to clear out any receivables
- Backup grant revenue documentation is kept in the Controller's office
- The Deputy Director approves Federal draw amounts in writing before Controller makes the draw
- Controller and Deputy Director keep copies of the draw confirmation, the supporting QuickBooks report and the email approval of the corresponding amounts by the Controller
- The Deputy Director reviews and approves all quarterly and annual reports prior to submission by the Controller

Investment Income

Income earned on investments (i.e., interest and dividends) shall be recorded by the Accountant by Class. The Controller shall review the entries made to record investment income during the review of the quarterly financial statements prepared by the Accountant. The Executive Director shall review the entries made to record investment income during the quarterly preparation of MHB's internal financial statements. Any uncollected investment income receivable (i.e., interest receivable) shall be accrued when quarterly financial statements are prepared. The Executive Director reviews the investment statements monthly.

Internal Control Elements

- The Executive Director reviews the investment statements monthly
- The Executive Director reviews the financial statements quarterly, including review of investment income.

Cash Disbursements and Accounts Payable – (Non-Grant Payments)

The primary operating account is a checking account that provides for routine business check disbursements, automatic withdrawals, as well as payroll transactions and Federal grant disbursements. No disbursements are made directly from either the Children's Services money market account or the Mental Health Fund money market account. Transfers are made from the respective money market accounts into the operating account to cover accounts payable monthly transactions. The transfers are prepared monthly by the Controller based on the monthly estimated payables and are approved by the Executive Director.

The only exception to above are wire transfers related to funding projects under the Permanent Supportive Housing initiative. Those funds are wired directly from the Mental Health Fund money market account.

All valid accounts payable transactions disbursed through the operating account, properly supported with the required documentation, shall be recorded as accounts payable in a timely manner. Purchases of goods and services shall be initiated only when authorized by a completed contract, lease agreement, procurement documentation or check request. Recurring monthly payments, such as utilities, do not need a contract to initiate payments.

Payments shall be made in a timely fashion to avoid unnecessary interest or late-payment fees. The Executive Director, Deputy Director, Board Chair, Vice Chair and Secretary/Treasurer shall be the only individuals authorized to approved disbursements and sign checks.

For purposes of the preparation of MHB's annual financial statement for the audit, all vendor invoices that are received, approved and supported with proper documentation by August 31st following the fiscal year shall be recorded as accounts payable at June 30th if the invoice pertains to goods or services delivered by fiscal year end.

The following pertains to check (or cash) disbursements:

A. Blank Check Stock / Unused Checks

The Controller shall ensure that unused checks remain in a locked drawer (or locked office) when not in use. Only the Controller shall have access to the drawer. In the absence of the Controller, the Director of Operations can issue checks per the authorization of the Executive Director.

B. Checks or automatic withdrawals for Non-Grant Payments

The Accountant shall prepare checks for all non-grant payments (e.g., rent, office supplies, etc.) every week and ensure that the expenses recorded for each payment are allocated to the appropriate classes (See Section XII, Cost Accounting.) Weekly bills are saved by the Controller and the Director of Operations to the To Be Queued folder on the M: drive. After the Accountant enters the bills from the To Be Queued folder, he/she moves the bill and supporting documentation to the Cassandra Review folder. The Accountant then sends an email to the Executive Director summarizing the weekly bills that need to be reviewed and approved. The Controller and Director of Operations are cc'd on this email. Once approved, the Accountant saves a copy of the approval email as backup for each bill. The approved bills are then moved to the Approved FY21 folder (or to the Approved/Pending Payment folder for ACH's, EFT's and online payments). The Accountant

selects the bills to be paid via check within QuickBooks and emails the Director of Operations indicating the number of checks to be printed and the first check number in the sequence. The Director of Operations prints the checks and obtains signature from the Executive Director (or the Deputy Director in lieu of the Executive Director). The Accountant exports a list of all weekly bills from QuickBooks, including account and class coding, and emails the list to the Controller for review.

The Accountant shall also electronically attach backup documentation (check requests, receipts, travel reimbursements, etc.) to each bill. If at any time the amount being paid does not match the backup documentation attached, the Accountant shall annotate the documentation as to why (e.g., identifying specific line items which were in dispute and why there is a discrepancy).

Non-grantee vendor payments and associated check stubs are filed alphabetically by payee in the Controller's office. Vendor correspondence, vendor contracts, and supporting documentation are stored separately in the Controller's office. Lease agreements and other administrative documents shall be kept in the Controller's office (See Section X, Purchasing).

The Accountant must obtain a waiver of 2nd signature for each check, EFT or ACH greater than or equal to \$10,000, and at least one authorized signature on each check under \$10,000. The first signature must be obtained from the Executive Director or the Deputy Director. The second signature must be from a Board Officer (i.e., Chair, Vice-Chair or Secretary/Treasurer). Exceptions to this rule are as follows: The Executive Director and Deputy Director may sign both the first and second signatures on checks for recurring expenses, such as the office lease and professional fees, up to \$15,000, provided the Board's Secretary/Treasurer has authorized the payees in advance—the list is kept by the Controller. Checks shall not be mailed by individuals who authorize expenditures.

C. *Wire Transfers*

The Executive Director shall be the only MHB employee authorized to approve a wire transfer from MHB's accounts. To prevent anyone other than the Executive Director from initiating wire transfers, a system shall be employed that requires either the Director of Operations or the Controller to initiate a wire transfer within SinglePoint. These transfers must have one approver and only the Executive Director user profile has the ability to make the approval. Confirmation of all wire transfers are delivered to the Controller.

D. *Voided Checks*

The Director of Operations shall mark any voided checks "void" and shall remove the signature area from the check. The check shall be voided in QuickBooks and a description of the reason for the void should be indicated in the memo field. Voided checks are kept in a folder in the Controller's office.

E. *Stale Checks*

It is the policy of MHB to write off checks that are less than \$500 and are more than 6 months old that have not cleared MHB's bank. For un-cashed checks that are more than 6 months old and that exceed \$500, contact will be made with the payee to resolve the issue. All stale checks that are written off within the same fiscal year in which they were written shall be credited to the same expense or asset account that was debited. For stale checks written off in fiscal years subsequent to the year in which the check was written, the credit shall be to "miscellaneous income."

F. Independent Contractors

MHB shall obtain a completed Form W-9 from all vendors to whom payments are made. Payments shall be accumulated over the calendar year and a Form 1099 will be issued to the vendors based on the required IRS timeline and regulations.

Internal Control Elements

- Checks are prepared in QuickBooks by the Accountant, who is independent from those who initiate or approve expenditures, as well as those who are authorized check signers
- Purchases of goods and services are initiated only when authorized by a completed contract, lease agreement, procurement form, check request form or travel reimbursement form
- Only the Executive Director, Deputy Director and Board Officers are authorized to sign checks
- Blank checks are kept in a locked office
- A waiver of 2nd signature is obtained for checks, ACH's, and EFT's greater than or equal to \$10,000
- Signed checks are mailed by the Controller, or the Director of Operations in the absence of the Controller
- Voided checks are maintained in a folder
- Checks are not mailed by individuals who authorize expenses

Community Investments – (Grant Payments)

The Project Directors are responsible for filling out a monthly billing tracker. The Director of Operations (or the individuals designated as responsible for a project by the Deputy Director) shall initiate disbursements for projects funded by MHB by entering a “bill” into QuickBooks. The bill is generated from a purchase order for the agency/project that was entered in QuickBooks by the Accountant at the beginning of the fiscal year and reviewed/validated by the Controller and Director of Operations.

The Project Directors shall prepare monthly (or pursuant to their payment schedule) invoices and backup documentation for each bill/payable. The Project Directors shall verify that award recipients (grantees) have complied with all provisions of their contracts and that payment is made for costs allowable under the contracts.

If, at any time, the amount being paid does not match the backup documentation attached, Project Directors shall annotate the documentation as to why there is a discrepancy (e.g., identifying specific line items which were denied and why, explaining that partial payments were made because the request exceeded the funds available, etc.). These discrepancies are also noted in the Community Investment Master spreadsheet monthly and maintained by the Deputy Director in hard copy files.

MHB shall elect one of three methods to contract with award recipients:

1. Grant-Recipient organizations receive twelve equal payments (the 12th payment may differ slightly from payments 1-11 to account for year-end reconciliations and rounding). Grant payments shall be made when supporting documentation from the recipient organization is received by MHB.
2. Fee-for-service--Monthly payments based on the services provided in the previous period. Fee-for-service payments shall be made when recipients file invoices.
3. Expense reimbursement--Monthly payments are made to direct service providers based on the previous month's verified program expenditures. Expense reimbursements shall be paid when recipients file invoices.

If a recipient does not submit required quarterly reporting, as required in Attachment B of their MHB contract, then MHB shall notify the recipient that their payment will not be processed that month. The Deputy Director shall review each prepared payable and reject any payable which would cause the payments on any project to exceed the total contracted amount.

On the third Thursday of the month (except for July which is the fourth Thursday of the month), the Controller shall create ACH payments from the bills created in QuickBooks. The Controller shall obtain two authorized electronic signatures, including at least one Board Member on each of these ACH payments (regardless of the amount), before they may be processed.

The Deputy Director prepares the Community Investment Master spreadsheet, which indicates, on a cash basis, payments that should be made to grant recipients as well as the amounts to be transferred from the bank accounts to cover those expenses.

The Controller reconciles between QuickBooks and the Community Investment Master Spreadsheet. Then the Controller prepares the ACH batch for the monthly community investment payments and respective bank transfers. The Director of Operations reviews each ACH batch before it is submitted for approval by the Executive Director and Board Officer.

Independently, the Director of Operations shall match each ACH payment to the backup documentation during the reconciliation process and shall stamp the date for each payment processed on the backup documentation. The Director of Operations shall file payment documentation alphabetically in individual grantee files.

Grant-specific contracts shall be kept in the filing cabinets in the file room. All other grant related forms and documents shall be kept electronically within the Foundation Connect grants management system. Copies of grant contracts are also kept in Foundation Connect and saved to MHB's shared "S" drive for easy retrieval.

Internal Control Elements

- Project Directors shall certify that award recipients (grantees) have complied with all provisions of their contracts and that payment is made for costs allowable under the contracts
- If the recipients do not submit their reports as required in their contract, Project Directors notify recipients that their payment will not be processed
- The Deputy Director reviews each grant payment prepared by Project Directors
- The Executive Director reviews each grant payment prepared by the Deputy Director
- The Director of Operations stamps the payment date on the backup documentation for all ACH payments processed
- The Controller reconciles between QuickBooks and the Community Investment Master prepared by the Deputy Director
- The Director of Operations independently compiles the information for the SinglePoint batch and reviews the batch prior to submission by the Controller
- The Executive Director and Board Officer approve the ACH batch before payment is triggered

Purchasing

The primary objective of the purchasing policy is to ensure that expenses incurred by MHB are actual, reasonable, necessary and within the approved budget. The Executive Director and Deputy Director (in the Executive Director's absence) have approval authority over all purchases and contractual commitments as defined in this policy. The Executive Director shall make the final determination on any proposed purchases where budgetary or other conditions may result in denial.

The Mental Health Board shall further endeavor to ensure the availability of supplies and equipment in quantity and quality consistent with MHB standards at the most favorable prices consistent with those standards. MHB shall also strive to ensure that purchases are appropriately allocated to the classes in the general ledger. (See Section XII, Cost Accounting) MHB shall strive to balance these objectives with its desire to minimize the administrative costs associated with them.

MHB shall establish forms and procedures to document the consideration and preauthorization of the following types of purchases:

A. Business & Travel Expenses

MHB shall reimburse employees and Trustees for actual, reasonable and necessary expenses incurred in the performance of their official duties. All such expenses shall be approved by the Executive Director and/or Deputy Director prior to reimbursing the individual who incurred them. The Director of Operations approves expense reports of his/her direct reports. The employee or Trustee must submit an expense reimbursement form (the Trustee form will be filled out by the Director of Operations on the Trustee's behalf).

Expenses which do not directly relate to official business, or which have no direct benefit to the Board, including but not limited to entertainment expenses, shall be borne by the individual and not by MHB. Typically, car rentals should be restricted to compact or mid-size automobiles and airfares should be limited to coach class; exceptions should be justified in the procurement documents. Except for expenses where no receipt is generated (e.g., mileage on employees' cars, parking meters, etc.), receipts must be attached to procurement documents. The Employee Handbook shall specify the process for obtaining expense reimbursements, per diem advances and mileage reimbursements consistent with this policy.

After an MHB business trip, an employee that has incurred business-related expenses should complete an Expense Report in accordance with the following policies:

- Except for tips and reimbursed mileage, all business expenses must be supported with invoices/receipts. No receipt is required for public transit or parking expenses for which no supporting documentation is provided, but records of travel must be maintained.
- For all lodging and any expenditure other than meals, vendor receipts/invoices must be submitted. Credit card charge slips, alone, do not constitute adequate supporting documentation.
- For airfare, airline-issued receipts should be obtained. If a traveler fails to obtain a receipt, other evidence must be submitted indicating that a trip was taken, and the amount paid (for example, a combination of an itinerary, a credit card receipt, and boarding passes).
- Mileage will be reimbursed at rates pursuant to City policy
- The business purpose of each trip must be adequately explained on each report
- Project/function codes must be identified for all expenditures
- For all meals and other business entertainment, the purpose of the expenditure must be explained
- All expense reports must be signed and dated by the employee
- All expense reports must be approved by the employee's supervisor

An employee will not be reimbursed for expenses not meeting the procedure criteria.

B. Other Goods or Services

Staff shall obtain the written approval of the Executive Director on procurement documents (e.g., Purchase Request, Check Request, etc.) prior to making any purchase. Furthermore, MHB believes that competitive quotations are useful in making desired purchases at the most favorable terms available. The administrative cost for obtaining competitive quotations for each purchase necessary for the operation of the organization, however, would be unreasonable. Orders up to \$10,000 shall be purchased at the best price based on the professional judgment of the staff requesting the purchase.

Service contracts or supply/equipment orders of greater than \$10,000 but less than \$25,000 shall require written quotations from three different suppliers are attached to the procurement forms by staff.

Service contracts or supply/equipment orders of \$25,000 or more shall require competitive bidding (i.e., RFP or RFB).

All community investments are required to have a contract, agreement or when applicable an award letter in place. All contracts and agreements between MHB and outside parties must be reviewed and approved by the Executive Director. Certain contracts are required to be reviewed by legal counsel. In all cases, copies of signed contracts are to be forwarded to the Controller for audit purposes.

In accordance with the MHB policy on conflicts of interest, members of the Board of Trustees, as well as MHB staff, must indicate and sign that they have no Conflicts of Interest with any current vendor or funded entity on an annual basis. In addition, when new contracts are approved throughout the course of the year, Trustees and Staff are required to disclose any conflicts then, as well. See appended policy.

C. Credit Card Purchases

MHB understands that credit cards are a necessary tool of modern-day business. Credit cards, however, pose an additional level of risk for the organization because an individual holding such a card may circumvent the purchasing and disbursement policies by making an unauthorized purchase. Credit cards, therefore, shall be issued only to staff whose positions require them to make regular purchases on behalf of MHB, and authorized by the Executive Director. Personal expenditures are never to be purchased with an MHB credit card. Credit cards must be returned upon termination of employment. Both the issuance and return of the card shall be documented in the staff's personnel file.

Credit card purchases shall otherwise be subject to the same general procurement policy as any other purchase regarding preauthorization, receipts and documentation, etc. based on the nature of the purchase. The Executive Director shall be responsible for reviewing and approving purchases on staff credit cards prior to credit card payment.

The Accountant records credit card charges on an accrual basis as of the date of the transaction. Credit card balances shall be paid monthly and no balances may exceed the credit limit set by the credit card company. The Accountant reconciles the credit card on a monthly basis and the Controller reviews the monthly statement and reconciliation.

Current credit card holders: Executive Director, Deputy Director, Digital Manager and Director of Operations.

Internal Control Elements

- Employee business and travel expenses are reviewed and approved by the Executive Director or the Deputy Director (or supervisor) prior to reimbursement
- Receipts must be attached to procurement documents
- Car rentals are restricted to compact or mid-size automobiles; airfares are limited to coach class
- Staff are required to obtain and document competitive quotations for major purchases (\$1,000 or more)
- The Executive Director shall be responsible for reviewing and approving purchases on staff credit cards prior to credit card payment
- Credit card purchases shall otherwise be subject to the same general procurement policy as any other purchase

Cost Accounting (P & L by Class)

Cost accounting (using the Class system in QuickBooks) will ensure that MHB shall have a full understanding of both the cost and revenue associated with specific tasks, such as a Federal grant or tax fund. It further provides a basis for cost reporting for grants or contracts which reimburse MHB for expenses incurred, and therefore, maintain MHB's ability to draw down such funds.

For the purposes of this policy, the term "Class" is used to describe the primary cost centers of MHB (e.g., Tax funds, Federal grants, etc.) as implemented in QuickBooks.

When costs are directly related to a specific cost center, those costs shall be entirely allocated to that Class. For example, the Director of Operations shall employ monthly analysis of accounting codes for long distance charges.

When costs are incurred on behalf of multiple projects, MHB shall use methods consistent with U.S. Generally Accepted Accounting Principles to distribute those costs equitably among the cost centers. These methods shall include but not necessarily be limited to the following types of distributions:

A. Personnel Costs

Personnel costs that cannot be directly attributed to a single Class shall be allocated based on an annual analysis to determine the appropriate distribution for each individual. The allocation is maintained in a spreadsheet titled "FYXX Staff % Allocation Benefits Breakdown". For each person, a distribution shall be developed which shall uniformly be applied to all personnel costs for that employee. Examples of such costs shall include, but shall not necessarily be limited to, staff salaries, FICA and Medicare taxes, pension, health, disability and other insurance premiums.

Regarding external sources of funding with a specified salary amount determined, the amount of salaries and fringe that can be reimbursed is determined in the approved budget.

B. Staff-Associated Costs

Costs which cannot be directly charged to one cost center but are associated with specific staff shall be allocated across Classes according to the allocation used for that employee's personnel expenses. Examples of such costs shall include but not necessarily be limited to mileage expenses, out-of-town meals, etc.

C. Occupancy Costs

Occupancy costs that cannot be directly charged shall be allocated proportionally between Classes. Examples of such costs shall include but not necessarily be limited to rent, property insurance, etc.

D. General Operating Costs and Professional Fees

Office supplies that can be directly assigned to a specific Class or that are staff-associated costs shall be allocated in that manner. General operating costs, however, shall be allocated at year end at the administrative charge back rate. Professional and consultants' fees that are not directly related to a Class will be allocated to MHF Administration and CSF Administration proportionately at the administrative charge back rate at year end.

The Accountant shall be responsible for allocating costs between Classes. The Controller shall review the allocation on a quarterly basis to determine the appropriateness of the allocation.

Internal Control Elements

- The Controller, with the aid of the Executive Director as needed, reviews the cost allocation of expenses (personnel, occupancy, staff, supplies, and professional fees) on a quarterly basis to determine the appropriateness of the allocation

Payroll

An outside automated payroll service provider shall perform payroll processing bi-weekly; the payroll provider assumes responsibility for timely filing of payroll tax reports and direct deposit services and shall ensure compliance with all applicable regulations regarding payroll tax computation and deposits.

New hires, salary data, termination, deductions and any other employee activity shall be reported to the payroll service by the Controller. Changes in payroll information shall not be made without the approval of the Executive Director. Documentation of all changes in payroll data shall be maintained in each employee's personnel file. Employees shall be required to receive their paychecks through direct deposit.

Payroll reports received from the payroll service provider shall be compared to the monthly bank statements and used to post payroll to the general ledger. The information shall be coded by Account and Class and input into QuickBooks by the Accountant. The Controller reviews the related payroll journal entries recorded by the Accountant. The Executive Director shall review payroll data on a bi-weekly basis to assess reasonableness.

Direct deposit stubs are distributed to employees on the bi-weekly pay dates by the Controller.

Internal Control Elements

- Payroll is not processed on site, but via direct deposit by a payroll service provider
- Changes in payroll information require the Executive Director's approval
- Payroll reports are compared to payroll line items on the monthly bank statement
- The Controller reviews payroll journal entries recorded by the Accountant
- The Executive Director reviews the payroll reports on bi-weekly basis

Timesheets

The payroll processor does not maintain, or track vacation pay, sick pay or personal time. Vacation pay, sick pay and personal time are reported in the bi-weekly timesheets submitted by each employee and approved by the Executive Director, Deputy Director, or Supervisors, respectively, based on their direct reports.

To determine the accuracy of the computation of the timesheets, the Controller reviews the yearly computation within the master timesheet workbook for mathematical accuracy prior to the start of the fiscal year. Once validated, the Director of Operations enters and locks prior year accruals for sick and vacation time and adds current year personal time. The Controller reviews and approves the accrual balances and the Director of Operations finalizes the timesheet for regular use by the employees.

For each completed pay period, staff must enter all time by 12:00 PM the Monday following the conclusion of the pay period and email their supervisor to indicate that their timesheet is completed and ready for approval. The supervisor or their designee will notify staff of any issues requiring resolution or that the timesheet was approved as submitted by the end of day Tuesday following the end of the pay period. Staff

should endeavor to complete and submit timesheets in advance if they have a planned absence on the Monday that timesheets are due. For unplanned absences, staff will contact the supervisor via phone or email with remaining information so that the supervisor or his/her designee can complete the timesheet and approve.

On a bi-weekly basis, the Director of Operations compiles all reviewed and approved timesheets and summarizes the information in a Timesheet Management Report that is provided to the Executive Director, Deputy Director and Controller via email. On a quarterly basis, the Accountant uses the quarter-end Timesheet Management Report to prepare accrual adjustments for vacation time. The Controller reviews the accruals on a quarterly basis.

Internal Control Elements

- Timesheets must be approved by the Executive Director or Deputy Director
- Accountant makes quarterly accrual adjustments reviewed by the Controller
- Controller reviews yearly computation in the master timesheet workbook

PROMULGATED: January 17, 2002

UPDATED: September 1, 2018, August 30, 2021, November 18, 2021

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES

INVESTMENT POLICY

I. SCOPE

This policy applies to the investment of excess operating or longer-term reserve funds of the St. Louis Mental Health Board.

1. Pooling of Funds

Except for certain restricted and special funds, the City of St. Louis Mental Health Board will consolidate cash balances from all funds to maximize investment earnings. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

2. External Management of Funds

Investment through external programs, facilities and professionals operating in a manner consistent with this policy will constitute compliance.

II. GENERAL OBJECTIVE

The primary objectives, in priority order of investment activities; shall be safety, liquidity and yield.

1. Safety

Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit risk and interest rate risk.

a. Credit Risk

The City of St. Louis Mental Health Board will minimize credit risk, the risk of loss due to the failure of the security issuer or backer, by:

- i. Pre-qualifying the financial institutions, brokers/dealers, intermediaries, and advisors with which the City of St. Louis Mental Health Board will do business
- ii. Diversifying the portfolio so that potential losses on individual securities will be minimized

b. Interest Rate Risk

The City of St. Louis Mental Health Board will minimize the risk that the market value of securities in the portfolio will fall due to changes in general interest rates by:

- i. Structuring the investment portfolio so that securities mature to meet cash requirements for ongoing operations, thereby avoiding the need to sell securities on the open market prior to maturity

ii. Investing operating funds primarily in shorter-term securities

2. Liquidity

The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This is accomplished by structuring the portfolio so that securities mature concurrent with cash needs to meet anticipated demands (static liquidity). Furthermore, since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets (dynamic liquidity). A portion of the portfolio also may be placed in bank deposits or repurchase agreements that offer same-day liquidity for short-term funds.

3. Yield

The investment portfolio shall be designed with the objectives of attaining a market rate of return throughout budgetary and economic cycles, considering the investment risk constraints and liquidity needs. Return on investment is of secondary importance to the safety and liquidity objectives described above. The core of investments is limited to relatively minimal risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall not be sold prior to maturity with the following exceptions:

- a. A security with declining credit may be sold early to minimize loss of principal.
- b. A security swap would improve the quality, yield, or target duration in the portfolio.
- c. Liquidity needs of the portfolio require that the security be sold.

III. STANDARDS OF CARE

1. Prudence

The standard of prudence to be used by investment officials shall be the “prudent person” standard and shall be applied in the context of managing an overall portfolio. Investment officers acting in accordance with written procedures and this investment policy and exercising due diligence shall be relieved of personal responsibility for an individual security’s credit risk or market price changes provided deviations from expectations are reported in a timely fashion to the governing body and the liquidity and the sale of securities are carried out in accordance with the terms of this policy.

Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probable income to be derived.

2. Ethics and Conflicts of Interest

Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material interests in financial institutions in which they conduct business. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with which business is conducted on behalf of the City of St. Louis Mental Health Board.

3. Delegation of Authority

Authority to manage the investment program is granted to the Executive Director, (hereinafter referred to as investment officer), by resolution of the Board of Trustees and under the direction of the Investment Committee, duly appointed by the Chair of the Board of Trustees. Responsibility for the operation of the investment program is hereby delegated to the investment officer, who shall act in accordance with the established written procedures and internal controls for the operation of the investment program consistent with this investment policy. Procedures should include references to safekeeping, delivery vs. payment, investment accounting, repurchase agreements, wire transfer agreements, and collateral/depository agreements. No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the investment officer. The investment officer shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials.

IV. INVESTMENT TRANSACTIONS

1. Authorized Financial Dealers and Institutions

A list will be maintained of financial institutions authorized to provide investment transactions. In addition, a list also will be maintained of approved security brokers/dealers selected by creditworthiness as determined by the investment officer and approved by the governing body. These may include “primary” dealers or regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capital rule).

All financial institutions and brokers/dealers who desire to become qualified for investment transactions must supply the following, as appropriate:

- a. Audited financial statements
- b. Proof of Financial Industry Regulatory Authority (FINRA)
- c. Proof of state registration
- d. Completed broker/dealer questionnaire
- e. Certification of having read, understood and agreeing to comply with the City of St. Louis Mental Health Board’s investment policy

An annual review of the financial condition and registration of qualified financial institutions and brokers/dealers will be conducted by the investment officer.

From time to time, the investment officer may choose to invest in instruments offered by emerging or

minority firms and community financial institutions. In such situations, a waiver to the criteria under Paragraph 1 may be granted by the governing body. All terms and relationships will be fully disclosed prior to purchase and will be reported to the governing body of the City of St. Louis Mental Health Board on a consistent basis. The governing body of the City of St. Louis Mental Health Board should approve these types of investment purchases in advance.

2. Internal Controls

The investment officer, under the direction of the Investment Committee, is responsible for establishing and maintaining an internal control structure that will be reviewed annually with the City of St. Louis Mental Health Board's independent auditor, in conjunction with the annual audit. The internal control structure shall be designed to ensure that the assets of the City of St. Louis Mental Health Board are protected from loss, theft or misuse and to provide reasonable assurance that these objectives are met.

The concept of reasonable assurance recognizes that (1) the cost of control should not exceed the benefits likely to be derived and (2) the valuation of costs and benefits require estimates and judgments by management.

The internal controls shall address the following points:

- a. Control of collusion
- b. Separation of transaction authority from accounting and record keeping
- c. Custodial safekeeping
- d. Avoidance of physical delivery securities
- e. Clear delegation of authority to subordinate staff members
- f. Written confirmation of transactions for investments and wire transfers
- g. Development of a wire transfer agreement with the lead bank and third party custodian

3. Delivery vs. Payment

All trades where applicable will be executed by delivery vs. payment (DVP) to ensure that securities are deposited in eligible financial institutions prior to the release of funds. All securities shall be perfected in the name of the City of St. Louis Mental Health Board and shall be held by a third-party custodian as evidenced by safekeeping receipts.

V. SUITABLE AND AUTHORIZED INVESTMENTS

1. Investment Types

In accordance with and subject to restrictions imposed by current statutes, the following list represents the entire range of investments that the City of St. Louis Mental Health Board will consider, and which shall be authorized for the investment of funds by the City of St. Louis Mental Health Board.

- a. United States Treasury Securities The City of St. Louis Mental Health Board may invest in obligations of the United States government for which the full faith and credit of the United States are pledged for the payment of principal interest.
- b. United States Agency Securities The City of St. Louis Mental Health Board may invest in obligations issued or guaranteed by any agency of the United States government as described in V. (2)
- c. Repurchase Agreements The City of St. Louis Mental Health Board may invest in contractual agreements between the City of St. Louis Mental Health Board and commercial banks or primary government securities dealers. The purchaser in a repurchase agreement (repo) enters into a contractual agreement to purchase U.S. Treasury and government agency securities while simultaneously agreeing to resell the securities at predetermined dates and prices.
- d. Collateralize Public Deposits (Certificates of Deposit). Instruments issued by financial institutions which state that specified sums have been deposited for specified periods of time and at specified rates of interest. The certificates of deposit are required to be backed by acceptable collateral securities as dictated by State statute.
- e. Banker's Acceptance Time drafts drawn on and accepted by a commercial bank, otherwise known as bankers' acceptances. The City of St. Louis Mental Health Board may invest in bankers' acceptances issued by domestic commercial banks possessing the highest rating issued by Moody's Investor Services, Inc. or Standard and Poor's Corporation.
- f. Commercial Paper The City of St. Louis Mental Health Board may invest in commercial paper issued by domestic corporations, which has received the highest rating issued by Moody's Investor Services, Inc. or Standard and Poor's Corporation. Eligible paper is further limited to issuing corporations that have total assets in excess of five hundred million dollars (\$500,000,000).
- g. CDARS The City of St. Louis Mental Health Board may participate in the Certificate of Deposit Accounts Registry Service (CDARS) program providing it meets the requirements of 67.085 RSMo. which requires separate 100% deposit insurance provided by Federal deposit insurance. Funds may be deposited only in participating banks, which acts as custodian with respect to certificates of deposit.
- h. Funds that invest solely in investments in categories a. & b. above.

2. Security Selection

The following list represents the range of United States Agency Securities that City of St. Louis Mental Health Board will consider, and which shall be authorized for the investment of funds by the City of St. Louis Mental Health Board. Additionally, the following definitions and guidelines should be used in purchasing the instruments:

- a. U.S. Govt. Agency Coupon and Zero-Coupon Securities Bullet coupon bonds with no embedded options.
- b. U.S. Govt. Agency Discount Notes Purchased at a discount with maximum maturities of one (1) year.
- c. U.S. Govt. Agency Callable Securities Restricted to securities callable at par only with final maturities of five (5) years.
- d. U.S. Govt. Agency Step-Up Securities The coupon rate is fixed for an initial term. At coupon date, the coupon rate rises to a new, higher fixed term. Restricted to securities with final maturities of five (5) years.
- e. U.S. Govt. Agency Floating Rate Securities The coupon rate floats off one index. Restricted to coupons with no interim caps that reset at least quarterly.
- f. U.S. Govt. Mortgage-Backed Securities Restricted to securities with final maturities of five (5) years.

3. Investment Restrictions and Prohibited Transactions

To provide for the safety and liquidity of the City of St. Louis Mental Health Board's funds, the investment portfolio will be subject to the following restrictions:

- a. Borrowing for investment purposes ("Leverage") is prohibited
- b. Instruments known as Structured Notes (e.g., inverse floaters, leveraged floaters, and equity-linked securities) are not permitted. Investment in any instrument which is commonly considered a "derivative" investment (e.g., options, futures, swaps, caps, floors, and collars), is prohibited
- c. Contracting to sell securities not yet acquired in order to purchase other securities for purposes of speculating on developments or trends in the market is prohibited
- d. No more than 5% of the total market value of the portfolio may be invested in bankers' acceptances issued by any one commercial bank and no more than 5% of the total market value of the portfolio may be invested in commercial paper of any one issuer

4. Collateralization

Collateralization will be required on two types of investments: certificates of deposit and repurchase agreements. The market value (including accrued interest) of the collateral should be at least 100%.

For certificates of deposit, the market value of collateral must be at least 100% or the greater of the number of certificates of deposits plus demand deposits with the depository, less the amounts, if any, which is insured by the Federal Deposit Insurance Corporation, or the National Credit Unions Share

Insurance Fund.

All securities, which serve as collateral against the deposits of a depository institution must be safekept at a non-affiliated custodial facility. Depository institutions pledging collateral against deposits must, in conjunction with the custodial agent, furnish the necessary custodial receipts within five business days from the settlement date.

The City of St. Louis Mental Health Board shall have a depository contract and pledge agreement with each safekeeping bank that will comply with the Financial Institutions, Reform, Recovery, and Enforcement Act of 1989 (FIRREA). This will ensure that the City of St. Louis Mental Health Board's security interest in collateral pledge to secure deposits is enforceable against the receiver of a failed financial institution.

5. Repurchase Agreements

The securities for which repurchase agreements will be transacted will be limited to Treasury and government agency securities that are eligible to be delivered via the Federal Reserve's Fedwire book entry system. Securities will be delivered to the City of St. Louis Mental Health Board's designated Custodial Agent. Funds and securities will be transferred on a delivery vs. payment basis.

VI. INVESTMENT PARAMETERS

1. Diversification

The investments shall be diversified to minimize the risk of loss resulting from over concentration of assets in specific maturity, specific issuer, or specific class of securities. Diversification strategies shall be established and periodically reviewed. Diversification standards by security type and issuer shall be:

- a. U.S. treasuries and securities having principal and/or interest guaranteed by the U.S. Government.....100%
- b. Collateralized time and demand deposits.....100%
- c. U.S. Government agencies, and government sponsored enterprises no more than 60%
- d. Collateralized repurchase agreements.....50%
- e. U.S. Government agency callable securities.....no more than 30%
- f. Commercial Paper.....no more than 30%
- g. Bankers' Acceptances.....no more than 30%

2. Maximum Maturities

To the extent possible, the City of St. Louis Mental Health Board shall attempt to match its investments with anticipated cash flow requirements. Investments in bankers' acceptances and commercial paper shall mature and become payable not more than one hundred eighty (180) days from the date of purchase. All other investments shall mature and become payable not more than five (5) years from the date of purchase. The City of St. Louis Mental Health Board shall adopt weighted average maturity limitations that should not exceed three (3) years and is consistent with the investment objectives.

Because of inherent difficulties in accurately forecasting cash flow requirements, a portion of the portfolio should be continuously invested in readily available funds such as in bank deposits or overnight repurchase agreements to ensure that appropriate liquidity is maintained to meet ongoing obligations.

VII. REPORTING

1. Methods

The investment managers shall prepare an investment report annually, including a management summary that provides an analysis of the status of the current investment portfolio and transactions made over the last quarter. This management summary will be prepared in a manner that will allow the City of St. Louis Mental Health Board to ascertain whether investment activities during the reporting period have conformed to the investment policy. The report should be provided to the MHB Finance/Investment Committee who will then summarize to the governing body of the City of St. Louis Mental Health Board. The report will include the following:

- a. Listing of individual securities held at the end of the reporting period.
- b. Realized and unrealized gains or losses resulting from appreciation or depreciation by listing the cost and market value of securities over one- year duration (in accordance with Government Accounting Standards Board (GASB) 31 requirements). (Note, this is only required annually)
- c. Average weighted yield to maturity of portfolio on investments as compared to applicable benchmarks.
- d. Listing of investment by maturity date.
- e. Percentage of the total portfolio which each type of investment represents.

2. Performance Standards

The investment portfolio will be managed in accordance with the parameters specified within this policy. The portfolio should obtain a market average rate of return during a market/economic environment of stable interest rates. A series of appropriate benchmarks shall be established against which portfolio performance shall be compared on a regular basis.

Commercial paper and bankers' acceptances must be reviewed monthly to determine if the rating level has changed: The commercial paper and bankers' acceptances should be reviewed for possible sale if the securities are downgraded below the minimum acceptable rating levels.

3. Marking to Market

The market value of the portfolio shall be calculated at least quarterly and a statement of the market value of the portfolio shall be issued at least annually to the governing body of the City of St. Louis Mental Health Board. This will ensure that review of the investment portfolio, in terms of value and price volatility, has been performed.

VIII. POLICY CONSIDERATION

1. Exemption

Any investment currently held prior to the adoption of this policy that does not meet the guidelines of this policy shall be exempt from the requirements of this policy. At maturity or liquidation, such monies shall be reinvested only as provided by this policy.

2. Adoption

This policy shall be adopted by resolution of the City of St. Louis Mental Health Board's governing body. The policy shall be reviewed annually by the Finance/Investment Committee and recommended changes will be presented to the governing body for consideration.

Revised May 2010

Appendix B: Vacation

Regular full-time employees will accrue vacation time based on the number of years of continuous employment with MHB. Part-time employees will accrue on a pro rata basis. New employees accrue vacation time after the first month of employment but may not take accrued paid vacation until they complete six months of continuous employment. Vacation days earned will not be paid upon termination during the first six months of employment.

Vacation time accrues as follows:

Years of Service	Accrual Rate Per Month	Annual Equivalent
1-5 years	9.375 hours	15 days
6-9 years	12.50 hours	20 days
10 + years	15.625 hours	25 days

Paid vacation time can be used in half hour increments. To take vacation employees should request advance approval in writing from his/her direct supervisor. Simply noting vacation time in the shared calendar is not considered "advance approval," however, once approval is obtained, vacation dates should be entered in the shared calendar.

Approval of all vacation requests is at the discretion of your supervisor, based on the business needs of MHB. Vacation requests of five days or more must be approved by your supervisor and submitted at least two weeks in advance of the proposed vacation. Requests will be considered based upon a combination of factors including but not limited to the timing of the request, business needs and staffing requirements. To satisfy staff preferences, as well as to meet the staffing needs of MHB, vacation dates should be requested as far in advance as possible.

Vacation is intended to be taken annually for rest, relaxation, and personal pursuits. All employees hired after March 1, 2016, will be allowed to rollover a total of 10 days' vacation per fiscal year. For all employees hired prior to March 1, 2016, vacation days not used may be accumulated to a maximum of 30 days. Upon termination of employment, Regular Employees will be paid for unused vacation time that has been earned through the last day of work.

ST. LOUIS MENTAL HEALTH BOARD

EMPLOYEE DISCLOSURE OF CONFLICT OF INTEREST

Section 7.1 of the MHB Contract with funded agencies states:

Conflict of Interest *In accordance with all applicable provisions of the laws of the State of Missouri, no official or employee of the MHB who exercises any functions or responsibilities in the review or approval of the undertaking or carrying out of the Scope of Work as described in Attachment A shall voluntarily acquire any personal interest, directly or indirectly, in the contract.*

7.3 *It is expressly agreed that no officer or employee of the MHB has helped the Contractor obtain this contract or shall participate in the Contractor's performance of this contract, if such involvement will constitute a conflict of interest in violation of local ordinances or state and/or federal laws and regulations, or regulations and policies of the MHB. Before any employee of the MHB may be involved in the performance of this contract on behalf of the Contractor, approval must be obtained in advance from the executive director of the MHB. Under no circumstances shall an employee of the MHB be compensated under this contract for duties performed in the course of his/her employment with the MHB. Under no circumstances shall an employee of the MHB use MHB facilities or materials for personal gain relating to the performance of this contract.*

As employees of a governmental entity, MHB employees, in the conduct of their public duties, are subject to federal, state laws and city ordinances regulating conflict of interest. MHB is ultimately dependent on public trust. It is critical that stakeholders view MHB employees as impartial and neutral when reviewing and recommending grant applications and monitoring performance. It is therefore important that employees of the St. Louis Mental Health Board avoid any appearance of conflict of interest in the exercise of their public duties.

In order to maintain public trust in MHB's grant making process and to assist employees to avoid the possibility of serious legal consequences, employees must disclose any conflict of interest.

Conflict of Interest – *A conflict occurs when a public employee, who has an interest in a particular matter, takes some official action that has a direct and predictable effect on that interest.*

Official actions of the employee that affect the interests of persons with a relationship to the employee, such as spouse, children or parents, may also trigger a conflict of interest.

A conflict of interest clearly occurs when an employee or a relative of the employee receives financial benefit or services from an agency under contract with MHB or seeks a contract with MHB and that employee is in a position to influence decisions concerning that contract. The value of the monetary benefit or services received, in this context, is of less concern than the influence that may be exercised on the awarding of a grant.

Examples of conflict are accepting services provided by the organization, with or without the payment of a fee to the organization or gifts, including tickets to sporting or cultural events, meals at expensive restaurants or private clubs. On the other hand, food or beverages provided for meeting participants, attendance at agency-sponsored events open to a broad audience and acceptance of token gifts, such as pens, key chains and mouse pads do not necessarily, and likely do not, create a conflict of interest. Generally, employees should not accept free tickets to fund raising galas, unless MHB is being honored or is an event sponsor and complementary tickets are included with the sponsorship.

A conflict of interest also exists when an employee accepts a policymaking, administrative or consulting position with an agency under contract with MHB, or one seeking a contract with MHB, whether those responsibilities are compensated or not compensated. Employees are prohibited from providing training or

technical assistance on the preparation of MHB applications for funding, other than those made available to all applicants in the MHB office.

Appearance of Conflict – *An appearance of conflict exists when a reasonable person will conclude from the circumstances that the employee's ability to act with impartiality is compromised.*

An MHB employee shall make every reasonable effort to avoid even the appearance of a conflict of interest. Appearance of conflict may occur without the employee's knowledge but is sufficiently apparent to others who may call into question that employee's ability to act with impartiality. Situations which may impart the appearance of conflict can occur when employees volunteer for funded agencies, promote fundraising events of funded agencies, become overly familiar with key staff of funded agencies, and socialize after hours. Likewise, overtly laudatory or pejorative public commentaries about a funded agency's performance should be avoided.

The appearance of conflict of interest may also occur when employees express strong opinions, positive or negative, acquired apart from MHB's experiences with particular organizations.

Disclosure Required: An employee shall disclose to the Executive Director any situation in which the employee has a real or potential conflict of interest or the appearance of a conflict of interest as soon as it becomes apparent. The Executive Director, in consultation with the Board Counsel shall determine an appropriate way to manage the conflict (whether real, potential, or the appearance of), and assure that MHB business is not improperly influenced or adversely affected. If there is no reasonable way to manage, i.e., withdraw from the conflict, then the employee may be prohibited from participating in related activities or may be reassigned to other activities.

Procedure for Disclosure: An employee shall disclose conflicts of interest (whether real, potential or the appearance of conflict) in writing, and shall include a brief statement of the nature and extent of the conflict or the circumstances leading to the conclusion that there is the appearance of a conflict. The Executive Director shall evaluate the situation, in consultation with the Board Counsel, if necessary, and advise the employee what action will be taken, if any. In the event the Executive Director determines that an employee has a real conflict of interest, the Executive Director shall promptly inform the Personnel Committee, in Executive Session, of the circumstances of the situation and action that has been taken.

Remaining free of conflict of interest and disclosing it as soon as one becomes aware of it, is a pillar of ethical public service. Failure of any MHB employee to disclose actual or appearance of conflict is a breach in ethical behavior which may harm the entire organization by jeopardizing its reputation and future stability. Such breaches subject the employee to appropriate disciplinary action, up to and including termination.

APPROVED THIS 27TH DAY OF JANUARY 2016

I have received a copy of the MHB Employee Conflict of Interest Policy, have read and understand it and agree to comply with it.

I am aware of the following conflict of interest, potential conflict or appearance of conflict:

Employee Signature

Date Submitted

Employee Name (Please Print)

MHB STAFF

Staff Contact Information (As of August 1, 2022)

Name	Position	Neighborhood	Email	Phone	Department(s)
Cassandra Kaufman	Executive Director	Holly Hills	ckaufman@stlmhb.com	314.535.6964 x 17	Program & Operations
Serena Muhammad	Deputy Director	Jennings, MO	smuhammad@stlmhb.com	314.535.6964 x 14	Program
Denise Carter	Grants Administrator	Visitation Park	dcarter@stlmhb.com	314.535.6964 x 27	Operations
Sue Culli	Digital Director	House Springs, MO	sculli@stlmhb.com	314.535.6964 x 11	Operations
Zenique Gardner-Perry	St. Louis Area VPC Project Director	Tower Grove South	zgardnerperry@stlmhb.com zgardnerperry@stlareavpc.org	314.535.6964 x 16	Program
Dave Haasis	Director of Clinical Partnerships	Oakville, MO	dhaasis@stlmhb.com	314.535.6964 x 21	Program
Susan Kabat	Controller	Princeton Heights	skabat@stlmhb.com	314.535.6964 x 20	Operations
Jessica Meyers	St. Louis Area VPC Director	Fairview Heights, IL	jmeyers@stlmhb.com jmeyers@stlareavpc.org	314.535.6964 x 18	Program
Lisa Potts	Director of Prevention Partnerships	West End	lpotts@stlmhb.com	314.535.6964 x 15	Program
Katie Zitt	Senior Accountant	Union, MO	kzitt@stlmhb.com katie@katiezitt.com	314.535.6964 x 13	Operations

Staff Biographical Summaries



*Cassandra Kaufman, MSW
Executive Director*

Cassandra joined the MHB team in 2013 as Deputy Director, overseeing MHB's strategic investment of the Community Mental Health and Community Children's Services Funds, as well as MHB's funding partnerships and initiatives. In July 2021, Cassandra became MHB's Executive Director. She brings more than 30 years of experience in nonprofit management and leadership in health and human services, having served as a Vice President at the United Way of Greater St. Louis, prior to joining the MHB team. Cassandra continues her community involvement as an active member of several advisory boards and committees. She was recognized in 2015 by the University of Missouri – St. Louis as a Distinguished Alumnae, the university's highest recognition of its graduates. She holds a BA in

Communications from the University of Illinois at Urbana-Champaign, as well as an MSW and Graduate Certificate in Nonprofit Management and Leadership from the University of Missouri—St. Louis.



Serena Muhammad, MFA, MPPA
Deputy Director

Serena joined MHB in 2013 as a Senior Project Director responsible for federal grant management. She transitioned into the role of Director of Strategic Initiatives responsible for regional and state-wide initiatives that focus on alleviating the social, educational, and health inequities that keep people and places from reaching their full potential. Her 2020-2021 appointment as the Managing Director of the COVID-19 Regional Response Team, allowed her to lend her expertise in system building to strengthen the crisis response infrastructure in the St. Louis region. Serena staffs the St. Louis Area Violence Prevention Commission and is active in several criminal justice reform efforts. She also provides oversight to the System of Care St. Louis, a federally funded initiative to improve access to behavioral health services for children with serious emotional disturbance and their families. In 2021, Serena became MHB's new Deputy Director. In addition to her collaborative work, Serena Chairs the City of St. Louis Board of Health and Hospitals and is the Founding Board Chair of Build Missouri Health – an affiliated nonprofit of the Missouri Foundation for Health. Serena received her B.A in English from Xavier University in Louisiana and her M.P.P.A. and M.F.A. from the University of Missouri – St. Louis.



Denise Carter, MBA
Grants Administrator

Denise has over 25 years of experience in the non-profit sector with experience in the mental health and early childhood field including managerial roles, oversight of programs, fund development responsibilities, and human resource duties. Denise graduated with a MBA from Webster University, a B.S. from Xavier University of New Orleans, Certificates of Proficiency and Specialization from St. Louis Community College and an Associate Degree in Applied Science from St. Louis Community College. She is a Professional Development Specialist and holds Child Development Associate Certificates in both Infant and Toddler and Preschool from the Center for Professional Recognition.



Sue Culli, BS
Digital Director

Sue joined MHB in September of 2006. She is a graduate of the University of Missouri – Columbia with a bachelor's degree in business and marketing. Sue's diverse background prepared her for the many hats she wears at MHB including managing the Salesforce system, social media, website administrator, liaison with outside vendors and internal technical support.



Zenique Gardner Perry, MFA
St. Louis Area Violence Prevention Commission Project Director

Zenique, who was raised in the St. Louis region, is a writer, educator and community organizer who has worked to create safe and supportive spaces for St. Louis youth. She is the former Prevention Education Manager of Safe Connections and, before returning to Missouri in 2015, worked as a Community Organizer with The Urban League of Philadelphia and The National Foundation for Reproductive Health Association. In 2018, Zenique co-founded Undo Bias, a consulting group that accompanies organizations in their efforts towards building racial equity in their workspaces. Zenique also brings to this work her personal experience of accompanying a loved one through the juvenile justice system and losing two other young family members to gun violence. These experiences are what her hopes and plans for this new role with VPC are hinged upon. Zenique is a recent graduate of Washington University's MFA program and she holds a Bachelors in English from Eastern University in Pennsylvania. In addition to her youth advocacy and antiracism work, Zenique is a writer whose work centers on race, family and faith and sometimes pushes a social justice agenda.



Dave Haasis, MSW, MBA
Director of Clinical Partnerships

Dave has more than 20 years working as a social worker in the St. Louis Community area. Most of his career has been working in the Behavioral health field. He has had the opportunity to gain perspective on mental health issues from many different populations over the years through outreach and working as an individual therapist. In his last job he was the Integrated Health Manager and developed a team of Behavioral Health Consultants, Community Health Workers and Crisis Workers that helped support individuals with Mental Health issues in a Primary Care Setting. Dave loves to help develop ideas that will make an impact on the individual and community. He has an MSW from St. Louis University and an MBA from Webster University. Dave is married and has two daughters 12 and 6. His family loves to take vacations and explore new things. He destresses by taking long runs and shooting hoops any chance that he gets.



Susan Kabat, BS, CPA
Controller

Susan joined MHB in April 2018. In her role of Controller Susan serves the MHB Trustees and Finance Committee with performing budgeting and financial planning, financial reporting, and the creation and monitoring of internal controls and accounting policies. Prior to MHB, Susan spent 12 years with a public accounting firm managing a team and specializing in not-for-profit organizations.



Jessica Meyers, MPA
St. Louis Area Violence Prevention Commission Director

Jessica joined MHB as the project director for the Violence Prevention Commission (VPC) in 2018. Prior to her work at VPC, she did direct services with victims of violence, predominantly homicide victims' families, for 14 years at Crime Victim Center. Jessica holds a Master of Public Administration from Saint Louis University. She is a doctoral candidate in Public Policy Analysis at SLU. Her research areas include police legitimacy, community cooperation with law enforcement investigations, and hate/bias crimes.



Lisa Potts, MPA
Director of Prevention Partnerships

Lisa joined us in 2018 and is currently the Director of Prevention Partnerships for MHB. She manages a portfolio of 23 projects who have the collective mission to improve the quality of life for city residents by providing a coordinated system of social and behavioral services to build an equitable, thriving community. Lisa has a vast background in community organizing, violence prevention, and neighborhood stabilization so she is also on loan to St. Louis Area Violence Prevention Commission, where she leads a new initiative Handle with Care – a response system for children exposed to violence. Lisa also serves on the Adult Services Advisory Board for the Behavioral Health Network and provides backbone support for the Clergy Advisory Board for the City of St. Louis – recognized by the CDC as the first interfaith collaborative designed to bring a unified message addressing health disparities among marginalized communities. Lisa is a graduate of the Neighborhood Leadership Academy and Neighborhood Leadership Fellows Program at UMSL.



Katie Zitt, BA, CPA
Senior Accountant

Katie began working with MHB in July 2016. In her role as Accountant, Katie is responsible for general ledger maintenance and supporting the Controller with financial activities and reporting. Katie is a CPA and an Advanced Certified QuickBooks Online ProAdvisor. She has 14 years of experience working with nonprofit and for-profit organizations providing audit, tax, payroll, QuickBooks consulting, QuickBooks training and general bookkeeping services.



SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Accountant**

Department: **Operations**

FLSA Status: **Exempt**

Status: **Full-Time**

Reports to: **Controller**

Revision Date: **November 2022**

POSITION SUMMARY:

The Accountant supports the enterprise-wide financial affairs of the Saint Louis MHB to facilitate the attainment of MHB's strategic goals. At the direction of the Controller this position also provides accounting support for the City of St. Louis Senior Citizen's Fund. Additionally at the direction of the Controller, the Accountant provides accounting support to the St. Louis Area Violence Prevention Commission for which Saint Louis MHB serves as the backbone organization and fiscal agent.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes
 - Supports the development and preparation of the annual organizational budget under the oversight of the Controller
2. Accounting & Finance
 - Performs accounting functions including, but not limited to managing the general ledger, processing cash receipts, analyzing account information, reconciling accounts, calculating depreciation and accruals, maintaining database of fixed assets, maintaining annual journal entry files, ensuring timely payment of vendor invoices, and preparing monthly invoices for any contracted work
 - Prepares monthly, quarterly, and annual financial reports or statements and program specific reports on a monthly basis at the direction of the Controller
 - Maintains supporting schedules for allocations related to payroll, health, dental/vision, and disability/life insurance
 - Performs annual reports and updates supporting the payroll function
 - Monitors spending on contracts utilizing accounting software
 - Assists with monthly, quarterly, and year-end closings; preparation of the annual audit; and preparation of 1099's
 - Participates in the development of finance-related policies and procedures
 - Enters billing into accounting system for monthly payments to funded partners and vendors as appropriate

- Assists with accounts payable and reconciliations related to Community Investments

3. Other duties as assigned by management

QUALIFICATIONS:

1. Bachelor's degree in accounting, business administration, or related field preferred or 4 years' experience in bookkeeping, accounting, and auditing in a business, corporate, government, or non-profit setting.
2. Working knowledge of General Accounting Standards
3. Knowledge of fund accounting for grant tracking and restricted third-party funding preferred
4. Proficient in Microsoft Office and finance/accounting software. Preference for proficiency in QuickBooks.
5. Exceptional written and verbal communication skills
6. History of working cooperatively and effectively with agency personnel
7. Commitment to health equity and racial justice
8. Objective decision maker that does not include personal preference or bias in decisions
9. Excellent judgment and ability to handle confidential information
10. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Children's Services Project Director**

Department: **Program**

FLSA Status: **Exempt**

Status: **Full-Time**

Reports to: **Deputy Director**

Revision Date: **November 2022**

POSITION SUMMARY:

The Children's Services Project Director manages community investments related to early childhood, out-of-school-time, and other children's services programming to facilitate the attainment of MHB's strategic goals.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes
2. Community Leadership and Involvement
 - Develops trusting collaborative relationships with community coalitions, funded partners, city residents, and other funders
3. Program Management
 - Maintains up-to-date knowledge base of emerging issues related to early childhood, out-of-school time, and children's services in the communities served by Saint Louis MHB
 - Oversees MHB's portfolio of early childhood, out-of-school time, and other children's services projects as assigned by the Deputy Director
 - Provides community outreach/education about available funding and training for MHB applicants and grantees on the grantmaking process and outcome-based funding
 - Provides application support for MHB applicants and funded partners
 - Ensures all CCSF grantees' activities are monitored and reports any performance, financial management, or contract compliance issues to the Deputy Director
 - Provides capacity building support to applicants, funded partners, and grassroots organizations through connection to resources and tools intended to help improve and/or expand services
 - Engages in community groups and internal MHB activities which focus on building trust, transparency, and reducing the administrative burden for funded organizations, while working to change the culture of grantmaking from transactional to transformational
 - Identifies and addresses internal and external health equity and racial justice system inequities and works to foster systems change in community investment and grant making
4. Other duties as assigned by management

QUALIFICATIONS:

1. Master's degree in early childhood, social work, public administration, public health, psychology, counseling, or related field plus at least 4 years' experience in a non-profit or government setting
2. Knowledge of human services delivery systems, grant making, and contracting processes
3. History of working cooperatively and effectively with public officials and agency personnel
4. Exceptional written and verbal communication skills
5. Proficient in MS Office and various other platforms
6. Commitment to health equity and racial justice
7. Objective decision maker that does not include personal preference or bias in decisions
8. Excellent judgment and ability to handle confidential information
9. Valid driver's license
10. Reliable transportation allowing travel between locations when required
11. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Controller**
FLSA Status: **Exempt**

Department: **Operations**
Status: **Full-Time**

Reports to: **Executive Director**

Revision Date: **November 2022**

POSITION SUMMARY:

The Controller administers the enterprise-wide financial affairs of the Saint Louis MHB to facilitate the attainment of MHB's strategic goals. This position also serves as the Controller for the City of St. Louis Senior Citizen's Fund through an administrative agreement. Additionally, the Controller oversees the financial affairs of the St. Louis Violence Prevention Commission for which Saint Louis MHB serves as the backbone organization and fiscal sponsor.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes
 - Oversees the development and preparation of the annual organizational budget in consultation with the Executive Director and the Finance--Investment Committee for approval by the Board of Trustees
2. Management
 - The Senior Accountant and Accountant report directly to this position
 - Recruits, interviews, and recommends potential candidates to the Executive Director
 - Trains and manages staff activities and workflow, while providing individualized, ongoing support and mentoring for direct reports
 - Prepares annual performance evaluation for each direct report and submits to the Executive Director for review and approval
3. Accounting & Finance
 - Oversees overall management of enterprise-wide organizational finances
 - Oversees the implementation of the annual organizational budget with guidance from the Finance--Investment Committee and Executive Director and support from the Senior Accountant and Accountant
 - Develops and maintains financial record keeping and reporting systems
 - Facilitates organizational payroll function
 - Oversees and reviews billing, receivables, payables, cash receipts, cash disbursements, and general ledger functions
 - Monitors cash balances and initiates necessary fund transfers

- Tracks federal grant expenses, executes federal draw, and prepares, files, and maintains all required federal financial reporting; assists in subrecipient monitoring for federal subawards
 - Develops and maintains assessment tools for evaluating applicant and grantee financial risk
 - Prepares and presents quarterly financial statements to MHB's Finance—Investment Committee and Board of Trustees
 - Prepares monthly and year-end closings to ensure general ledger accounts are reconciled
 - Manages the filing of tax forms including, but not limited to 1099's and W2's
 - Oversees preparation of annual audit completed by an independent auditor
 - Serves as financial advisor to the Executive Director, the Secretary/Treasurer, and Finance—Investment Committee
 - Directs specific procurement procedures for services such as banking and audits as the contracted Controller for the City of St. Louis Senior Citizens' Fund
 - Participates in development of finance-related policies and procedures
4. Investment Management
 - Serves as liaison to investment management firm related to liquidation and transfers of funds from investment to operating accounts
 5. Other duties as assigned by management

QUALIFICATIONS:

1. Bachelor's degree in accounting, business administration, or related field, plus at least 8 years' experience in accounting and auditing at a management level in a business, corporate, government, or non-profit setting. Government accounting experience preferred.
2. CPA credential required
3. Excellent working knowledge of General Accounting Standards and Government Accounting Standards Board requirements
4. Working knowledge of Federal Uniform Guidance and other federal grant reporting
5. Proficient in MS Office and finance/accounting software. Preference for proficiency in QuickBooks.
6. Exceptional written and verbal communication skills
7. History of working cooperatively and effectively with public officials and agency personnel
8. Commitment to health equity and racial justice
9. Objective decision maker that does not include personal preference or bias in decisions
10. Excellent judgment and ability to handle confidential information
11. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Deputy Director**

Department: **Program**

FLSA Status: **Exempt**

Status: **Full-Time**

Reports to: **Executive Director**

Revision Date: **November 2022**

POSITION SUMMARY:

The Deputy Director assists the Executive Director in the overall planning, directing, and coordination of the work of Saint Louis MHB. Responsible for the oversight and coordination of community investments to facilitate attainment of MHB's strategic goals.

ESSENTIAL FUNCTIONS:

1. Planning

- Participates in and/or leads at the direction of the Executive Director MHB's formal planning processes, including but not limited to:
 - Periodic strategic planning
 - Needs assessments
 - Trend analysis
 - Periodic review of Community Investment Policies

2. Management

- The Director of Clinical Partnerships, Director of Prevention Partnerships, St. Louis Area Violence Prevention Commission Director, Children's Services Project Director, and the Digital Director report directly to this position
- Recruits, interviews, and recommends potential candidates to the Executive Director
- Trains and manages staff activities and workflow, while providing individualized, ongoing support and mentoring for direct reports
- Prepares annual performance evaluation for each direct report and submits to the Executive Director for review and approval
- Takes on duties and assignments of Executive Director in their absence

3. Community Leadership and Involvement

- Represents MHB at speaking engagements in the community related to the organization's mission
- Seeks opportunities for the Saint Louis MHB to provide community leadership, coordination, and collaboration to enhance community services
- Engages in local collaborations/groups related to behavioral health prevention, intervention, and/or alignment efforts
- Identifies and maintains relationships with a diverse group of community members, agencies, institutions, and government officials

4. Program Management

- Provides leadership of and oversight for MHB's grantmaking and community investment processes
- Oversees strategic initiatives, collaborative funding, and collective impact
- Acts as liaison with community investments, new project management, federal and state agencies related to distribution of public funds, coalition building, and community planning
- Ensures the grant management information system allows for production of data as it relates to programmatic and fiscal oversight of community investments
- Provides training for MHB applicants, grantees, staff and Trustees on the grantmaking process and outcome-based funding
- Engages in community groups and internal MHB activities which focus on building trust, transparency, and reducing the administrative burden for funded partners, while working to change the culture of grantmaking from transactional to transformational
- Identifies and addresses internal and external health equity and racial justice system inequities and works to foster systems change in community investment and grant making

5. Fiscal Management

- Participates in annual budgeting process
- Oversees the management of community investments as it relates to adherence to the approved operating budget

6. Other duties as assigned by the Executive Director

QUALIFICATIONS:

1. Master's degree in social work, psychology/counseling, public administration, or a related field, plus a minimum of 8 years' experience in supervisory or management positions. Four of those 8 years should be in non-profit or government agencies that make grants or enter into contracts for services.
2. Knowledge of human services delivery systems, grant making, and contracting processes
3. History of working cooperatively and effectively with public officials and agency personnel
4. Exceptional written and verbal communication skills
5. Proficient in MS Office, grant management, and finance/accounting software
6. Commitment to health equity and racial justice
7. Objective decision maker that does not include personal preference or bias in decisions
8. Excellent judgment and ability to handle confidential information
9. Valid driver's license
10. Reliable transportation allowing travel between locations when required
11. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Digital Director**

FLSA Status: **Exempt**

Department: **Operations**

Status: **Full-Time**

Reports to: **Deputy Director**

Revision Date: **November 2022**

POSITION SUMMARY:

The Digital Director manages the enterprise-wide administration of Saint Louis MHB technologies, digital systems solutions, vendor relationships, facilities management, and serves as the liaison to MHB's property manager.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes
2. Operations
 - Manages relationship and serves as liaison to Salesforce IT consultant and external IT support provider
 - In consultation with executive leadership, develops scopes of work for special projects
 - Serves as in-house expert for any technology and software systems used by MHB with the exception of QuickBooks accounting software for which the Controller serves as the in-house expert
 - Manages Salesforce and HubSpot generated emails to funded partners and community stakeholders
 - Trains staff and funded partners on the use of the grant management system for application processes, reporting, and record maintenance
 - Serves as first line IT support for MHB staff for technology and software issues, escalating issues to MHB's IT support provider as appropriate
 - Conducts annual inventory of MHB technology and manages equipment replacement using a pre-determined schedule
 - Oversees broadband/Internet and Wi-Fi access, ensuring functionality
 - Oversees MHB communication systems, including telephones, 3CX system, instant messaging, etc.
 - Monitors all existing vendor relationships, facilitates bid processes for new vendor services as needed, and oversees vendor contract renewals
 - Serves as liaison with property management organization

3. Community Relations and Public Affairs

- Creates strategy for internal and external communications for the organization
- Manages website and social media
- Maintains brand consistency

4. Other duties as assigned by management

QUALIFICATIONS:

1. Bachelor's degree in business, information technology, or related field, plus at least 4 years' experience in logistics, office management, computer/equipment, or related functions in a business, corporate, or non-profit setting
2. Proficient in MS Office, grant management, and finance/accounting software with the ability to train staff on the use of office system's software
3. Ability to remain up to date on current technologies, communication systems, social media, and Internet changes
4. History of working cooperatively and effectively with public officials and organizational personnel
5. Exceptional written and verbal communication skills
6. Commitment to health equity and racial justice
7. Objective decision maker that does not include personal preference or bias in decisions
8. Excellent judgment and ability to handle confidential information
9. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Director of Clinical Partnerships**

Department: **Program**

FLSA Status: **Exempt**

Status: **Full-Time**

Reports to: **Deputy Director**

Revision Date: **November 2022**

POSITION SUMMARY:

The Director of Clinical Partnerships manages community investments related to clinical behavioral health services for children, youth, and adults to facilitate attainment of MHB's strategic goals.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes including needs assessments
2. Management
 - May recruit, interview, and recommend potential candidates to the Deputy Director and Executive Director
 - May train and manage staff activities and workflow, while providing individualized, ongoing support and mentoring for direct reports
 - May prepare annual performance evaluation for each direct report and submit to the Deputy Director for review and approval
3. Community Leadership and Involvement
 - Represents MHB at speaking engagements in the community related to children, youth and adult behavioral health, as approved by the Deputy Director
 - Develops trusting collaborative relationships with community coalitions, funded partners, city residents, and other funders
 - At the direction of the Deputy Director, supports community-based initiatives or leads special projects focused on improving community responses to behavioral health needs, behavioral health prevention, and trauma-informed care
4. Program Management
 - Maintains up-to-date knowledge base of emerging issues related to clinical behavioral health programs and services affecting children, youth and adults in the communities served by Saint Louis MHB
 - Under the guidance of the Deputy Director, assists with the planning and implementation of grantmaking functions and processes related to the Community Mental Health Fund (CMHF) and the Community Children's Services Fund (CCSF)

- Implements all facets of the Permanent Supportive Housing Initiative in conjunction with the Grants Administrator and Executive Director
- Provides training for MHB applicants and funded partners on the grantmaking process and outcome-based funding
- Provides application support for MHB applicants and funded partners
- Ensures all CMHF and CCSF funded partners providing clinical behavioral health services are monitored and reports any performance, financial management, or contract compliance issues to the Deputy Director
- Provides capacity building support to applicants, funded partners, and grassroots organizations through connection to resources and tools intended to help improve and/or expand services
- Engages in community groups and internal MHB activities which focus on building trust, transparency, and reducing the administrative burden for funded partners, while working to change the culture of grantmaking from transactional to transformational
- Identifies and addresses internal and external health equity and racial justice system inequities and works to foster systems change in community investment and grant making

5. Other duties as assigned by management

QUALIFICATIONS:

1. Master's degree in social work, psychology, counseling, marriage and family therapy, or related field and a clinical mental health license required, plus at least 6 years' experience providing clinical behavioral health services to children and youth; preference for a clinician with experience providing clinical behavioral health services across the lifespan.
2. Preference for experience at a management level in an organization providing human services
3. Knowledge of human services delivery systems, grant making, and contracting process
4. History of working cooperatively and effectively with public officials and agency personnel
5. Exceptional written and verbal communication skills
6. Proficient in Microsoft Office, grant management, and other platforms
7. Commitment to health equity and racial justice
8. Objective decision maker that does not include personal preference or bias in decisions
9. Excellent judgment and ability to handle confidential information
10. Valid driver's license

11. Reliable transportation allowing travel between locations when required
12. Independently mobile in a variety of locations and settings



SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Director of Prevention Partnerships**

FLSA Status: **Exempt**

Department: **Program**

Status: **Full-Time**

Reports to: **Deputy Director**

Revision Date: **April 2022**

POSITION SUMMARY:

The Director of Prevention Partnerships manages community investments related to prevention and community-based behavioral health services for children, youth, and adults to facilitate attainment of MHB's strategic goals.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes including needs assessments
2. Management
 - May recruit, interview, and recommend potential candidates to the Deputy Director and Executive Director
 - May train and manage staff activities and workflow, while providing individualized, ongoing support and mentoring for direct reports
 - May prepare annual performance evaluation for each direct report and submit to the Deputy Director for review and approval
3. Community Leadership and Involvement
 - Represents MHB at speaking engagements in the community related to adult behavioral health and prevention services, as approved by the Deputy Director
 - Develops trusting collaborative relationships with community coalitions, funded partners, city residents, and other funders
 - At the direction of the Deputy Director, supports community-based initiatives or leads special projects focused on improving community responses to behavioral health needs, behavioral health prevention, promoting violence prevention, and trauma-informed care

4. Program Management

- Maintains up-to-date knowledge base of emerging issues related to prevention and community-based behavioral health programs and services for children, youth, and adults in the communities served by Saint Louis MHB
- Under the guidance of the Deputy Director, assists with the planning and implementation of grantmaking functions and processes related to the Community Mental Health Fund (CMHF) and the Community Children's Service Fund (CCSF)
- Provides training for MHB applicants and funded partners on the grantmaking process and outcome-based funding
- Provides application support for MHB applicants and funded partners
- Ensures all CMHF and CCSF funded partners' activities are monitored and reports any performance, financial management, or contract compliance issues to the Deputy Director
- Provides capacity building support to applicants, funded partners, and grassroots organizations through connection to resources and tools intended to help improve and/or expand services
- Engages in community groups and internal MHB activities which focus on building trust, transparency, and reducing the administrative burden for funded organizations, while working to change the culture of grantmaking from transactional to transformational
- Identifies and addresses internal and external health equity and racial justice system inequities and works to foster systems change in community investment and grant making

5. Other duties as assigned by management

QUALIFICATIONS:

1. Master's degree in social work, public administration, public health, psychology, counseling, or related field, plus at least 6 years' experience in a private or government agency that makes grants or enters into contracts for services with agencies OR equivalent experience at a management level in an organization providing human services.
2. Preference for a licensed mental health clinician
3. Knowledge of human services delivery systems, grant making, and contracting process
4. History of working cooperatively and effectively with public officials and agency personnel
5. Exceptional written and verbal communication skills
6. Proficient in Microsoft Office, grant management, and other platforms
7. Commitment to health equity and racial justice
8. Objective decision maker that does not include personal preference or bias in decisions
9. Excellent judgment and ability to handle confidential information

10. Valid driver's license

11. Reliable transportation allowing travel between locations when required

12. Independently mobile in a variety of locations and settings



SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Executive Assistant**

FLSA Status: **Exempt**

Department: **Operations**

Status: **Full-Time**

Reports to: **Executive Director**

Creation Date: **November 2022**

POSITION SUMMARY:

The Administrative Assistant provides excellent internal and external customer service in the delivery of wide-ranging administrative support to organizational leadership, finance, and programmatic staff of the Saint Louis MHB.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes
2. Operations
 - Provides confidential administrative support to the Executive Director and Deputy Director including meeting coordination, events, calendar maintenance, correspondence, memoranda, and preparing general communications
 - Provides administrative support to the Community Investment processes and other non-property tax operating grants
 - Assists the Executive Director with communications and scheduling with Trustees on all matters related to Board recruitment, appointments, and onboarding
 - Assists the Executive Director with communications and scheduling with Trustees on all matters related to Board Committee meetings, materials, meeting minutes, and Committee support
 - Ensures files of MHB Board of Trustees' meeting agenda, approved resolutions, meeting minutes, are maintained electronically
 - Facilitates general office supply ordering and maintenance
 - Manages travel arrangements, conference attendance, and professional development/continuing education registration for all MHB staff
3. Other duties as assigned by management

QUALIFICATIONS:

1. Associates degree in business administration or related field plus at least 4 years' experience in a business, corporate, government, or non-profit setting OR equivalent combination of education and experience
2. Initiative-taking and self-directed performer with the ability to use a consultative approach when appropriate.
3. History of working cooperatively and effectively with public officials and organizational personnel
4. Exceptional written and verbal communication skills
5. Proficient in MS Office, grant management, and finance/accounting software
6. Commitment to health equity and racial justice
7. Objective decision maker that does not include personal preference or bias in decisions
8. Excellent judgment and ability to handle confidential information
9. Valid driver's license
10. Reliable transportation allowing travel between locations when required
11. Independently mobile in a variety of locations and settings



SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Executive Director**

Departments: **Program and Operations**

FLSA Status: **Exempt**

Status: **Full-Time**

Reports to: **Board of Trustees**

Revision Date: **March 2022**

POSITION SUMMARY:

The Executive Director provides leadership to the MHB team. As such, they are responsible for the overall performance of the organization in meeting statutory and Board policy requirements. The Executive Director works in concert with Trustees, staff, consultants, and the community to advance the organization's mission.

ESSENTIAL FUNCTIONS:

1. Planning

- Leads organizational planning efforts in conjunction with Trustees, key stakeholders, and staff that include but are not limited to:
 - Periodic strategic planning
 - Needs assessments
 - Trend analysis
 - Review of existing organizational policies and procedures

2. Board Leadership and Development

- Prepares materials for Board meetings in conjunction with the Board Chair to include, but not limited to:
 - Agendas
 - Resolutions and accompanying background materials
 - Meeting minutes and other public documents
- Provides orientation for new Trustees and ongoing training, development, and education for Trustees as it relates to the execution of their duties and responsibilities
- Supports meetings and the activities of all standing and ad hoc Board Committees to include, but not limited to:
 - Executive Committee
 - Nominating Committee
 - Personnel Committee
 - Finance Committee
 - Housing Committee
 - Program Committee

3. Planning

- Leads organizational planning efforts in conjunction with Trustees, key stakeholders, and staff that include but are not limited to:
 - Periodic strategic planning
 - Needs assessments
 - Trend analysis
 - Review of existing organizational policies and procedures

4. Board Leadership and Development

- Prepares materials for Board meetings in conjunction with the Board Chair to include, but not limited to:
 - Agendas
 - Resolutions and accompanying background materials
 - Meeting minutes and other public documents
- Provides orientation for new Trustees and ongoing training, development, and education for Trustees as it relates to the execution of their duties and responsibilities
- Supports meetings and the activities of all standing and ad hoc Board Committees to include, but not limited to:
 - Executive Committee
 - Nominating Committee
 - Personnel Committee
 - Finance Committee
 - Housing Committee
 - Program Committee

5. Management

- Maintains a staff, equipment, and office sufficient to conduct the business of the organization including:
 - Fiscal Management
 - Human Resources Management
 - Community Investment grant making and contracting functions
 - Community Relations and Public Awareness
- Determines the quantity and qualifications of staff needed to execute the responsibilities of the organization and sets salaries within the parameters of Board-approved salary ranges
- The Executive Director has the authority to hire, reward, promote, suspend, and terminate employees
 - Recruits, interviews, and approves candidates
 - Trains and manages staff activities and workflow, while providing individualized, ongoing support and mentoring for direct reports
 - Prepares annual performance evaluation for each direct report and other duties as deemed appropriate by the Board of Trustees
- The Deputy Director and Director of Operations report directly to this position
- Acts as liaison to outside legal counsel at the direction of the Board of Trustees

6. Community Leadership and Involvement

- Represents MHB at speaking engagements in the community related to the organization's mission
- Seeks opportunities for the Saint Louis MHB to provide community leadership, coordination, and collaboration to enhance community services
- Engages in local collaborations/groups related to behavioral health prevention, intervention, and/or alignment efforts
- Identifies and maintains relationships with a diverse group of community members, agencies, institutions, and government officials

7. Program Management

- Provides direction and support to the Deputy Director relating to among other things, the grantmaking process
- Provides support and direction to the Board of Trustees in the implementation of their grant making responsibilities
- Ensures grantees' activities are monitored
- Provides regular updates of funded program activities to the Board of Trustees
- Engages in community groups and internal MHB activities which focus on building trust, transparency, and reducing the administrative burden for funded partners, while working to change the culture of grantmaking from transactional to transformational
- Identifies and addresses internal and external health equity and racial justice system inequities and works to foster systems change in community investment and grant making

8. Fiscal Management

- Oversees preparation and development of the annual operating budget in conjunction with the Controller and selected staff
- Oversees the management of organizational revenue and expenditures as it relates to adherence to the approved operating budget
- Maintains oversight of fiscal policies reviewed periodically, ensuring adequate internal controls and accounting systems are tracking income, and expenses and providing financial reports for analysis

9. Investment Management

- Acts as the organization's Investment Manager
- Working with the Controller and outside investment firm, periodically reviews investment policies and oversees MHB's investment portfolio

10. Community Relations and Public Awareness

- Implements a communications plan including, but not limited to public awareness activities, and other forms of communication to ensure the public, political, and community leaders are aware of the activities and benefits of the MHB offered through its funding
- Maintains good relations with government entities to remain aware of opportunities to increase available funding

11. Other duties as assigned by the Board of Trustees

QUALIFICATIONS:

1. Master's degree in a field of study which prepares individuals for the administration of health and human services and/or public administration, plus a minimum of 10 years' experience in supervisory or management positions. Five of those 10 years should be in non-profit or government agencies that make grants or enter into contracts for services.
2. Knowledgeable of human services delivery systems, grant making, and contracting processes
3. Extensive history of working cooperatively and effectively with public and elected officials
4. Exceptional written and verbal communication skills
5. Proficient in MS Office, grants management, and finance/accounting software
6. Commitment to health equity and racial justice
7. Objective decision maker that does not include personal preference or bias in decisions
8. Excellent judgment and ability to handle confidential information
9. Valid driver's license
10. Reliable transportation allowing travel between locations when required
11. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Grants Administrator**

FLSA Status: **Exempt**

Departments: **Program and Operations**

Status: **Full-Time**

Reports to: **Executive Director**

Revision Date: **November 2022**

POSITION SUMMARY:

The Grants Administrator provides excellent internal and external customer service in the delivery of wide-ranging grants administration and contracting to organizational leadership, finance, program staff, and funded partners.

ESSENTIAL FUNCTIONS:

4. Planning
 - Participates in MHB's formal planning processes
5. Operations
 - Implements all facets of the contracting process for the Community Mental Health Fund, Community Children's Services Fund, St. Louis Area Violence Prevention Commission, fiscal sponsorships, and federal grants
 - Ensures proper agency notification and adherence to Community Investment, compliance, and retention policies
 - Oversees records management and maintains electronic files with contractually required supporting documents for all funded partners, federal grants, funding partnerships, and initiatives
 - Works internally with program and other staff to implement grantmaking requirements and ensure effective workflow
 - Identifies opportunities to optimize grant workflow, collaborating with other colleagues to implement while ensuring continued quality and timeliness across all aspects of the grant cycle
 - Examines the impact of MHB's grant making processes on various stakeholders, particularly funded partners, grant seekers, and MHB staff as part of MHB's continuous quality improvement process
 - Manages the annual recertification process for Permanent Supportive Housing Initiative projects in conjunction with the Director of Clinical Partnerships
6. Other duties as assigned by management

QUALIFICATIONS:

1. Bachelor's degree in human services, psychology, business administration, or related field plus at least 4 years' experience in a business, corporate, government, or non-profit setting OR equivalent combination of education and experience
2. Initiative-taking and self-directed performer with the ability to use a consultative approach when appropriate.
3. History of working cooperatively and effectively with public officials and organizational personnel
4. Exceptional written and verbal communication skills
5. Proficient in MS Office, grant management, and finance/accounting software
6. Commitment to health equity and racial justice
7. Objective decision maker that does not include personal preference or bias in decisions
8. Excellent judgment and ability to handle confidential information
9. Valid driver's license
10. Reliable transportation allowing travel between locations when required
11. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **Senior Accountant**

Department: **Operations**

FLSA Status: **Exempt**

Status: **Part-Time (0.75 FTE)**

Reports to: **Controller**

Revision Date: **November 2022**

POSITION SUMMARY:

The Senior Accountant supports the enterprise-wide financial affairs of the Saint Louis MHB to facilitate the attainment of MHB's strategic goals. At the direction of the Controller, this position also provides accounting support for the City of St. Louis Senior Citizen's Fund. Additionally, at the direction of the Controller, the Accountant provides accounting support to the St. Louis Area Violence Prevention Commission for which Saint Louis MHB serves as the backbone organization and fiscal sponsor.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes
 - Leads the development and preparation of the annual organizational budget under the oversight of the Controller
2. Accounting & Finance
 - Performs accounting functions including, but not limited to managing the general ledger, processing cash receipts, analyzing account information, reconciling accounts, calculating depreciation and accruals, maintaining database of fixed assets, maintaining annual journal entry files, ensuring timely payment of vendor invoices, and preparing monthly invoices for any contracted work
 - Prepares monthly, quarterly, and annual financial reports or statements and program specific reports on a monthly basis at the direction of the Controller
 - Maintains supporting schedules for allocations related to payroll, health, dental/vision, and disability/life insurance
 - Performs annual reports and updates supporting the payroll function
 - Monitors spending on contracts utilizing accounting software
 - Assists with monthly, quarterly, and year-end closings; preparation of the annual audit; and preparation of 1099's
 - Participates in the development of finance-related policies and procedures
3. Other duties as assigned by management

QUALIFICATIONS:

1. Bachelor's degree in accounting, business administration, or related field, plus 4 years' experience in accounting and auditing in a business, corporate, government, or non-profit setting. Government accounting experience preferred.
2. CPA preferred, not required
3. Working knowledge of General Accounting Standards and Government Accounting Standards Board requirements
4. Knowledge of Federal Uniform Guidance and other federal grant reporting
5. Proficient in Microsoft Office and finance/accounting software. Preference for proficiency in QuickBooks.
6. Exceptional written and verbal communication skills
7. History of working cooperatively and effectively with public officials and agency personnel
8. Commitment to health equity and racial justice
9. Objective decision maker that does not include personal preference or bias in decisions
10. Excellent judgment and ability to handle confidential information
11. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **STL Area Violence Prevention Commission Director**

Department: **Program**

FLSA Status: **Exempt**

Status: **Full-Time**

Reports to: **Deputy Director**

Revision Date: **March 2022**

POSITION SUMMARY:

The St. Louis Area Violence Prevention Commission (VPC) Director is responsible for planning, implementing, and evaluating activities led by the VPC including general oversight, grant development and management, reporting, and technical assistance.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes including needs assessments
2. Management
 - May recruit, interview, and recommend potential candidates to the Deputy Director and Executive Director
 - May train and manage staff activities and workflow, while providing individualized, ongoing support and mentoring for direct reports
 - May prepare annual performance evaluation for each direct report and submit to the Deputy Director for review and approval
3. Strategic Learning and Capacity Building
 - Continually broadens expertise in the areas of collective impact, collaboration, and violence prevention locally and nationally to develop evidence-based strategies to reduce violence
 - Plans, coordinates, and conducts educational and training activities. Develops training, reference materials, and workshops for commission and community partners.
 - Creates and implements an evaluation plan for the work of VPC and its partners.

4. Communications

- Communicate effectively with member agencies to achieve objectives in the action plan including email list, newsletters, meeting reminders, and other communication
- Maintains VPC websites, social media accounts including creating content, scheduling posts, and sharing information from partners
- Functions as spokesperson and subject matter expert on the incidence of violence in the region, violence prevention strategies and organizations in St. Louis for media inquiries

5. Partnership Management

- Staffs and supports VPC committees by facilitating committee meetings, achieving committee goals by sending meeting notes, scheduling future meetings, and working on follow-up items
- Recruits and maintains a diverse regional commission membership from multiple sectors including law enforcement, criminal justice, social services, by conducting outreach, educating/training new members, and engaging them in the work of the VPC
- Represents VPC at community collaborative tables including the Vacancy Collaborative, Regional Data Alliance, Social Policy and Electoral Accountability Collaborative, and others
- Supports the implementation and adaptation of evidence-based strategies for violence prevention including READI Chicago

6. Policy Development

- Creates and disseminates a policy agenda on issues including police legitimacy and other violence prevention strategies
- Directs and assists the commission to educate the public and policymakers on information that promotes the commission's mission by:
 - Developing position statements
 - Reviewing and recommending strategies, and
 - Advocating for policies/legislation at local/state level

7. Grant Management

- Completes reporting necessary for VPC grants, as well as the Community Health Improvement Plan
- Evaluates and make recommendations on requests for VPC funding including “It Starts with Us” and other funding streams

8. Other duties as assigned by management

QUALIFICATIONS:

1. Master's degree in social work, public policy, public administration, public health, or related field plus at least 6 years' experience leading and managing coalitions, collective impact initiatives, or multi-sector partnerships
2. Knowledge of the violence prevention landscape in the St. Louis region
3. Excellent meeting facilitation and project management skills
4. History of working cooperatively and effectively with public officials and agency personnel
5. Proven ability to work independently

6. Excellent organizational skills
7. Exceptional written and verbal communication skills
8. Very proficient with Microsoft Office and other platforms
9. Commitment to health equity and racial justice
10. Objective Decision maker that does not include personal preference or bias in decisions
11. Excellent judgment and ability to handle confidential information
12. Valid driver's license
13. Reliable transportation allowing travel between locations when required
14. Independently mobile in a variety of locations and settings

SAINT LOUIS MHB JOB DESCRIPTION

Job Title: **STL Area Violence Prevention Commission Project Director**

Department: **Program**

FLSA Status: **Exempt**

Status: **Full-Time
Temporary**

Reports to: **STL Area Violence Prevention Commission Director**

Revision Date: **April 2022**

POSITION SUMMARY:

The St. Louis Area Violence Prevention Commission (VPC) Project Director is responsible for planning, implementing, and evaluating special projects led by VPC including but are not limited to, the Youth Safe Spaces Initiative, in partnership with the City of St. Louis.

ESSENTIAL FUNCTIONS:

1. Planning
 - Participates in MHB's formal planning processes
2. Communications
 - Contribute to the maintenance of VPC social media accounts including creating content, scheduling posts, and sharing information from partners
 - Contribute to content creation for the VPC newsletter and website
 - Support public engagement, promotion, and awareness activities
3. Program Management
 - Provide oversight and strategic implementation of the Youth Safe Spaces Initiative
 - Engage partners and build relationships across sectors to achieve the goals of the initiative
 - Evaluate proposals and make recommendations for VPC subcontracts and lead subcontract monitoring efforts for assigned projects
 - Provide technical assistance and capacity building support to help partners successfully serve the population of focus
 - Effectively manage assigned grants to comply with all financial and reporting requirements
 - Clearly communicate project progress, challenges, and opportunities to internal and external stakeholders
 - Use project evaluation strategies and tools that support continuous quality improvement

4. Partnership Management

- Staff and support VPC committees related to assigned special projects. Assist with coordination and facilitation of committee meetings and communicate effectively with members to promote collaboration, negotiation, and problem solving.
- Support committees between meetings to help them achieve their goals including sending notes from meetings, scheduling future meetings, and working on follow up items
- Represent VPC at community collaborative tables related to assigned special projects
- Support the implementation and adaptation of evidence-based strategies for violence prevention

5. Other duties as assigned by management

QUALIFICATIONS:

1. Bachelor's degree in public policy, education, public administration, planning, social work or related field plus at least 4 years' experience in project management
2. Knowledge of the violence prevention landscape in the St. Louis region
3. Excellent meeting facilitation skills
4. Proven ability to work independently
5. Excellent organizational skills
6. Excellent interpersonal and communication skills
7. Highly proficient in Microsoft Office and various other platforms
8. Commitment to health equity and racial justice
9. Valid driver's license
10. Reliable transportation allowing travel between locations when required
11. Independently mobile in a variety of locations and settings

APPENDIX – Pages not numbered

Sunshine Law Records Request Form

MHB Theory of Change (Approved November 2021)

FY 2022 Audit

Staff Organizational Chart (As of December 1, 2022)



**CITY OF SAINT LOUIS
MENTAL HEALTH BOARD OF TRUSTEES**

Sunshine Law Records Request Form

Custodian of Records

Cassandra Kaufman, Executive Director
City of St. Louis Mental Health Board of Trustees
333 South 18th Street, Suite 200
The Annex at Union Station
St. Louis, MO 63103

This is a request for records under the Missouri Sunshine Law, Chapter 610, Revised Statutes of Missouri.

I request that you make available to me the following records: _____
(Describe the records as specifically as possible. Where you are asking for records that cover only a particular period, such as last year or a specific month, identify that time period.)

If you know the subject matter of the records, but do not have additional information, use this alternative: _____

I request that you make available to me all records that relate to:
(Be as specific as possible; include dates if you can)

If you want and are willing to pay for copies of the records, rather than just being able to see them:
I request that the records responsive to my request be copied and sent to me at the following address: _____

If you believe your request serves the public interest, and is not just for personal or commercial interest, you may ask that fees be waived: _____

I request that all fees for locating and copying the records be waived. The information I obtain through this request will be used to: _____
(Tell how you will use the information and why that use is in the public interest)

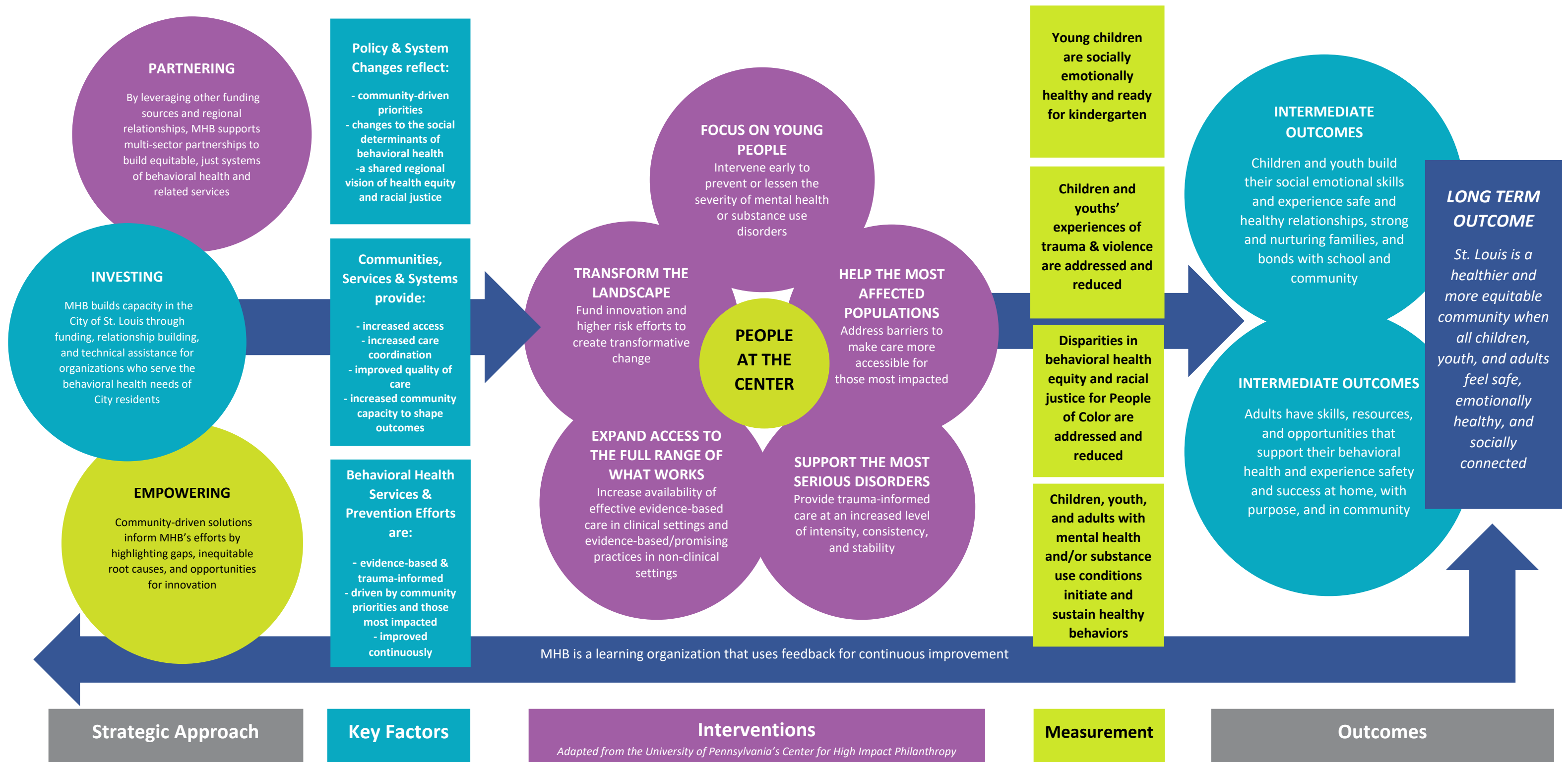
Please let me know in advance of any search or copying if the fees will exceed \$_____ **(Insert amount you are willing to pay without additional information about the documents)**

If portions of the requested records are closed, please segregate the closed portions and provide me with the rest of the records. If any part of my request for access is denied, please provide a written statement for each legal ground for such denial.

(Insert your name, address, phone number, or electronic mail address)

Saint Louis MHB's Theory of Change

COMMUNITY CONTEXT—Since 2008, the City of St. Louis' population has experienced improvements in factors of economic and community well-being (such as median household incomes, unemployment, violent crime, and most behavioral health emergency room visits). However, other key factors, like that of housing instability and homelessness, poverty rates and behavioral health hospital utilization have persisted or grown, with the data continuing to highlight the racial disparities in our region stemming from structurally and historically inequitable policies and biases. Regardless of the direction of change, most behavioral health risk indicators and outcomes for St. Louis City are far worse when compared with neighboring St. Louis County and the State of Missouri. Thus, City residents face greater challenges and greater behavioral health needs than their counterparts. Moreover, certain areas of the city, primarily in the eastern areas of far North and far South City experience the greatest impact. Most recently, these outcomes and racial disparities have been exacerbated by the COVID-19 pandemic, increasing the need for behavioral health and related safety net supports.



**CITY OF ST. LOUIS MENTAL HEALTH
BOARD OF TRUSTEES**

**FINANCIAL STATEMENTS AND
SUPPLEMENTARY INFORMATION**

YEARS ENDED JUNE 30, 2022 AND 2021

DRAFT

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
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YEARS ENDED JUNE 30, 2022 AND 2021**

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INDEPENDENT AUDITORS' REPORT

Board of Trustees
City of St. Louis Mental Health Board of Trustees
St. Louis, Missouri

Report on the Audit of the Financial Statements

Opinions

We have audited the accompanying financial statements City of St. Louis Mental Health Board of Trustees (St. Louis Mental Health Board), as of and for the years ended June 30, 2022 and 2021, and the related notes to the financial statements, which collectively comprise the St. Louis Mental Health Board's basic financial statements as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the St. Louis Mental Health Board, as of June 30, 2022 and 2021, and the respective changes in financial position, and, where applicable, cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the St. Louis Mental Health Board and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the St. Louis Mental Health Board's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditors' Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS and Government Auditing Standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of St. Louis Mental Health Board's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about St. Louis Mental Health Board's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and the schedules of selected pension information be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other

knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Supplementary Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the St. Louis Mental Health Board's basic financial statements. The schedule of grants, partnerships, and initiatives to organizations are presented for purposes of additional analysis and are not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with GAAS. In our opinion, the schedule of grants, partnerships, and initiatives to organizations is fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Information

Management is responsible for the other information included in the annual report. The other information comprises the financial summary but does not include the basic financial statements and our auditors' report thereon. Our opinions on the basic financial statements do not cover the other information, and we do not express an opinion or any form of assurance thereon.

In connection with our audit of the basic financial statements, our responsibility is to read the other information and consider whether a material inconsistency exists between the other information and the basic financial statements, or the other information otherwise appears to be materially misstated. If, based on the work performed, we conclude that an uncorrected material misstatement of the other information exists, we are required to describe it in our report.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated REPORT DATE, on our consideration of the St. Louis Mental Health Board's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the St. Louis Mental Health Board's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering St. Louis Mental Health Board's internal control over financial reporting and compliance.

CliftonLarsonAllen LLP

St. Louis, Missouri
REPORT DATE

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED JUNE 30, 2022 AND 2021**

This section of the City of St. Louis Mental Health Board of Trustees (MHB) annual financial report presents our analysis of MHB's financial performance during the fiscal years that ended on June 30, 2022 and 2021. Please read it in conjunction with the financial statements that follow this section.

FINANCIAL HIGHLIGHTS

- MHB's net position as of June 30, 2022, increased by \$4.35 million.
- MHB's fiscal year 2022 tax revenues were over budget by \$1.25 million or 8.3%, due to greater than expected collections.
- MHB's fiscal year 2022 expenses were less than budgeted by \$1.4 million or 9.1% due to decreases in disbursements for contracts and federal direct services of certain agencies related to their actual expenses being less than originally budgeted. In addition, there was reduced spending in certain operating expense categories due to the COVID-19 pandemic and underspending of professional fees as compared to the amended budget.

THE FINANCIAL REPORT

MHB's financial statements consist of the following parts:

- Management's Discussion and Analysis (MD&A)
- The basic financial statements, which include the statements of net position; the statements of revenues, expenses, and changes in net position; and the statements of cash flows, along with the notes to the basic financial statements.
- Additional Information

MHB follows GASB guidance which establishes accounting and financial reporting standards for general purpose external financial reporting.

THE STATEMENTS OF NET POSITION AND THE STATEMENTS OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION

These statements help to illustrate the status of MHB resulting from the years' activities. The statements include all assets, deferred outflows, liabilities, and deferred inflows using the accrual basis of accounting. In this method, all of the years' revenues and expenses are taken into account regardless of when cash is paid or received.

The majority of MHB's activities are financed from property taxes collected by the City of St. Louis Collector of Revenue.

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED JUNE 30, 2022 AND 2021**

STATEMENTS OF NET POSITION

The following tables reflect the condensed statements of net position as of June 30, 2022 and 2021:

**Condensed Statements of Net Position
(In Thousands of Dollars)**

	2022	2021	Amount Change	Percent Change
Current Assets	\$ 17,446	\$ 14,077	\$ 3,369	23.9 %
Noncurrent Assets	10,066	8,418	1,648	19.6
Total Assets	<u>27,512</u>	<u>22,495</u>	<u>5,017</u>	<u>22.3</u>
Deferred Outflows of Resources	<u>204</u>	<u>419</u>	<u>(215)</u>	<u>(51.3)</u>
Total Assets and Deferred Outflows of Resources	<u>\$ 27,716</u>	<u>\$ 22,914</u>	<u>\$ 4,802</u>	<u>21.0 %</u>
Current Liabilities	\$ 1,056	\$ 402	\$ 654	162.7 %
Noncurrent Liabilities	684	1,102	(418)	(37.9)
Total Liabilities	<u>1,740</u>	<u>1,504</u>	<u>236</u>	<u>15.7</u>
Deferred Inflows of Resources	<u>217</u>	<u>-</u>	<u>217</u>	<u></u>
Net Position				
Investment in Capital Assets and Right-to-Use Lease Assets	181	280	(99)	(35.4)
Unrestricted	<u>25,578</u>	<u>21,130</u>	<u>4,448</u>	<u>21.1</u>
Total Net Position	<u>25,759</u>	<u>21,410</u>	<u>4,349</u>	<u>20.3</u>
Total Liabilities, Deferred Inflows of Resources, and Net Position	<u>\$ 27,716</u>	<u>\$ 22,914</u>	<u>\$ 4,802</u>	<u>21.0 %</u>

MHB's net position increased \$4.35 million as a result of this year's operations, resulting in ending net position of \$25.8 million, or an increase of 20.3%. Unrestricted net position (the part of net position that can be used to finance project services and administrative operations without legal restrictions or obligations) increased from \$21.1 million to \$25.6 million, or an increase of 21.1% at year-end. MHB can use these funds for continuing project services and administrative operations.

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED JUNE 30, 2022 AND 2021**

The components of unrestricted net position at June 30, 2022 and 2021 are as follows:

	<u>2022</u>	<u>2021</u>
	<i>(In Thousands)</i>	
Assigned for Grants and Partnerships	\$ 13,361	\$ 11,380
Nonspendable Forgivable Loans for Mental Health Supported Housing	2,276	2,483
Assigned for:		
Mental Health Supported Housing Loans	500	500
Emerging Needs	1,171	250
Administration	1,031	1,005
Unreserved, Unassigned	7,239	5,512
Total Unrestricted Net Position	<u>\$ 25,578</u>	<u>\$ 21,130</u>

A review of the June 30, 2022 statement of net position reveals the following:

Total assets of MHB are \$27.7 million. This includes cash and cash equivalents of \$11.8 million and investments of \$12.7 million. Total liabilities are \$1.7 million, including net pension liability of \$0.7 million. The most significant current liability is accounts and grants payable which totals \$0.83 million.

Total net position of MHB is \$25.8 million. This consists mostly of unrestricted net position.

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**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED JUNE 30, 2022 AND 2021**

The following tables reflect the condensed statements of net position as of June 30, 2021 and 2020:

**Condensed Statements of Net Position
(In Thousands of Dollars)**

	2021	2020	Amount Change	Percent Change
Current Assets	\$ 14,077	\$ 10,544	\$ 3,533	33.5 %
Noncurrent Assets	8,418	11,522	(3,104)	(26.9)
Total Assets	22,495	22,066	429	1.9
Deferred Outflows of Resources	419	245	174	71.0
Total Assets and Deferred Outflows of Resources	<u>\$ 22,914</u>	<u>\$ 22,311</u>	<u>\$ 603</u>	<u>2.7 %</u>
Current Liabilities	\$ 402	\$ 339	\$ 63	18.6 %
Noncurrent Liabilities	1,102	730	372	51.0
Total Liabilities	1,504	1,069	435	40.7
Deferred Inflows of Resources	-	16	(16)	(100.0)
Net Position				
Investment in Capital Assets and Right-to-Use Lease Assets	280	65	215	330.8
Unrestricted	21,130	21,161	(31)	(0.1)
Total Net Position	21,410	21,226	184	0.9
Total Liabilities, Deferred Inflows of Resources, and Net Position	<u>\$ 22,914</u>	<u>\$ 22,311</u>	<u>\$ 603</u>	<u>2.7 %</u>

MHB's net position increased \$0.18 million as a result of this year's operations, resulting in ending net position of \$21.4 million, or an increase of 0.9%. Unrestricted net position (the part of net position that can be used to finance project services and administrative operations without legal restrictions or obligations) decreased from \$21.16 million to \$21.13 million, or a decrease of 0.1% at year-end. MHB can use these funds for continuing project services and administrative operations.

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED JUNE 30, 2022 AND 2021**

The components of unrestricted net position at June 30, 2021 and 2020 are as follows:

	<u>2021</u>	<u>2020</u>
	<i>(In Thousands)</i>	
Assigned for Grants, Partnerships, and Initiatives	\$ 11,380	\$ 11,821
Nonspendable Forgivable Loans for Mental Health Supported Housing	2,483	1,520
Assigned for:		
Mental Health Supported Housing Loans	500	1,490
Unanticipated Projects	250	100
Administration	1,005	1,494
Unreserved, Unassigned	5,512	4,736
Total Unrestricted Net Position	<u>\$ 21,130</u>	<u>\$ 21,161</u>

A review of the June 30, 2021 statement of net position reveals the following:

Total assets of MHB are \$22.9 million. This includes cash and cash equivalents of \$5.3 million and investments of \$13.7 million. Total liabilities are \$1.5 million. This includes net pension liability of \$1.0 million. The most significant current liability is accounts and grants payable which totals \$0.18 million.

Total net position of MHB is \$21.4 million. This consists mostly of unrestricted net position.

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**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED JUNE 30, 2022 AND 2021**

STATEMENTS OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION OPERATING REVENUES AND EXPENSES

MHB classifies all operating and nonoperating revenues and expenses in the same manner that individual transactions are classified for cash flow purposes under GASB guidance.

The following table reflects the revenues and expenses of MHB's activities for the years ended June 30, 2022 and 2021:

**Condensed Statements of Revenues,
Expenses, and Changes in Net Position
(In Thousands of Dollars)**

	<u>2022</u>	<u>2021</u>	<u>Amount Change</u>	<u>Percent Change</u>
Operating Revenues	\$ 18,394	\$ 16,820	\$ 1,574	9.4%
Operating Expenses	<u>14,046</u>	<u>16,636</u>	<u>(2,590)</u>	<u>(15.6)</u>
Excess (Deficit) of Operating Revenues Over Expenses	4,348	184	4,164	(2,258.0)
Beginning Net Position	<u>21,410</u>	<u>21,226</u>	<u>184</u>	<u>0.9</u>
Ending Net Position	<u><u>\$ 25,758</u></u>	<u><u>\$ 21,410</u></u>	<u><u>\$ 4,348</u></u>	<u><u>20.3 %</u></u>

A review of the June 30, 2022 statement of revenues, expenses, and changes in net position indicates the most significant component of revenues is tax revenues of \$16.3 million. Property tax revenues represent \$15.1 million of this total. Another major source of revenues are operating grants which consist of federal grants totaling \$2.1 million.

Major expenses relate to projects and grants that provide direct funding to local agencies performing a variety of services in the community.

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED JUNE 30, 2022 AND 2021**

The following table reflects the revenues and expenses of MHB's activities for the years ended June 30, 2021 and 2020:

**Condensed Statements of Revenues,
Expenses, and Changes in Net Position
(In Thousands of Dollars)**

	2021	2020	Amount Change	Percent Change
Operating Revenues	\$ 16,820	\$ 14,281	\$ 2,539	17.8%
Operating Expenses	16,636	14,337	2,299	16.0
Deficit of Operating Revenues Over Expenses	184	(56)	240	428.6
Beginning Net Position	21,226	21,282	(56)	(0.3)
Ending Net Position	<u>\$ 21,410</u>	<u>\$ 21,226</u>	<u>\$ 184</u>	<u>0.9 %</u>

A review of the June 30, 2021 statement of revenues, expenses, and changes in net position indicates the most significant component of revenues is tax revenues of \$13.1 million. Property tax revenues represent \$12.2 million of this total. Another major source of revenues is operating grants which consist of federal grants totaling \$3.4 million.

Major expenses relate to projects and grants that provide direct funding to local agencies performing a variety of services in the community.

ECONOMIC FACTORS AND NEXT YEAR'S BUDGET AND RATES

MHB and management considered many factors when setting the fiscal year 2023 budget. Factors include the approved property tax rates and the economy. Property tax rates for the upcoming budget year are \$0.0888 and \$0.2443 per \$100 assessed valuation for the Mental Health Fund and the Community Children's Services Fund, respectively.

BUDGET INFORMATION

Total revenues are expected to increase by 15% in fiscal year 2023 primarily due to the following: ARPA funding of \$2 million for Supporting Providers of Early Childhood Education and Childcare Tuition Assistance, SAMHSA funding of \$0.6 million (\$0.45 million of which is expected to be recognized in fiscal year 2023) supporting the Violence Prevention Commission's Gun Violence Response Network with Mental Health Access and a non-Federal, Violence Prevention Commission grant of \$0.7 million (\$0.475 million of which is expected to be recognized in fiscal year 2023) supporting the National League of Cities Institute's Municipalities Reimagining Community Safety Initiative.

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED JUNE 30, 2022 AND 2021**

Total expenses are expected to increase by 52% in fiscal year 2023 primarily due to the following: expenditures related to ARPA funding Supporting Providers of Early Childhood Education and Childcare Tuition Assistance, SAMHSA funding supporting the Violence Prevention Commission's Gun Violence Response Network with Mental Health Access, funding for the National League of Cities Institute's Municipalities Reimagining Community Safety Initiative and ARPA funding supporting the Violence Prevention Commission's Youth Safe Spaces initiative. Additionally, Community Investment grants and personnel expenses related to the Early Childhood Fund will commence in fiscal year 2023. The fiscal year 2023 budget also includes \$0.5 million for Permanent Supporting Housing projects.

FINANCIAL CONTACT

The financial report is designed to provide users with a general overview of MHB's finances and demonstrate MHB's accountability. Any questions regarding the report or requests for additional information should be directed to:

Executive Director
City of St. Louis Mental Health Board of Trustees
333 S. 18th Street, Suite 200
St. Louis, Missouri 63103

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CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
STATEMENTS OF NET POSITION
JUNE 30, 2022 AND 2021

	<u>2022</u>	<u>2021</u>
ASSETS AND DEFERRED OUTFLOWS		
CURRENT ASSETS		
Cash and Cash Equivalents	\$ 11,787,828	\$ 5,338,948
Investments	4,656,006	7,635,519
Receivables:		
Accounts Receivable	78,580	24,215
Grants Receivable and Other Receivables	263,787	266,376
Taxes Receivable	112,215	227,777
Mental Health Supported Housing Loans Receivable	442,343	433,189
Prepaid Expenses and Other Current Assets	<u>104,635</u>	<u>150,340</u>
Total Current Assets	17,445,394	14,076,364
NONCURRENT ASSETS		
Investments	8,025,696	6,063,164
Mental Health Supported Housing Loans Receivable	1,834,143	2,049,414
Other Assets	25,959	25,716
Capital Assets, Net	97,495	124,810
Right-to-Use Lease, net	<u>83,015</u>	<u>155,101</u>
Total Noncurrent Assets	10,066,308	8,418,205
 Total Assets	 27,511,702	 22,494,569
DEFERRED OUTFLOWS OF RESOURCES		
Pension Related	<u>204,186</u>	<u>419,065</u>
 Total Assets and Deferred Outflows of Resources	 <u>\$ 27,715,888</u>	 <u>\$ 22,913,634</u>

See accompanying Notes to Financial Statements.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
STATEMENTS OF NET POSITION (CONTINUED)
JUNE 30, 2022 AND 2021

	<u>2022</u>	<u>2021</u>
LIABILITIES, DEFERRED INFLOWS, AND NET POSITION		
CURRENT LIABILITIES		
Accounts and Grants Payable	\$ 838,860	\$ 178,089
Accrued Liabilities	145,883	151,913
Current Lease Liability	<u>70,937</u>	<u>72,121</u>
Total Current Liabilities	1,055,680	402,123
NONCURRENT LIABILITIES		
Net Pension Liability	672,392	1,018,363
Non-Current Lease Liability	<u>12,044</u>	<u>82,980</u>
Total Noncurrent Liabilities	684,436	1,101,343
Total Liabilities	1,740,116	1,503,466
DEFERRED INFLOWS OF RESOURCES		
Pension Related	217,249	-
NET POSITION		
Investment in Capital Assets	180,509	279,911
Unrestricted	<u>25,578,014</u>	<u>21,130,257</u>
Total Net Position	<u>25,758,523</u>	<u>21,410,168</u>
Total Liabilities, Deferred Inflows of Resources, and Net Position	<u>\$ 27,715,888</u>	<u>\$ 22,913,634</u>

See accompanying Notes to Financial Statements.

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
STATEMENTS OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION
YEARS ENDED JUNE 30, 2022 AND 2021**

	<u>2022</u>	<u>2021</u>
OPERATING REVENUES		
Property Taxes:		
Mental Health Fund	\$ 4,011,120	\$ 3,928,120
Community Children's Services Fund	11,109,039	8,301,928
Manufacturing, Institutional, and Other Taxes:		
Mental Health Fund	297,367	275,741
Community Children's Services Fund	833,011	582,702
Operating Grants - Federal	2,140,246	3,424,891
Operating Grants - Nonfederal	195,595	113,223
Investment Return, Net of Fees	(268,711)	41,720
Miscellaneous Income	<u>76,705</u>	<u>151,216</u>
Total Operating Revenues	18,394,372	16,819,541
OPERATING EXPENSES		
Grants, Partnerships, and Initiatives	11,746,332	14,414,100
Forgiveness of Mental Health Supported Housing Loans	196,119	148,271
Direct Project Expenses	1,122,509	1,213,498
Administration	<u>981,057</u>	<u>859,281</u>
Total Operating Expenses	14,046,017	16,635,150
EXCESS (DEFICIT) OF OPERATING REVENUES OVER EXPENSES	4,348,355	184,391
Net Position - Beginning of Year (as restated)	<u>21,410,168</u>	<u>21,225,777</u>
NET POSITION - END OF YEAR	<u>\$ 25,758,523</u>	<u>\$ 21,410,168</u>

See accompanying Notes to Financial Statements.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
STATEMENTS OF CASH FLOWS
YEARS ENDED JUNE 30, 2022 AND 2021

	2022	2021
CASH FLOWS FROM OPERATING ACTIVITIES		
Cash Received from Property and Other Taxes	\$ 16,366,099	\$ 12,981,592
Interest and Dividends Received	246,676	301,433
Proceeds from Other Support	2,414,160	3,551,123
Cash Paid for Projects	(11,466,485)	(15,772,907)
Cash Paid for Salaries and Employee Benefits	(1,221,059)	(1,246,011)
Cash Received (Paid) for Other Operating Activities	(407,743)	(534,603)
Net Cash Provided (Used) by Operating Activities	5,931,648	(719,373)
CASH FLOWS FROM CAPITAL ACTIVITIES		
Purchases of Capital Assets	(5,900)	(80,977)
Proceeds from Sale of Capital Assets	50	200
Net Cash Used by Capital Activities	(5,850)	(80,777)
CASH FLOWS FROM INVESTING ACTIVITIES		
Purchases of Investments	(7,473,918)	(4,246,079)
Sales of Investments	7,997,000	4,283,000
Net Cash Provided by Investing Activities	523,082	36,921
NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS	6,448,880	(763,229)
Cash and Cash Equivalents - Beginning of Year	5,338,948	6,102,177
CASH AND CASH EQUIVALENTS - END OF YEAR	<u>\$ 11,787,828</u>	<u>\$ 5,338,948</u>
RECONCILIATION OF EXCESS (DEFICIT) OF OPERATING REVENUES OVER EXPENSES TO NET CASH USED BY OPERATING ACTIVITIES:		
Excess of Operating Revenues Over Expenses	\$ 4,348,355	\$ 184,391
Adjustments to Reconcile Excess (Deficit) of Operating Revenues Over Expenses to Net Cash Used by Operating Activities:		
Depreciation and Amortization	33,215	19,361
Amortization of ROU Assets	72,086	72,085
Forgiveness of Mental Health Supported Housing Loans	196,119	148,271
Unrealized (Gain)/Loss	493,899	265,582
(Gain) Loss on Sale of Capital Assets	(50)	1,267
Change in Assets and Liabilities:		
Increase in Accounts Receivable	(54,365)	(23,000)
(Increase) Decrease in Grants Receivable	2,589	(115,207)
(Increase) Decrease in Taxes Receivable	115,562	(106,899)
Right of Use Assets	(72,120)	(72,085)
(Increase) Decrease in Mental Health Supported Housing Loans Receivable	9,998	(1,111,000)
(Increase) Decrease in Prepaid Expenses and Other Assets	45,462	(71,441)
(Increase) Decrease in Deferred Outflows	214,879	(173,880)
Increase (Decrease) in Accounts and Grants Payable and Accrued Liabilities	654,741	(3,948)
Decrease in Refundable Advances	-	(5,000)
Increase (Decrease) in Deferred Inflows	217,249	(15,546)
Increase (Decrease) in Net Pension Liability	(345,971)	287,676
Net Cash Provided (Used) by Operating Activities	<u>\$ 5,931,648</u>	<u>\$ (719,373)</u>

See accompanying Notes to Financial Statements.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Organization and Reporting Entity

The City of St. Louis Mental Health Board of Trustees (MHB) is a public authority which derives its authority from RSMo. 205.975-205.990, effective January 2, 1991. MHB uses Mental Health Fund (MHF) receipts to provide services directly and/or by contract with any public facilities or nonprofit corporations which in turn provide programs and services to promote the mental health of residents of the City of St. Louis, Missouri by enhancing the availability and accessibility of essential community mental health and substance abuse programs. The passage of Proposition K by City of St. Louis voters in November 2004 created the Community Children's Services Fund (CCSF). CCSF's focus is to fund a wide range of programs and services which give children in the City of St. Louis a safe environment and opportunities to succeed in accordance with RSMo. 210-860-201.861.

CCSF has been established as a legally separate entity. However, because by statute the MHB acts as the governing body of the CCSF, the CCSF is reported as if it were part of MHB. Separate financial statements for the CCSF are not available. MHF and CCSF have the same governance board.

The City of St. Louis, Missouri (the City) has accountability for MHB because it appoints MHB's governing board. As such, MHB is considered a related organization of the City for financial reporting purposes. However, MHB is fiscally independent of the City. Therefore, the City is not financially accountable for MHB, and MHB is not a component unit of the City.

MHB continues to report under the governmental nonprofit reporting model as a business-type activities governmental entity allowed under GASB 29 and GASB 34.

Basis of Presentation and Method of Accounting

The financial statements of MHB have been prepared on the accrual basis of accounting, in conformity with accounting principles generally accepted in the United States of America (GAAP), as applied to governmental units. The Governmental Accounting Standards Board (GASB) is the accepted standard setting body for establishing governmental and financial reporting principles.

MHB's financial statements are presented in accordance with the provisions of GASB guidance that establishes the manner in which MHB records transactions and presents financial information. GASB guidance also requires that the financial statements be accompanied by a narrative introduction and analytical overview of the entity's financial activities in the form of "management's discussion and analysis."

Estimates

The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Accordingly, actual results could differ from those estimates.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Appropriations

MHB appropriates funds for specific projects and programs to be expended for the following year's program service funding period July 1, 2022 to June 30, 2023. These funds are to be distributed to various agencies which then provide programs and services to eligible persons of the City of St. Louis.

Compensated Absences

Accumulated unpaid vacation expense and a portion of the Executive Director's sick leave are reported in the period earned and are accrued in the accompanying financial statements until used. All other accrued sick leave is lost upon termination and, accordingly, is not recorded in the financial statements.

Property Tax Collections and Expenses

MHB's principal source of revenue is property taxes levied and collected by the City on MHB's behalf. Taxes collected in one month are often distributed to MHB in the subsequent month. Consequently, property taxes are recognized as revenue only to the extent they have been collected by the City's collector of revenue. Undistributed taxes are included in taxes receivable. Undistributed property taxes totaled \$112,215 and \$227,777 in 2022 and 2021, respectively.

MHB has adopted a fiscal year that begins July 1 each year. Property taxes are collected several months prior to the start of the fiscal year. This creates a balance in cash and cash equivalents, and investments at the end of the fiscal year that will be used to pay for the services approved for the fiscal year beginning July 1. The amount of these approved services is part of unrestricted net position.

Cash and Cash Equivalents

MHB considers all short-term investments with an original maturity of three months or less at the time of purchase to be cash equivalents.

Investments

Investments are presented at fair value in accordance with GASB guidelines. Unrealized gains and losses are included in the statements of revenues, expenses, and changes in net position.

Interest Rate Risk: Interest rate risk is the risk that changes in interest rates of debt investments will adversely affect the fair value of an investment. MHB has a formal investment policy that limits investment maturities to five years as a means of managing its exposure to fair value losses arising from increasing interest rates.

Credit Risk of Debt Securities: Credit risk is the risk that an issuer of an investment will not fulfill its obligation to the holder of the investment. This is measured by the assignment of a rating by a nationally recognized statistical rating organization. MHB has a formal investment policy that limits its investment choices.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Investments (Continued)

Custodial Credit Risk: Custodial credit risk is the risk that in the event of the failure of the bank or counterparty, MHB will not be able to recover the value of the investment or collateral securities that are in possession of an outside party. Protection of MHB's investments is provided by the Federal Deposit Insurance Corporation, or by an irrevocable letter of credit established by the financial institution for the benefit of MHB.

Concentration of Credit Risk: Concentration of credit risk is the risk of a loss attributed to the magnitude of MHB's investment in a single issuer. MHB's investment policy prohibits investment in bankers' acceptances and commercial paper by the same issuer in excess of 5% of the total market value of the portfolio. MHB also established a set of diversification standards by security type and by issuer as a means of limiting its exposure to concentration of credit risk.

Fair Value Measurements

MHB categorizes its fair value measurements within the fair value hierarchy established by GAAP. The hierarchy is based on the valuation inputs used to measure the fair value of the asset. Level 1 inputs are quoted prices in active markets for identical assets; Level 2 inputs are significant other observable inputs; Level 3 inputs are significant unobservable inputs.

MHB's investments consist of agency securities and certificates of deposit with maturities longer than three months. These investments are valued using evaluated pricing, which incorporates modeling techniques, information from extensive market sources, observed transaction data, credit quality information, perceived market movements, news, and other relevant information.

Capital Assets

Capital assets are stated at cost. Major additions and improvements are capitalized, while maintenance and repairs are expensed as incurred. When assets are sold or otherwise disposed of, the related cost and accumulated depreciation are removed from the accounts. Any gain or loss arising from such disposition is included as income or expense in the year of disposition.

Depreciation is computed using the straight-line method over the estimated useful lives of the assets.

The estimated lives for computing depreciation on capital assets are three to seven years.

Components of Net Position

Investment in Capital Assets

Investment in capital assets consists of the cost of furniture and equipment, and software, net of the related accumulated depreciation expense.

Unrestricted

Nonspendable Forgivable Loans for Mental Health Supported Housing – Loans issued to agencies for housing projects expected to be forgiven in future years.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Components of Net Position (Continued)

Unrestricted (Continued)

Assigned for Mental Health Supported Housing Loans – Funds authorized to be used to increase the supply of safe, sanitary housing to assist in the rehabilitation of persons experiencing behavioral health disorders, including drug and alcohol addiction.

Assigned for Grants and Partnerships – Funds authorized and budgeted for specific grants, project expenditures, and collaborative programs in the fiscal year 2023.

Assigned for Emerging Needs – Funds budgeted by MHB for grants, project expenditures, and collaborative programs in the fiscal year 2023 which have not yet been assigned for specific agencies/projects.

Assigned for Administration – Funds budgeted for administration of projects in fiscal year 2023.

Operating Revenues and Expenses

MHB classifies all operating and nonoperating revenues and expenses in the same manner that individual transactions are classified for cash flow purposes under GASB guidance.

Deferred Outflows/Inflows of Resources

In addition to assets, the statements of net position will periodically report a separate section for deferred outflows of resources. This separate financial statement element, deferred outflows of resources, represents a consumption of net position that applies to a future period(s) and so will not be recognized as an outflow of resources (expense) until then.

In addition to liabilities, the statement of financial position will periodically report a separate section for deferred inflows of resources. This separate financial statement element, deferred inflows of resources, represents an acquisition of net position that applies to a future period(s) and so will not be recognized as an inflow of resources (revenue) until that time.

Adoption of New Accounting Standards:

In June 2017, the Governmental Accounting Standards Board (GASB) issued GASB Statement No. 87, *Leases*. This standard requires the recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and as inflows of resources or outflows of resources recognized based on the payment provisions of the contract. It establishes a single model for lease accounting based on the foundational principle that leases are financings of the right to use an underlying asset. Under this standard, a lessee is required to recognize a lease liability and an intangible right-to-use lease asset, and a lessor is required to recognize a lease receivable and a deferred inflow of resources.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Reclassifications

MHB adopted the requirements of the GASB Statement No. 87 guidance effective July 1, 2021, and has applied the provisions of this standard to the beginning of the earliest comparative period presented.

Certain accounts in the prior year financial statements have been reclassified for comparative purposes to conform with the presentation in the current year financial statements. Total net position and net income are unchanged due to these reclassifications.

NOTE 2 FAIR VALUE MEASUREMENTS

The following table presents the fair value measurements of investments recognized in the accompanying statements of net position measured at fair value on a recurring basis and the level within the fair value hierarchy in which the fair value measurements are categorized at June 30, 2022 and 2021:

		2022			
		Level 1	Level 2	Level 3	Total
Investments:					
U.S. Treasuries	-	473,983	-	\$	473,983
Agency Securities	\$ -	\$ 6,564,632	\$ -	\$	6,564,632
Certificates of Deposit	-	5,643,087	-		5,643,087
Total Investments at Fair Value	\$ -	\$ 12,681,702	\$ -	\$	12,681,702
		2021			
		Level 1	Level 2	Level 3	Total
Investments:					
Agency Securities	\$ -	\$ 3,727,996	\$ -	\$	3,727,996
Certificates of Deposit	-	9,970,687	-		9,970,687
Total Investments at Fair Value	\$ -	\$ 13,698,683	\$ -	\$	13,698,683

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 3 CASH AND CASH EQUIVALENTS AND INVESTMENTS

Cash and cash equivalents and investments at June 30, 2022 and 2021 consisted of the following:

Included in the accompanying statements of net position as:

	2022	2021
Cash and Cash Equivalents	\$ 11,787,828	\$ 5,338,948
Investments - Current	4,656,006	7,635,519
Investments - Noncurrent	8,025,696	6,063,164
Total Cash and Cash Equivalents and Investments	<u>\$ 24,469,530</u>	<u>\$ 19,037,631</u>

Maturities of debt securities at June 30 are as follows:

	2022		2021	
	Cost	Fair Value	Cost	Fair Value
One Year or Less	\$ 4,755,566	\$ 4,656,006	\$ 7,630,771	\$ 7,635,519
After One Through Five Years	8,310,821	8,025,696	6,036,743	6,063,164
Total	<u>\$ 13,066,387</u>	<u>\$ 12,681,702</u>	<u>\$ 13,667,514</u>	<u>\$ 13,698,683</u>

Credit ratings of debt securities at June 30, 2022 are as follows:

	AAA	AA	A	BBB	Unrated
U.S. Treasuries	\$ -	\$ -	\$ -	\$ -	\$ 473,983
Agency Securities	-	6,564,632	-	-	-
Certificates of Deposit	-	-	-	-	5,643,087
Total Debt Securities	<u>\$ -</u>	<u>\$ 6,564,632</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 6,117,070</u>

Credit ratings of debt securities at June 30, 2021 are as follows:

	AAA	AA	A	BBB	Unrated
Agency Securities	\$ -	\$ 3,727,996	\$ -	\$ -	\$ -
Certificates of Deposit	-	-	-	-	9,970,687
Total Debt Securities	<u>\$ -</u>	<u>\$ 3,727,996</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 9,970,687</u>

Investment income for the years ended June 30 is as follows:

	2022	2021
Interest and Dividend Income, Net of Fees	\$ 225,188	\$ 307,302
Unrealized Gain(Loss)	(493,899)	(265,582)
Total Investment Return, Net of Fees	<u>\$ (268,711)</u>	<u>\$ 41,720</u>

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 4 MENTAL HEALTH SUPPORTED HOUSING LOANS RECEIVABLE

MHB maintains a Housing Acquisition Initiative (Housing Project) in order to increase the quality and quantity of housing available for persons with serious mental illness and those completing substance abuse treatment who need subsidized housing. During the fiscal year ended June 30, 2022, fifteen projects were supported from the funds allocated by MHB for the Housing Project. As a part of the Housing Project, MHB committed to provide 10-year forgivable loans to the Agencies. In 2022 and 2021, loans made to the Agencies amounted to \$-0- and \$1,250,000, respectively. The proceeds of these loans were used to finance renovation and improvement of residential properties, which are owned by the Agencies, into affordable housing for the mentally ill. Housing loans outstanding as of June 30, 2022 and 2021 totaled \$2,276,486 and \$2,482,603, respectively.

On each anniversary of the loans, one tenth of the outstanding principal balance, plus all accrued interest at 4%, will be forgiven. Also, upon the maturity date of the loan, the remaining principal balance and accrued interest shall be deemed satisfied and discharged. The loans mature through July 2033.

During 2022 and 2021, \$196,119 and \$148,271 were forgiven on mental health supported housing loans receivable, respectively.

NOTE 5 CAPITAL ASSETS

Capital asset activity for the year ended June 30, 2022 is as follows:

	Beginning Balances	Increases	Decreases	Ending Balances
Furniture and Equipment	\$ 22,997		\$ (1,330)	\$ 21,667
Leasehold Improvement	9,055	-	-	9,055
Software	116,927	5,900		122,827
Less: Accumulated Depreciation and Amortization	(24,169)	(33,215)	1,330	(56,054)
Total Capital Assets, Net.	<u>\$ 124,810</u>	<u>\$ (27,315)</u>	<u>\$ -</u>	<u>\$ 97,495</u>

Capital asset activity for the year ended June 30, 2021 is as follows:

	Beginning Balances	Increases	Decreases	Ending Balances
Furniture and Equipment	\$ 27,861	\$ 10,045	\$ (14,909)	\$ 22,997
Leasehold Improvement	9,055	-	-	9,055
Software	88,995	70,932	(43,000)	116,927
Less: Accumulated Depreciation and Amortization	(61,250)	(19,361)	56,442	(24,169)
Total Capital Assets, Net.	<u>\$ 64,661</u>	<u>\$ 61,616</u>	<u>\$ (1,467)</u>	<u>\$ 124,810</u>

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 6 LEASES

MHB leases equipment as well as an office facility for various terms under long-term, non-cancelable lease agreements. The leases expire at various dates through the fiscal year-end 2025.

Activity on the right of use assets for the year ended June 30, 2022, is as follows:

	2021 (as restated)	Additions	Deductions	2022
Right of Use Asset - Equipment	\$ 14,385	\$ -	\$ -	\$ 14,385
Right of Use Asset - Buildings	212,801	-	-	212,801
Less: accumulated amortization	(72,085)	(72,086)	-	(144,171)
Total Right of Use Assets	<u>\$ 155,101</u>	<u>\$ (72,086)</u>	<u>\$ -</u>	<u>\$ 83,015</u>

Activity on the right of use assets for the year ended June 30, 2021, is as follows:

	2020	Additions	Deductions	2021 (as restated)
Right of Use Asset - Equipment	\$ -	\$ 14,385	\$ -	\$ 14,385
Right of Use Asset - Buildings	-	212,801	-	212,801
Less: accumulated amortization	-	(72,085)	-	(72,085)
Total Right of Use Assets	<u>\$ -</u>	<u>\$ 155,101</u>	<u>\$ -</u>	<u>\$ 155,101</u>

Total future minimum lease payments under lease agreements are as follows:

<u>Year Ending June 30,</u>	<u>Principal</u>	<u>Interest</u>	<u>Total</u>
2023	\$ 70,937	\$ 85	\$ 71,022
2024	11,805	2	11,807
2025	239	-	239
Total minimum lease payments	<u>\$ 82,981</u>	<u>\$ 87</u>	<u>\$ 83,068</u>

NOTE 7 COMMITMENTS AND CONTINGENCIES

Financial awards from the federal government in the form of grants are subject to special oversights and audits. These audits could result in claims against MHB for disallowed costs. No provisions have been made for any liabilities that may result from such audits since the amounts, if any, cannot be determined.

MHB has committed \$13,361,184 to fund programs and service contracts with various organizations for fiscal year 2023. The Board of Trustees of MHB approved the commitments during fiscal year 2022 board meetings. The payments to the organizations are contingent on the services being performed.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 8 PENSION PLAN

Plan Description

MHB contributes to the Employees Retirement System of the City of St. Louis (the Plan) which is a cost-sharing multiemployer defined benefit retirement plan. The Plan is administered by a separate board of trustees, members of which are appointed by City officials and Plan participants. All nonuniformed employees of the City and certain other public entities funded by or providing services to residents of the City become members of the Plan upon employment with the exception of employees hired after attaining age 60.

The Plan issues a publicly available annual report that includes financial statistics, an actuarial valuation, and the required supplementary information. That report may be obtained by writing to the City of St. Louis Employees' Retirement System, Room 900, 1114 Market St., St. Louis, Missouri 63101.

Benefits

The Plan provides for defined benefit payments for retirement, death, or disability to eligible employees or their beneficiaries based upon creditable service, final average compensation, and a benefit compensation base.

Contributions

The Plan's funding policy provides for periodic employer contributions at actuarially determined rates that, expressed as percentages of annual covered payroll, are sufficient to accumulate assets to pay benefits due. If contributions are necessary, level percentage of payroll employer contribution rates are determined using the projected unit credit actuarial cost method. Employer contribution rates are established annually by the board of trustees of the Plan based on an actuarial study. MHB's actuarially determined contribution rates for the years ended June 30, 2022 and 2021 were 15.34% and 13.11% of covered payroll, respectively. The actuarially determined contribution rate is calculated based on the actuarial valuation at the beginning of the plan year. MHB's contributions to the Plan for the years ended June 30, 2022 and 2021 were \$121,508 and \$122,574, respectively.

Pension Liabilities, Pension Expense, Deferred Outflows of Resources, and Deferred Inflows of Resources Related to Pensions

At June 30, 2022 and 2021, MHB reported a liability of \$672,392 and \$1,018,363, respectively, for its proportionate share of the net pension liability. The net pension liability was measured as of September 30, 2021 and 2020, respectively, and the total pension liability used to calculate the net pension liability was determined by actuarial valuations as of October 1, 2020 and 2019, respectively. MHB's proportion of the net pension liability was based on a projection of MHB's long-term share of contributions to the pension plan relative to the projected contributions of all participating employers, actuarially determined. At September 30, 2021 and 2020, MHB's proportion was 0.38666% and 0.35879%, respectively.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 8 PENSION PLAN (CONTINUED)

Pension Liabilities, Pension Expense, Deferred Outflows of Resources, and Deferred Inflows of Resources Related to Pensions (Continued)

For the year ended June 30, 2022, MHB recognized pension expense of \$207,665. At June 30, 2022, MHB reported deferred outflows of resources and deferred inflows of resources related to pensions from the following sources:

	Deferred Outflows of Resources	Deferred Inflows of Resources
Difference Between Expected and Actual Experience	\$ 8,154	\$ 11,561
Changes of Assumptions	58,458	-
Net Difference Between Projected and Actual Earnings on Pension Plan Investments	-	205,688
Changes in Proportion	53,175	-
MHB Contributions Subsequent to the Measurement Date	84,399	-
Total	<u>\$ 204,186</u>	<u>\$ 217,249</u>

For the year ended June 30, 2021, MHB recognized pension expense of \$220,824. At June 30, 2021, MHB reported deferred outflows of resources and deferred inflows of resources related to pensions from the following sources:

	Deferred Outflows of Resources	Deferred Inflows of Resources
Difference Between Expected and Actual Experience	\$ 15,986	\$ -
Changes of Assumptions	108,489	-
Net Difference Between Projected and Actual Earnings on Pension Plan Investments	-	-
Changes in Proportion	147,673	-
MHB Contributions Subsequent to the Measurement Date	57,184	-
Total	<u>\$ 89,733</u>	<u>\$ -</u>
	<u>\$ 419,065</u>	<u>\$ -</u>

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 8 PENSION PLAN (CONTINUED)

The 2022 amount of \$84,399 of deferred outflows of resources resulting from MHB's contributions subsequent to the September 30, 2021 measurement date will be recognized as a reduction of the net pension liability in the year ending June 30, 2023. The \$89,733 of deferred outflows of resources resulting from MHB's contributions subsequent to the September 30, 2020 measurement date was recognized as a reduction of the net pension liability in the year ended June 30, 2022. Other amounts reported as deferred outflows of resources and deferred inflows of resources will be recognized in pension expense as follows:

<u>Year Ending June 30,</u>	<u>Amount</u>
2023	\$ 72,405
2024	(17,311)
2025	(70,449)
2026	(82,107)
Total	<u>\$ (97,462)</u>

Actuarial Assumptions

The total pension liability in the September 30, 2021 actuarial valuation was determined using the following actuarial assumptions, applied to all periods included in the measurement:

Valuation Date	October 1, 2020 for the year ended September 30, 2021, and October 1, 2019 for the year ended September 30, 2020
Timing	Actuarially determined contributions rates are calculated based on the actuarial valuation at the beginning of the plan year.
Actuarial Cost Method	Entry age normal cost method
Asset Valuation Method	5-year smoothing
Amortization Method	Fixed 20-year period as of October 1, 2015 as a level percentage of payroll. Future gains and losses and changes in actuarial assumptions will be amortized in layers over separate 20-year periods.
Discount Rate	7.25%
Inflation	2.50%
Salary Increases	3.00% plus merit component based on years of service
Mortality (Active)	135% of the Pub-2010 General Employee Below-Median Income Weighted mortality for males and 155% for females projected with generational mortality improvements from 2010 using Scale MP-2019
Mortality (Healthy)	125% of the Pub-2010 General Retiree Below-Median Income Weighted mortality for males and 120% for females projected with generational mortality improvements from 2010 using Scale MP-2019
Mortality (Disabled)	120% of the Pub-2010 Non-Safety Disabled Retiree mortality for males and 110% for females projected with generational mortality improvements from 2010 using Scale MP-2019

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 8 PENSION PLAN (CONTINUED)

The target allocation and best estimate of arithmetic real rate of return on Plan investments for each major asset class are summarized in the following table:

<u>Asset Class</u>	<u>Target Allocation</u>	<u>Long-Term Expected Real Rate of Return</u>
Large Cap	25.00 %	7.27 %
Mid Cap	7.50	7.60
Small Cap	7.50	7.90
International Large Cap	12.00	7.47
Emerging Markets	3.00	8.10
Bank Loans	5.00	6.10
Fixed Income	10.00	3.30
International Fixed Income	5.00	5.80
Core Real Estate	10.00	6.60
Infrastructure	5.00	7.50
Private Equity	5.00	10.80
Hedge Funds	5.00	6.70
Total	<u>100.00 %</u>	

Discount Rate and Other Key Assumptions for Total Pension Liability

The discount rate used to measure the total pension liability was 7.25% as of September 30, 2021 and 2020. The projection of cash flows used to determine the discount rate assumed that contributions from Plan members will be made at the current contribution rate. Based on these assumptions, the Plan's net position was projected to be available to make all projected future benefit payments of current Plan members. Therefore, the long-term expected rate of return on the Plan investments was applied to all periods of projected benefit payments to determine the total pension liability. The long-term expected rate of return was determined net of investment expenses but without reduction for administrative expenses at 7.25%. Inflation assumed to be 2.5%. Bond Yield assumed to be 2.26%.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 8 PENSION PLAN (CONTINUED)

Sensitivity of MHB's Proportionate Share of the Net Pension Liability to Changes in the Discount Rate

The following presents MHB's proportionate share of the net pension liability for September 30, 2021 and 2020 calculated using an assumed long-term expected rate of return of 7.25% as well as what MHB's proportionate share of the net pension liability would be if it were calculated using a discount rate that is 1% lower or 1% higher than the current rate:

		September 30, 2021		
		One Percent Decrease 6.25%	Discount Rate 7.25%	One Percent Increase 8.25%
MHB's Proportionate Share of Net Pension Liability		<u>\$ 1,098,338</u>	<u>\$ 672,393</u>	<u>\$ 309,823</u>
		September 30, 2020		
		One Percent Decrease 6.25%	Discount Rate 7.25%	One Percent Increase 8.25%
MHB's Proportionate Share of Net Pension Liability		<u>\$ 1,412,387</u>	<u>\$ 1,018,363</u>	<u>\$ 683,074</u>

NOTE 9 FUNDING

Major funding for MHB is from tax revenues received from a tax levy that authorizes maximum rates of \$0.09 and \$0.2443 per \$100 for the MHF and the CCSF, respectively, of assessed valuation of all taxable personal property, real estate, and manufacturing properties in the City of St. Louis.

Taxes are levied annually in November based on the assessed valuation of all real and personal property located in the City as of the previous January 1 and use is first permitted the following fiscal year.

The actual set rates sometimes differ from the maximum allowed due to deductions, exemptions, and other valuation adjustments. As such, tax levy rates of \$0.0872 and \$0.1843, respectively, for MHF and CCSF were established for fiscal year 2021. For fiscal year 2022 the rates were \$0.0888 for MHF and \$0.2443 for CCSF.

Taxes are billed in November and are due and collectible December 31. All unpaid taxes become delinquent on January 1 of the following year and attach as an enforceable lien on the related party at that time.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 9 FUNDING (CONTINUED)

The City collects the property tax and remits it to MHB. Tax revenues for the years ended June 30 were as follows:

	2022	2021
Real Estate Tax	\$ 12,162,713	\$ 9,827,730
Personal Property Tax	2,957,446	2,402,318
Total Property Tax	15,120,159	12,230,048
Manufacturing and Other Taxes	1,130,378	858,443
Total	<u>\$ 16,250,537</u>	<u>\$ 13,088,491</u>

NOTE 10 UNRESTRICTED NET POSITION

The components of unrestricted net position at June 30 are as follows:

	2022	2021
	<i>(In Thousands)</i>	
Assigned for Grants and Partnerships	\$ 13,361	\$ 11,380
Nonspendable Forgivable Loans for Mental Health		
Supported Housing	2,276	2,483
Assigned for:		
Mental Health Supported Housing Loans	500	500
Emerging Needs	1,171	250
Administration	1,031	1,005
Unreserved, Unassigned	7,239	5,512
Total Unrestricted Net Position	<u>\$ 25,578</u>	<u>\$ 21,130</u>

NOTE 11 TAX ABATEMENTS

Tax abatements, as defined by Governmental Accounting Standards Board (GASB) Statement No. 77, *Tax Abatement Disclosures (GASB 77)*, are agreements between a government and an individual or entity in which the government promises to forgo tax revenues and the individual or entity promises to subsequently take a specific action that contributes to economic development or otherwise benefits the government or its citizens. This Statement requires disclosure of tax abatement information about (1) a reporting government's own tax abatement agreements and (2) those that are entered into by other governments and that reduce the reporting government's tax revenues.

Since MHB does not and has not entered into tax abatement agreements directly with any individuals or entities, the following estimates are from tax abatements entered into by other governments, specifically the City of St. Louis, that has reduced MHB's tax revenues.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 11 TAX ABATEMENTS (CONTINUED)

Tax Abatements Entered into by St. Louis City

MHB's property tax revenues were reduced through the following programs that are utilized by the City of St. Louis. Summaries of those programs are as follows:

Chapter 353 – Residential and Chapter 353 – Commercial: provides tax abatement incentive to improve blighted property, under State Statute Section 353.010-353.190 RSMo, determined by the governing body in the area that is blighted. The Municipality must hold a public hearing and adopt an ordinance approving the Development Plan and may approve the Development Agreement. The property must be transferred to an Urban Redevelopment Corporation for a moment in time. The tax is calculated based on Land assessments based on the year prior to the Urban Redevelopment Corporation transfer.

Chapter 353 – Residential PILOT and Chapter 353 – Commercial PILOT: provides tax abatement incentive to improve blighted property, under State Statute Section 353.010-353.190 RSMo, determined by the governing body in the area that is blighted. The Municipality must hold a public hearing and adopt an ordinance approving the Development Plan and may approve the Development Agreement. The property must be transferred to an Urban Redevelopment Corporation for a moment in time. The amount abated is determined by the amount of Chapter 353 payments in lieu of taxes (PILOTs) established by city ordinance.

Chapter 99 – Residential, Chapter 99 – Residential PILOT, Chapter 99 – Commercial, and Chapter 99 – Commercial PILOT: provides tax abatement incentive to improve blighted property and possibly assist in property acquisition and issuance of bonds, under State Statute Sections 99.700 to 99.715 RSMo or Sections 353.010 to 353.190 RSMo; City Ordinance 45977 approved on February 18, 1952. Establishment of a Land Clearance for Redevelopment Authority (LCRA) is required. The abatement is determined by the governing board of the area that is blighted. The LCRA adopts a redevelopment plan and the Municipality must hold public hearing and adopt an ordinance approving the redevelopment plan. Abatement goes into effect through either title transfer or affidavit. The tax is calculated based on assessment of land at predeveloped level.

Chapter 100 – Planned Industrial Expansion (PIE): provides tax abatement incentive to improve blighted property and possibly assist in property acquisition and issuance of bonds, under State Statute Sections 353.010 to 353.190 RSMo; City Ordinance 54788 approved on December 11, 1967. Establishment of a Land Clearance for Redevelopment Authority (LCRA) is required. The abatement is determined by the governing board of the area that is blighted. The LCRA adopts a redevelopment plan and the Municipality must hold public hearing and adopt an ordinance approving the redevelopment plan. Abatement goes into effect through either title transfer or affidavit. The tax is calculated based on Land assessments based on the year prior to the transfer.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 11 TAX ABATEMENTS (CONTINUED)

Tax Abatements Entered into by St. Louis City (Continued)

Enhanced Enterprise Zone Tax Incentives and Enhanced Enterprise Zone Tax Incentives PILOT: provides tax credits and/or real estate tax abatement to new or expanding businesses in the Enhanced Enterprise Zone, under State Statute Sections 135.950 to 135.973, RSMo and City Ordinance 67350 approved on December 11, 2006. An Enhanced Enterprise Zone Board (EEZB) is established by the governing body, the EEZB then recommends a project to the governing body. The governing body then adopts a resolution authorizing the project/abatement. The EEZB enters into a redevelopment agreement with the redeveloper. The City authorizing resolution shall specify the percent of the exemption to be granted, the duration of the exemption to be granted, and the political subdivisions to which such exemption is to apply, and any other terms, conditions or stipulations otherwise required.

Industrial Revenue Bonds/Merchants & Manufacturer's Tax Credit: provides tax abatement incentive to provide economic development benefits to municipality for Personal and/or Real Property taxes, under State Statute Sections 100.010 to 100.200 RSMo. Abatements are obtained through preparation and approval of an Industrial Development Plan by the governing body of the municipality. The tax is abated by transferring the title of the real or personal property to be abated to the tax-exempt governmental body.

Missouri's Real Property Tax Increment Allocation Redevelopment Act enables cities to finance certain redevelopment costs with the revenue generated from (i) payments in lieu of real estate taxes, as measured by the net increase in assessed valuation resulting from redevelopment, and (ii) a portion of the increase in other local tax revenue associated with new economic activity. When a tax increment financing (TIF) plan is adopted, real estate taxes in the redevelopment are frozen at their current level. By applying the real estate tax rate of all taxing districts having taxing power within the redevelopment area to the increased assessed valuation resulting from redevelopment, a tax "increment" is produced. The real estate tax increments are referred to as payments in lieu of taxes, or PILOTs, and are deposited in a special allocation fund.

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 11 TAX ABATEMENTS (CONTINUED)

Tax Abatements Entered into by St. Louis City (Continued)

The amount of MHB's tax revenues calculated at MHB's tax rate of \$.0872 per \$100 and CCSF's tax rate of \$.2443 per \$100 of assessed value that were abated by St. Louis City are reported in the following table for the year ended June 30, 2022.

	June 30, 2022	
	Gross Dollar of Reduced Tax Revenues	MHB Reduced Tax Revenues
Chapter 353 Residential	\$ 2,279,784	\$ 91,559
Chapter 353 Residential PILOT	2,843,445	114,197
Chapter 353 Commercial	3,711,700	124,359
Chapter 353 Commercial PILOT	2,447,231	81,993
Chapter 99 Residential	5,609,417	225,282
Chapter 99 Residential PILOT	568,108	22,816
Chapter 99 Commercial	4,134,727	138,532
Chapter 99 Commercial PILOT	402,823	13,496
Chapter 100 - Planned Industrial Expansion Authority	178,808	5,991
Enhanced Enterprise Zone	454,104	15,215
Enhanced Enterprise Zone PILOT	239,727	8,032
Industrial Revenue Bond Transactions - Earnings Tax Incentive Credits	2,388,479	-
Industrial Revenue Bond Transactions - Real Property	173,851	6,982
Industrial Revenue Bond Transactions - Personal Property	3,347,529	159,296
Tax Increment Financing PILOT	24,966,691	1,022,934
Tax Increment Financing (EATS)	11,354,788	-
	<u>\$ 65,101,212</u>	<u>\$ 2,030,684</u>

CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO FINANCIAL STATEMENTS
JUNE 30, 2022 AND 2021

NOTE 11 TAX ABATEMENTS (CONTINUED)

Tax Abatements Entered into by St. Louis City (Continued)

The amount of MHB's tax revenues calculated at MHF's tax rate of \$.0872 per \$100 and CCSF's tax rate of \$.1843 per \$100 of assessed value that were abated by St. Louis City are reported in the following table for the year ended June 30, 2021.

	June 30, 2021	
	Gross Dollar of Reduced Tax Revenues	MHB Reduced Tax Revenues
Chapter 353 - Residential	\$ 3,675,048	\$ 121,826
Chapter 353 - Residential PILOT	1,944,444	64,457
Chapter 353 - Commercial	6,206,356	171,413
Chapter 353 - Commercial PILOT	1,828,978	50,514
Chapter 99 - Residential	4,470,841	148,206
Chapter 99 - Residential PILOT	243,743	8,080
Chapter 99 - Commercial	4,273,460	118,029
Chapter 99 - Commercial PILOT	247,603	6,839
Chapter 100 - Planned Industrial Expansion Authority	197,390	5,452
Enhanced Enterprise Zone	580,110	16,022
Enhanced Enterprise Zone PILOT	694,907	19,193
Industrial Revenue Bond Transactions - Earnings Tax Incentive Credits	1,956,699	-
Industrial Revenue Bond Transactions - Real Property	231,040	7,659
Industrial Revenue Bond Transactions - Personal Property	2,754,431	108,345
Tax Increment Financing PILOT	29,927,771	1,012,371
Tax Increment Financing (EATS)	9,701,058	-
	<u>\$ 68,933,879</u>	<u>\$ 1,858,406</u>

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
SCHEDULES OF SELECTED PENSION INFORMATION –
EMPLOYEES RETIREMENT SYSTEM OF THE CITY OF ST. LOUIS
JUNE 30, 2022 AND 2021
(SEE INDEPENDENT AUDITORS' REPORT)**

Schedule of the Trustees' Proportionate Share of the Net Pension Liability

	2021	2020	2019	2018	September 30, 2017	2016	2015	2014
MHB's Proportion Percentage of the Net Pension Liability	0.3867 %	0.3588 %	0.3357 %	0.2877 %	0.2894 %	0.2810 %	0.2649 %	0.2399 %
MHB's Proportionate Share of the Net Pension Liability	\$ 672,393	\$ 1,018,363	\$ 730,687	\$ 486,669	\$ 502,750	\$ 587,960	\$ 601,622	\$ 370,851
MHB's Covered Payroll	\$ 926,368	\$ 881,731	\$ 812,250	\$ 693,975	\$ 698,050	\$ 670,441	\$ 661,337	\$ 583,862
MHB's Proportionate Share of the Net Pension Liability as a Percentage of MHB's Covered Payroll	72.6 %	115.5 %	90.0 %	70.1 %	72.0 %	87.7 %	91.0 %	64.0 %
Plan's Fiduciary Net Position as a Percentage of Total Pension Liability	84.1 %	73.8 %	78.6 %	83.0 %	82.5 %	78.5 %	76.2 %	83.5 %

Schedule of the Trustees' Contributions

	2022	2021	2020	2019	June 30, 2018	2017	2016	2015
Required Contribution	\$ 121,508	\$ 122,574	\$ 104,512	\$ 96,192	\$ 83,348	\$ 85,938	\$ 88,585	\$ 93,124
Contribution in Relation to the Required Contribution	\$ 121,508	\$ 122,574	\$ 104,512	\$ 96,192	\$ 83,348	\$ 85,938	\$ 88,585	\$ 93,124
MHB's Covered Payroll	\$ 792,099	\$ 934,966	\$ 858,062	\$ 783,965	\$ 687,121	\$ 691,371	\$ 639,143	\$ 634,450
Contributions as a Percentage of Covered Payroll	15.34 %	13.11 %	12.18 %	12.27 %	12.13 %	12.43 %	13.86 %	14.68 %

Note: Above schedules are intended to show information for 10 years. Additional years will be displayed as they become available.

Changes of Benefit Terms or Assumptions

There were no changes in benefits during the years ended September 30, 2021 and 2020.

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
SCHEDULE OF GRANTS, PARTNERSHIPS, AND
INITIATIVES TO ORGANIZATIONS
YEAR ENDED JUNE 30, 2022
(SEE INDEPENDENT AUDITORS' REPORT)**

<u>Organization</u>	<u>Amount</u>
Alive & Well Communities	\$ 50,000
Area Resources for Community and Human Services	608,323
Behavioral Health Network	230,050
Behavioral Health Response, Inc.	543,696
Better Family Life, Inc.	113,317
Big Brothers Big Sisters of Eastern Missouri, Inc.	265,301
Bilingual International Assistant Services	538,570
Boys & Girls Clubs of Greater St. Louis	159,906
CASA of St. Louis	298,163
Center for Behavioral Health - UMSL	251,597
CHADS Coalition for Mental Health	91,981
Children's Advocacy Services of Greater St. Louis - UMSL	691,844
City of St. Louis Department of Human Services	251,660
22nd Judicial Court of Missouri, Family Court-Juvenile Division	325,121
Covenant House Missouri	404,105
Criminal Justice Ministry	118,346
Employment Connection	185,330
Epworth Children & Family Services, Inc.	174,775
Family Care Health Centers	534,555
FamilyForward	289,138
Fathers and Families Support Center	93,475
Foster and Adoptive Care Coalition	238,937
Gene Slay's Girls & Boys Club of St. Louis	98,090
Generate Health STL	124,997
Girl Scouts of Eastern Missouri, Inc.	32,115
Great Circle	54,178
Healing Action Network	221,303
International Institute of St. Louis	100,884
Kids Win Missouri	5,000
Legal Services of Eastern Missouri, Inc.	505,483
LifeWise STL	208,811
Lutheran Family and Children's Services of Missouri	154,770
Missouri Department of Mental Health	75,000
Nurses for Newborns	286,262
City of St. Louis - Office of the Mayor, Commission on Children, Youth, and Families	55,000
Our Little Haven	286,500
Places for People, Inc.	496,818
Preferred Family Healthcare, Inc.	96,249
PreventEd	92,646
Queen of Peace Center	158,197
Safe Connections	344,730
Saint Louis Crisis Nursery	197,539
Sherwood Forest Camp, Inc.	137,921
St. Francis Community Services	79,491
St. Louis Community Foundation	10,000
St. Louis Public Schools Foundation	24,619
St. Louis City Senior Citizens Services Fund	41,075
United 4 Children	237,096
Unleashing Potential	66,508
Vision for Children at Risk	437,102

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
SCHEDULE OF GRANTS, PARTNERSHIPS, AND
INITIATIVES TO ORGANIZATIONS
YEAR ENDED JUNE 30, 2022
(SEE INDEPENDENT AUDITORS' REPORT)**

<u>Organization</u>	<u>Amount</u>
The Washington University - The SPOT	229,975
Youth in Need	85,885
Youth Pop-Up Events	19,168
Safe Space Programming	25,000
Other Strategic Initiatives	299,730
Total	<u>\$ 11,746,332</u>

DRAFT

**CITY OF ST. LOUIS MENTAL HEALTH
BOARD OF TRUSTEES**

SINGLE AUDIT REPORT

YEAR ENDED JUNE 30, 2022

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**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
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DRAFT

**INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED
IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS***

Board of Trustees
City of St. Louis Mental Health Board of Trustees
St. Louis, Missouri

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the business-type activities of St. Louis Mental Health Board, as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the St. Louis Mental Health Board's basic financial statements, and have issued our report thereon dated REPORT DATE.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered St. Louis Mental Health Board's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of St. Louis Mental Health Board's internal control. Accordingly, we do not express an opinion on the effectiveness of St. Louis Mental Health Board's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that were not identified.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether St. Louis Mental Health Board's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of This Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

CliftonLarsonAllen LLP

St. Louis, Missouri
REPORT DATE

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**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH
MAJOR FEDERAL PROGRAM, REPORT ON INTERNAL CONTROL OVER
COMPLIANCE, AND REPORT ON THE SCHEDULE OF EXPENDITURES
OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE**

Board of Trustees
City of St. Louis Mental Health Board of Trustees
St. Louis, Missouri

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited St. Louis Mental Health Board's compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on each of St. Louis Mental Health Board's major federal programs for the year ended June 30, 2022. St. Louis Mental Health Board's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

In our opinion, St. Louis Mental Health Board complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2022.

Basis for Opinion on Each Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditors' Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of St. Louis Mental Health Board and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of St. Louis Mental Health Board's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules and provisions of contracts or grant agreements applicable to St. Louis Mental Health Board's federal programs.

Auditors' Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on St. Louis Mental Health Board's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about St. Louis Mental Health Board's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance, we:

- exercise professional judgment and maintain professional skepticism throughout the audit.
- identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding St. Louis Mental Health Board's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- obtain an understanding of St. Louis Mental Health Board's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of St. Louis Mental Health Board's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Report on Internal Control Over Compliance

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditors' Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the financial statements of St. Louis Mental Health Board as of and for the year ended June 30, 2022, and have issued our report thereon dated REPORT DATE, which contained an unmodified opinion on those financial statements. Our audit was performed for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the financial statements as a whole.

CliftonLarsonAllen LLP

St. Louis, Missouri
REPORT DATE

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED JUNE 30, 2022**

Section I – Summary of Auditors' Results

Financial Statements

1. Type of auditors' report issued: Unmodified
2. Internal control over financial reporting:
- Material weakness(es) identified? _____ yes x no
 - Significant deficiency(ies) identified? _____ yes x none reported
3. Noncompliance material to financial statements noted? _____ yes x no

Federal Awards

1. Internal control over major federal programs:
- Material weakness(es) identified? _____ yes x no
 - Significant deficiency(ies) identified? _____ yes x none reported
2. Type of auditors' report issued on compliance for major federal programs: Unmodified
3. Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? _____ yes x no

Identification of Major Federal Programs

CFDA Number(s)

93.104

Name of Federal Program or Cluster

Comprehensive Community Mental Health Services for Children with Serious Emotional Disturbances

Dollar threshold used to distinguish between Type A and Type B programs:

\$ 750,000 / \$187,500

Auditee qualified as low-risk auditee?

 x yes _____ no

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)
YEAR ENDED JUNE 30, 2022**

Section II – Financial Statement Findings

Our audit did not disclose any matters required to be reported in accordance with Government Auditing Standards.

Section III – Findings and Questioned Costs – Major Federal Programs

Our audit did not disclose any matters required to be reported in accordance with 2 CFR 200.516(a).

DRAFT

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED JUNE 30, 2022**

Federal Grantor/Pass-Through Grantor/ Program or Cluster Title	Federal Assistance Listing Number	Pass-Through Entity Identifying Number	Passed Through To Subrecipients	Federal Expenditures
Department of Treasury				
Coronavirus State and Local Fiscal Recovery Funds	21.027	N/A	\$ -	\$ 64,485
Total Department of Treasury			-	64,485
Department of Health and Human Services				
Comprehensive Community Mental Health Services for Children with Serious Emotional Disturbances	93.104	5H79SM082197	973,472	1,126,943
Substance Abuse and Mental Health Service Projects of Regional and National Significance	93.243	N/A		303,789
Total Department of Health and Human Services			973,472	1,430,732
Department of Housing and Urban Development				
Continuum of Care Homeless Services	14.267	N/A	-	(51,697)
Total Department of Housing and Urban Development			-	(51,697)
Total Expenditures of Federal Awards			\$ 973,472	\$ 1,443,520

DRAFT

See accompanying Notes to Schedule of Expenditures of Federal Awards.

**CITY OF ST. LOUIS MENTAL HEALTH BOARD OF TRUSTEES
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED JUNE 30, 2022**

NOTE 1 BASIS OF PRESENTATION

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the City of St. Louis Mental Health Board of Trustees under programs of the federal government for the fiscal year ended June 30, 2022. The information in this Schedule is presented in accordance with the requirements of *Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirement, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of the entity, it is not intended to and does not present the financial position, changes in net position, or cash flows of the entity.

The Schedule designates federal awards as direct and pass through. Direct awards represent federal funding awarded directly to the entity by a federal agency, pass-through awards are federal awards passed through a nonfederal entity. Pass-through identifying information is presented when available and when applicable.

NOTE 2 BASIS OF ACCOUNTING

The accompanying schedule of expenditures of federal awards is prepared on the accrual basis of accounting.

NOTE 3 RELATIONSHIP TO BASIC FINANCIAL STATEMENTS

Federal awards included in the accompanying schedule of expenditures of federal awards are reported as operating grants in MHB's basic financial statements.

NOTE 4 INDIRECT COST

MHB has elected to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance for all programs except the Coronavirus Relief Funds.



ORGANIZATIONAL CHART
Effective December 1, 2022

