

## AGENDA

### MEETING OF THE OPERATIONS OVERSIGHT COMMITTEE and BOARD OF RETIREMENT\*

#### LOS ANGELES COUNTY EMPLOYEES RETIREMENT ASSOCIATION

300 NORTH LAKE AVENUE, SUITE 810  
PASADENA, CA 91101

THURSDAY, JULY 14, 2016 - 9:00 A.M.\*\*

*The Committee may take action on any item on the agenda,  
and agenda items may be taken out of order.*

#### COMMITTEE MEMBERS:

Joseph Kelly, Chair  
Yves Chery, Vice Chair  
Anthony Bravo  
Ronald Okum  
David Muir, Alternate

#### I. APPROVAL OF THE MINUTES

A. Approval of the minutes of the regular meeting of June 9, 2016

#### II. PUBLIC COMMENT

#### III. ACTION ITEMS

A. Recommendation as submitted by JJ Popowich, Assistant Executive Officer: That the Committee recommend the Board of Retirement approve the "Policy for Processing Correspondence Addressed to Board of Retirement Members." (Memorandum dated July 1, 2016)

B. Recommendation as submitted by James Beasley, Administrative Services Analyst: That the Committee recommend the Board of Retirement approve the Records and Information Management (RIM) Policy dated July 1, 2016. (Memorandum dated July 1, 2016)

#### IV. FOR INFORMATION

A. LACERA Operations Briefing  
Robert Hill/JJ Popowich

July 14, 2016

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V. GOOD OF THE ORDER

(For information purposes only)

VI. ADJOURNMENT

**\*The Board of Retirement has adopted a policy permitting any member of the Board to attend a standing committee meeting open to the public. In the event five or more members of the Board of Retirement (including members appointed to the Committee) are in attendance, the meeting shall constitute a joint meeting of the Committee and the Board of Retirement. Members of the Board of Retirement who are not members of the Committee may attend and participate in a meeting of a Board Committee but may not vote on any matter discussed at the meeting. The only action the Committee may take at the meeting is approval of a recommendation to take further action at a subsequent meeting of the Board.**

**\*\*Although the meeting is scheduled for 9:00 a.m., it can start anytime thereafter, depending on the length of the Board of Retirement meeting preceding it. Please be on call.**

**Any documents subject to public disclosure that relate to an agenda item for an open session of the Committee, that are distributed to members of the Committee less than 72 hours prior to the meeting, will be available for public inspection at the time they are distributed to a majority of the Committee, at LACERA's offices at 300 North Lake Avenue, Suite 820, Pasadena, California during normal business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday.**

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MINUTES OF THE MEETING OF THE  
OPERATIONS OVERSIGHT COMMITTEE  
and  
BOARD OF RETIREMENT\*

LOS ANGELES COUNTY EMPLOYEES RETIREMENT ASSOCIATION

GATEWAY PLAZA - 300 N. LAKE AVENUE, SUITE 810, PASADENA, CA 91101

THURSDAY, JUNE 9, 2016, 11:55 A.M. – 12:45 P.M.

**COMMITTEE MEMBERS**

PRESENT: Joseph Kelly, Chair  
Yves Chery, Vice Chair  
David L. Muir, Alternate

ABSENT: Anthony Bravo  
Ronald Okum

**ALSO ATTENDING:**

BOARD MEMBERS AT LARGE

Marvin Adams  
William de la Garza  
Shawn R. Kehoe  
Joseph Kelly  
Les Robbins

STAFF, ADVISORS, PARTICIPANTS

Robert Hill	John Nogales
JJ Popowich	James Pu
Carlos Barrios	Steven Rice
Allan Cochran	

The meeting was called to order by Chair Kelly at 11:55 a.m. Due to the absence of Messrs. Bravo and Okum, the Chair announced that Mr. Muir, as the alternate, would be a voting member of the Committee.

I. APPROVAL OF THE MINUTES

A. Approval of the minutes of the special meeting of May 5, 2016

Mr. Chery made a motion, Mr. Kelly seconded, to approve the minutes of the special meeting of May 5, 2016. The motion passed unanimously.

II. PUBLIC COMMENT

III. ACTION ITEMS

- A. Recommendation as submitted by Steven P. Rice, Chief Counsel, and Robert Hill, Assistant Executive Officer: That the Committee forward to the full Board of Retirement, with the Committee's recommendation for approval, the proposed Restated Memorandum of Understanding between the County of Los Angeles Treasurer and Tax Collector and LACERA for the Provision of Collection Services. (Memorandum dated May 31, 2016)

Mr. Kelly recused himself and left the room after making the following statement:

"I would like to disclose that as the Treasurer and Tax Collector for Los Angeles County I have a remote interest for conflict of interest purposes under Government Code Section 1091 in the proposed restated TTC/LACERA MOU. Therefore, I will recuse myself from the discussion and vote on this item and will leave the room while it is being considered. I will pass the gavel to Mr. Chery as Vice Chair to oversee this item."

After Chair Kelly left the room, Mr. Chery, as acting Chair, announced that in the absence of a quorum this item would be pulled and brought directly to the full Board of Retirement in July.

Mr. Kelly returned and resumed his position as Chair.

IV. FOR INFORMATION

- A. LACERA Operations Briefing  
Robert Hill/JJ Popowich

Messrs. Hill and Popowich presented the monthly briefing on LACERA's operations. Many of the items highlighted may recur in subsequent briefings or may result in a future comprehensive OOC presentation.

- Public Records Request Update
- Report of Felony Forfeiture Cases Processed
- DB2 Migration
- Generator Test

IV. FOR INFORMATION (Continued)

B. Quarterly LACERA Diversity Reporting  
John Nogales

John Nogales discussed the importance of having a diversified workforce at LACERA. Human Resources will be reporting to the Committee quarterly with information reflecting LACERA's diversity and the efforts undertaken to further foster diversity at LACERA. He then followed with a presentation covering the what, why, and how of diversity, as well as providing statistical information reflecting LACERA's current ethnicity and general make-up.

C. Member Service Center – Transition Plan to a New Business Model  
Carlos Barrios/Michael Peterson/Vanessa Gonzalez

At their December 2015 meeting the Board of Retirement approved a recommendation to adopt a new business model in the Member Service Center of accommodating an 80% appointment allocation. Mr. Allan Cochran, Member Services Division Manager, introduced Carlos Barrios, who then gave a presentation sharing the progress of the transition to that new business model. The increase in appointments available was phased in over a few months, reaching the goal of 40 appointments per day by the end of February 2016.

V. GOOD OF THE ORDER

(For information purposes only)

VI. ADJOURNMENT


The meeting adjourned at 12:45 p.m.

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July 1, 2016

**TO:** Operations Oversight Committee  
Joseph Kelly, Chair  
Yves Chery, Vice Chair  
Anthony Bravo  
Ronald Okum  
David Muir, Alternate

**FROM:** JJ Popowich   
Assistant Executive Officer

**FOR:** July 14, 2016 Operations Oversight Committee Meeting

**SUBJECT:** **Board Correspondence Processing Policy**

### **RECOMMENDATION**

Recommend the Board of Retirement approve the "Policy for Processing Correspondence Addressed to Board of Retirement Members."

### **INTRODUCTION**

Board of Retirement members occasionally receive LACERA business correspondence from members, the public, or other agencies. Although LACERA has a long standing practice requiring staff to provide the Board member a copy of the correspondence, along with any LACERA generated response, compliance has varied depending on the delivery and internal routing of such correspondence.

Recently a member wrote a benefit related letter addressed to a Board member. The letter was routed to Member Services' Correspondence and responded to by staff. However, despite the current procedures and expectations, the Board member was never sent a copy of the original letter, or the response. The member sent a second letter, addressed to the entire Board, disagreeing with staff's response. A copy of the member's second letter was appropriately sent to the Board, along with a copy of the original response. The Board Chair, Mr. Kehoe, questioned why the first letter, and staff's response, was not sent to the Board member to whom it was addressed.

As a result of this oversight, Mr. Kehoe requested staff draft a policy outlining how staff will process correspondence addressed to Board members. Staff reviewed our internal processes and harmonized the various ways correspondence is handled when it comes into LACERA (e.g. mail, fax, email, physical delivery) to ensure all correspondence addressed to the Board is tracked and handled appropriately.

## **BACKGROUND**

Board members occasionally receive correspondence at LACERA's office. The correspondence generally falls into one of two categories:

- **Member/Survivor Correspondence:** Correspondence written to a Board member asking for assistance with an issue, reporting service compliments or complaints, and sharing their opinion on various topics.
- **Third Party Correspondence:** Correspondence from non-LACERA members.

Correspondence can be defined as a communication addressed to a Board member. This includes mail, faxes, email, and physical letters dropped off at the LACERA offices. In this context, correspondence does not include periodicals, educational materials, invitations, or solicitations.

### **Routing Board Member Correspondence**

There are a number of "intake" methods for correspondence. For example, a letter may be received through the mail. Email may be received by an individual LACERA staff member or, more commonly, through LACERA's [welcome@lacera.com](mailto:welcome@lacera.com) email address. Faxes may be received by the Document Processing Group (DPC) or may be received directly by other areas of LACERA operations (albeit on a very rare occasion). Finally, members may also drop off letters at the Member Service Center.

In most cases, correspondence received is routed through the DPC prior to being distributed physically or electronically to the appropriate division. DPC receives the mail, evaluates where it should be sent, and if it is member related, scans the correspondence into the system for delivery to the staff's electronic member correspondence work queue. However, DPC has special rules for handling mail that is addressed to Board members. If the envelope is addressed to a Board member, it is sent to the Board Secretary unopened. If the envelope is not addressed to a Board member, but the correspondence inside is addressed to a Board member, the letter is again forwarded to the Board Secretary. If the correspondence is not addressed to the Board member but a Board member is copied on the member's letter, it is scanned into the system as member correspondence, sent to the appropriate work group for processing, and the Board member receives a copy of the member correspondence with the staff's reply.

The board secretaries forward Board correspondence marked "personal" or "confidential" directly to the Board member without opening the correspondence. For all other correspondence, the original is sent to an Executive Officer to determine the appropriate response action. The Executive Officer may choose to respond directly,

or may choose to delegate the response. Once the Executive Officer determines how the letter will be handled, a copy is sent to the Board member with a stamp identifying how the correspondence will be handled (e.g. referred to Member Services Correspondence or referred to the Administrative Appeal process, etc.). When the correspondence is addressed to a specific Board member, the response to the member is on the Board member's behalf and a copy of the response is provided to the Board member through the established delivery methods.

Electronic correspondence is forwarded to the Board member electronically. Electronic correspondence received through the [welcome@lacera.com](mailto:welcome@lacera.com) email is routed to the Assistant Executive Officer over Member Services prior to being sent to the Board member. This extra step is required since we do not share the Board member's personal email address with all staff.

### **Member Correspondence Processing**

As previously noted, not all correspondence addressed to a Board member is copied and provided to the Board member. Some correspondence is routine in nature and DPC has discretion (when a letter is not marked "private" or "confidential") to scan and route the request to the appropriate work queue. In some instances, a member may address a routine address change request to a Board member. There is no comment on service, complaint, or opinion to share; the member for some unknown reason decides to address a routine member service request to a Board member.

However, there are times that a member will address LACERA regarding an issue of concern and copy a Board member. Member Services and Retiree Healthcare (the two areas of LACERA that generally handle a majority of member correspondence) will review the member's letter and take appropriate action. This action could be providing additional information to the member, correcting a problem, or addressing a member's appeal.

In this case, Member Services' written procedures require the Board member receive a copy of the response sent to the member. In reviewing the procedures for developing the new policy, it was noted that the policy did not require staff to forward the member's letter to the Board member as well. This oversight has been corrected in the new policy.

Retiree Healthcare has similar procedures. Letters where a member has copied a Board member are addressed, and then a copy of the letter and the response are forwarded to the Board Secretary for distribution to the Board member.

The Legal Office also occasionally receives correspondence directly from a member. Some of these can indicate that a Board member has been copied. In most cases,



Legal will review the correspondence, and if it is not related to an ongoing legal issue (dissolution or pending court case), will forward the letter to the Executive Office. The Executive Office then decides the appropriate handling method and begins the process.

### **Proposed Policy**

Staff understands that transparency regarding member and third party communications with the Board is critical in order for the Board to have proper oversight over the administration of the system. It has always been staff's intention that every Board member receives the correspondence addressed to them, or those that they have been copied on, and a copy of any subsequent response, in a timely manner.

We also recognize it is a good practice to have an organization policy to ensure this expectation is met. The development of the proposed policy involved several divisions throughout LACERA and provided an opportunity to harmonize the internal procedures as well as create a centralized tracking method to ensure adherence to the policy.

At the same time, we feel this proposed policy provided us with an opportunity to address several issues that routinely come up when handling correspondence. The proposed policy clarifies what are considered routine member service requests that can be administered by staff without Board notification. It also provided us with an opportunity to address privacy considerations.

### **Therefore it is recommended your Committee:**

Recommend the Board of Retirement approve the "Policy for Processing Correspondence Addressed to Board of Retirement Members."

REVIEWED AND APPROVED



---

Gregg Rademacher  
Chief Executive Officer

Attachment

## LACERA POLICY STATEMENT

### PROCESSING CORRESPONDENCE ADDRESSED TO BOARD OF RETIREMENT MEMBERS

(Effective September 1, 2016)

#### I. Purpose

The Board of Retirement (Board) has a fiduciary duty to oversee LACERA's operations. In the course of a Board member's duty, he or she may receive correspondence at LACERA from a variety of sources for varying purposes. This correspondence may be addressed and sent directly to a Board member through LACERA or indirectly by means of correspondence directed to a division within LACERA and copied to the Board or Board member(s). Correspondence is defined as physical documents and electronic email.

Board members should have timely access to any correspondence addressed to them directly and should be made aware on a timely basis of any correspondence on which they have been copied.

However, the Board recognizes that not all correspondence addressed or copied to the Board member(s) requires direct action or follow up by Board members themselves. Some correspondence is of routine nature and may not rise to the level of the Board's oversight.

The Board also recognizes that some correspondence may be received directly by the Board member without being processed through LACERA's offices. To the extent that these communications require some action or response from LACERA, the Board members acknowledge the correspondence should be referred to the LACERA Executive Office for processing.

Therefore, the Board sets forth the following directions for the processing of Board addressed correspondence:

#### II. Statement of Policy

1. **Personal and Confidential:** The Board directs staff to promptly forward any correspondence addressed to a Board member, and marked "personal," "confidential," or any variation thereof, directly to the addressed Board member without staff review.
2. **Addressed to Board Member:** The Board directs staff in the Executive Office, including Board and Executive secretaries, to promptly open and review any correspondence addressed to a Board member, but not marked

"personal" or "confidential" or some variation thereof, and determine the appropriate course of action in accordance with this policy. A copy of all such correspondence shall be promptly forwarded to the Board member.

3. **Exception for Routine Account Maintenance Requests:** Not all correspondence addressed to a Board member requires Board member oversight. In many cases, members will send routine account maintenance requests (i.e. address changes, direct deposit changes, disability applications, medical enrollment requests, etc.), to a Board member's attention. This type of correspondence shall not be forwarded to the Board member.
4. **Response to Correspondence:** The Board directs staff who are assigned the responsibility of responding to the correspondence on the Board's behalf, to promptly provide a copy of the completed response to the Board member.
5. **Privacy Considerations:** Members, survivors, and others corresponding with LACERA may choose to provide Personal Information (PI) and Personal Health Information (PHI) in their correspondence. In an effort to protect member data, all letter copies provided to Board members (with the exception of those not reviewed as specified under Section 1 above) shall have any PI or PHI information redacted from the copy of such correspondence and the copy of the response.
6. **Board Members Receiving Correspondence Directly Requiring LACERA Action:** Board members may receive correspondence directly without being processed through LACERA or correspondence labeled "personal" or "confidential" that was processed by LACERA but not reviewed by staff (as specified under Section 1 of this policy) which requires some action or response from LACERA. In these cases the Board member should refer the correspondence to the LACERA Executive Office for processing by the appropriate staff.

### III. Implementation

The policy is established pursuant to the Board of Retirement's fiduciary responsibility to prudently administer the retirement plan in accordance with the County Employees Retirement Law of 1937, the Public Employees' Pension Reform Act of 2013, the California Constitution, and other applicable laws. This policy may be modified in the future by Board of Retirement action. This policy shall be effective immediately upon adoption by the Board.

Adopted:



July 1, 2016

**TO:** Operations Oversight Committee  
Joseph Kelly, Chair  
Yves Chery, Vice Chair  
Anthony Bravo  
Ronald Okum  
David Muir, Alternate

**FROM:** James Beasley   
Administrative Services Analyst III

**FOR:** Operations Oversight Committee Meeting - July 14, 2016

**SUBJECT: Records and Information Management Policy**

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#### **RECOMMENDATION**

**That the Operations Oversight Committee recommends the Board of Retirement approve the Records and Information Management (RIM) Policy dated July 1, 2016.**

#### **EXECUTIVE SUMMARY**

LACERA's information and records are vital assets for ongoing operations and historical documentation of business decisions, activities, and transactions. Accordingly, LACERA's Administrative Services Division documented and published a Records Retention Policy and Schedule, which was approved by the Board of Retirement in 2008.

Since 2008, as the information age has advanced, records and information sharing practices have taken on added significance in today's global environment. Records provide crucial internal information that support business operations and historical reference materials necessary for management decisions. An adequate retention and access is necessary to the organization's ability to communicate efficiently across divisions in order to support and protect LACERA members. Faced with these needs and a steadily increasing number of changes to the complexity of legal requirements regarding records management, it is important that LACERA address the issue of records management in an orchestrated manner.

Administrative Services' Records and Information Management (RIM) Unit reviewed the organization's current records retention policy to test our current practices to verify alignment with current industry best practices. Based on our research, we

**Records and Information Management Policy**  
**Operations Oversight Committee**  
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determined that a records retention policy should be comprehensive and should provide governance that addresses privacy and security, records ownership, roles and responsibilities, the record's lifecycle, legal holds, training, maintenance, and audits.

Based on this review LACERA's RIM Unit created a new Records and Information Management (RIM) Policy for the Operations Oversight Committee's consideration. The new RIM Policy includes recommendations from Internal Audit, industry best practices, and the Legal Office has reviewed and approved the form and content. Attached is a copy of the Records Retention Policy and Schedule (2008) for comparison to the changes within the new RIM Policy.

### **DISCUSSION**

The Administrative Services' RIM Unit has completed its project to reengineer to manage records consistently and effectively. The proposed RIM Policy addresses areas directly affecting the accuracy, efficiency, and effectiveness of business processes throughout the organization.

Legal requirements governing records management continue to evolve. It is paramount the organization follow industry best practices to ensure compliance and operating efficiency. Staff completed a review of "best practices" from a variety of government and private sources. This review included historical research into the development of these best practices and trend analysis of the most common elements included in policies from:

- Los Angeles County
- Governmental Agencies including various 37 Act Retirement Systems
- Record retention requirements as prescribed by local, state and federal regulations
- Association of Records Managers and Administrators (ARMA International) – ARMA is an international association that focuses on education for best practices, legal statutes, and methodologies specific to records information management.

The proposed RIM Policy provides enhancements in the following areas:

- **Compliance:** Staff added more stringent compliance guidelines in order to mitigate the legal risk and exposure to LACERA. This includes:

**Records and Information Management Policy**  
**Operations Oversight Committee**  
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- Clearly defining the roles and responsibilities of management, staff, and the RIM Unit, while maintaining accountability to achieve compliance.
- **Records Retention Schedule:** Make the retention schedule separate from the Policy in order to enhance staff's ability to regularly update or make changes to the schedule for legal compliance.
- **Inventory and Schedule Maintenance:** The new RIM Policy includes a revised Records Inventory and Maintenance schedule. This includes new procedures to oversee records maintenance such as a quarterly records purge. The new procedures are written to facilitate staff's compliance and will mitigate organizational risk by:
  - Reducing LACERA's legal exposure due to non-compliance with federal regulations on records management.
  - Limiting the amount of hard copy materials taking up valuable office space by freeing up additional space that can be utilized more efficiently.
  - Improve record safeguarding in the event of a disaster.
- **Training:** The enhanced training curriculum includes a discussion regarding the importance of records management and the risks associated with poor records management. Providing well defined training to all Records Coordinators and Management will ensure they receive consistent guidance on the new procedures and their roles and responsibilities.

**SUMMARY**

The new RIM Policy is critical to establishing an effective records retention program. We believe the new RIM Policy provides greater consistency in records retention practices throughout the organization. The new RIM Policy differs from the 2008 Records Retention Policy, in that it better supports LACERA's business needs, and establishes more consistent compliance expectations creating accountability amongst management and staff. The methodologies used in producing the new RIM Policy provide a strong foundation for the RIM Program at LACERA, now, and in the future.


Once the Board of Retirement approves the Records and Information Management Policy, the document and the overall RIM program will be reviewed on an annual basis in accordance with the RIM Policy.

**Records and Information Management Policy  
Operations Oversight Committee  
Page 4 of 4**

**IT IS THEREFORE RECOMMENDED THAT YOUR COMMITTEE** recommends the Board of Retirement approve the Records and Information Management Policy dated July 1, 2016.

**NOTED AND APPROVED:**

  
\_\_\_\_\_  
JJ Popowich  
Assistant Executive Officer

  
\_\_\_\_\_  
Date

Attachment:  
Records and Information Management (RIM) Policy  
Records Retention Policy and Schedule



Los Angeles County Employees Retirement Association

## **RECORDS & INFORMATION MANAGEMENT (RIM) POLICY**

Last Revised: July 1, 2016



# Records & Information Management (RIM) Policy

<b>Subject</b>	Records & Information Management (RIM)
<b>Effective Date</b>	TBD
<b>Date of last revision</b>	July 1, 2016
<b>Previous policy</b>	Records Retention Policy and Schedule
<b>Contact</b>	James Beasley
<b>Related documents</b>	Records & Information Management (RIM) Manual
	Records Retention Schedule

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## **1. Background & Rationale**

### **1.1 Background**

The Records & Information Management (RIM) Policy replaces the previous Records Management Policy that was approved by the Board of Retirement on March 13, 2008.

### **1.2 Rationale**

LACERA recognizes that information and records are assets, vital for both ongoing operations and also in providing valuable evidence of business decisions, activities, member information, and transactions.

## **2. Purpose**

The purpose of the RIM Policy is to (1) establish an efficient organization-wide records management system for identifying, maintaining, retrieving, preserving and destroying records, (2) ensure that records are adequately protected, (3) preserve LACERA's history, (4) ensure that records that are no longer needed or of no value are destroyed at the appropriate time, (5) comply with all applicable local, state, and federal laws and regulations, and (6) provide guidance for the Managers, Staff, and other constituencies with respect to their responsibilities concerning document retention and destruction.

## **3. Authority, Application & Compliance**

### **3.1 Authority**

This policy has been authorized by the Board of Retirement and is available to all staff. It has been developed in consultation with the Legal Office and will be revised, as provided in Section 3.4. Ownership of the policy rests with the Records and Information Management (RIM) Unit in Administrative Services whom are responsible for LACERA's compliance with policy requirements and recordkeeping standards.

### **3.2 Application**

All staff must comply with this policy in their conduct of official business for LACERA. This policy applies to records in all formats, including electronic records.

### **3.3 Compliance**

Compliance with this Policy will be monitored by the Records Information and Management Unit (with the support of management). Failure to comply with this Policy, particularly, disobeying any preservation/litigation hold could result in possible civil or criminal sanctions. In addition, for staff, it could lead to disciplinary action including possible termination.

### **3.4 Policy Updates**

The RIM Unit will update this Policy as needed if there are any changes in the business or regulatory environment. Minor changes or updates such as contact information, grammatical errors and online references do not require review/approval by the Operations Oversight Committee and Board of Retirement. This Policy will be reviewed by the RIM Unit and the Legal Office on an annual basis.

## **4. General Provisions**

LACERA records, which may be electronic or paper form, shall be retained in accordance with the applicable guidelines including internal, state, and federal regulations. Records that do not need to be retained shall be destroyed after the requisite retention period has passed. A log or other documentation of records destruction will be created to track compliance with periodic audits for regulatory compliance. Pending or potential litigation may require a "hold" or suspension of regularly scheduled destruction of records or other information.

### **4.1 Definitions:**

**Non-Record Material:**

"Non-record material" consists of library material, publications not produced by LACERA, blank forms, and other materials that do not record the position or operations of the organization.

**Official Record:** An “official record” reflects the final, official record position or activities of an organization related to the specific content of the record.

**Record:** A “record” is any information, paper or electronic, recorded in a tangible form that is created or received by LACERA and documents some aspect of its operations.

**Unofficial Record:** An “unofficial record” does not yet reflect the final, official position or activities of an organization and are subject to change before completion.

**Vital Record:** As part of the Records Information and Management program and the Business Continuity Program, Vital Records are essential to the survival of the organization and are identified for protection from destruction in the event of a disaster. During the records inventory, which is conducted every five (5) years or when required, each division will determine which records for which they are responsible contain information vital for continued operations should a disaster occur. LACERA’s Vital Records include those documents that are critical for both ongoing operations and also in providing valuable evidence of business decisions, activities, member information, and transactions.

#### **4.2 Roles & Responsibilities**

**All Employees:** All employees are responsible for the creation and management of information and records as defined by this Policy including, but not limited to, safe storage, quick retrieval, records confidentiality, and appropriate records retention period for any

## Records & Information Management (RIM) Policy

Updated: July 1, 2016

record identified on the Record Retention Schedule.

**Assistant Executive Officers:** The AEO is responsible for the visible support of, and adherence to, this Policy by promoting a culture of compliant records and information management within the organization and contributing to the development of strategic documents such as the records and information management framework and strategy.

**Chief Executive Officer:** The CEO is ultimately responsible for the management of information and records within LACERA. The CEO promotes compliance with this Policy and delegates responsibility for the operational planning and running of the records and information program to the Assistant Executive Officer(s).

**Contract Staff:** Contract staff should create and manage records in accordance with this Policy to the extent specified in the contract.

**Legal Office:** The Legal Office is responsible, annually, for reviewing and approving any updates or changes to the retention schedule and RIM Policy, ensuring compliance with minimum retention periods pursuant to state, federal, and/or regulatory requirements; and communication of the implementation of "preservation hold," "litigation hold," or "legal hold" procedures that supersede an established retention schedule. The Legal Office will work with the RIM Unit as needed on an ongoing in connection with implementation of this policy.

**Managers/Supervisors:** Managers and supervisors are responsible for ensuring staff, including contract staff, are aware of

## **Records & Information Management (RIM) Policy**

Updated: July 1, 2016

and follow the records and information management practices defined in this Policy. They should advise the RIM Unit of any barriers to staff complying with this Policy. They should also advise the unit of any changes in the business environment which would impact the records and information management requirements.

### **RIM Unit:**

Under the leadership of the delegated Division Manager, the RIM Unit is responsible for overseeing the management of records and information consistent with the requirements described in this Policy. This includes providing annual training, advice and general support to staff, overseeing the proper use of record destruction methodologies, records inventory, and ongoing maintenance of the Record Retention Schedule. Information management products and tools may be used in the execution of the RIM Unit's duties and such tools may include data systems to assist in the creation of complete and accurate records, developing and implementing strategies to enable sound records management practices, monitoring compliance with the RIM Policy, procedures, and directives, and advising the AEO(s), Internal Audit, and the Legal Office of any risks associated with non-compliance. The RIM Unit will review the RIM Policy on an on-going basis to ensure organizational efficiency, as provided in Section 3.4.

### **Systems Division:**

Systems staff is responsible for supporting the RIM Program by maintaining the technology for LACERA's business information and records systems necessary for the implementation of this Policy, including appropriate system accessibility, security and back-up. Systems and RIM staff have an important joint role in supporting the

organization to ensure compliance with LACERA's policies, procedures, and guidelines of the records and information management program.

## **5. Records as a Resource**

LACERA recognizes that its records are a vital asset to:

- facilitate information accessibility, and enhance operations by supporting program delivery, management and administration
- deliver member services in an efficient, fair and equitable manner
- provide evidence of actions and decisions and precedents for future decision making, and
- protect the rights and interests of the County of Los Angeles, LACERA and its members

## **6. Benefits**

The RIM Policy ensures the reasonable and good faith retention of all records created by or under the control of LACERA, whether paper or electronic, that are necessary or advisable to retain for: business operations; historical value; payment of member benefits; member service; accounting, audit, tax and financial purposes; compliance with applicable law; possible future use in litigation involving LACERA; and possible future use in an official proceeding, audit or other matters. A legal hold notice shall be issued by the Legal Office when it becomes necessary to preserve a record or other information which may not otherwise be retained or is scheduled or due for ordinary and appropriate destruction in accordance with this Policy.

RIM's primary concern is the efficient and effective management of information. The guiding principle of RIM is to insure that information is available when and where it is needed, in an organized and efficient manner, and in a well-maintained environment. RIM is more than the retention schedule and the disposition of records; RIM also encompasses all the record-keeping requirements that allow LACERA to establish and maintain control over information flow and administrative operations. RIM seeks to control and manage records

through the entirety of their life cycle, from their creation to their final disposition.

Other benefits of effective records management include:

- Space Savings
- Reduced expenditures for new filing equipment
- Increased efficiency in information retrieval
- Compliance with legal, administrative, and fiscal retention requirements
- Identification and protection of Vital Records
- Identification of records with research value
- Identification of records with historical value

## **7. Best Practices**

Best practices, based on documented experience from a variety of recognized sources, are contained in the Policy, and will be maintained through the Policy review process, to help avoid problems and maintain high standards for Records and Information Management at LACERA. Best practices, as documented in the Policy, extend to LACERA's general policy and practices, codes of conduct, and related procedures, and are the basis of good Records and Information Management.

## **8. Elements of the Records & Information Management Program**

### **8.1 Storage**

Current hardcopy records should be stored in designated storage areas with access restrictions as appropriate to the level of confidentiality required.

Rarely used records or records no longer in use for official purposes that are still required to be retained in accordance with the current Retention Schedule should be forwarded to archive. Electronic records must be retained on LACERA's network. Records of short term value will be disposed of at suitable



intervals by the Systems Division. Records of long term or archival value should be retained on LACERA's network.

## **8.2 Records Retention Schedule**

A retention schedule is a control document that sets out the amount of time that LACERA needs to keep certain types of records in accordance with state or federal guidelines and as necessitated by business practices. The schedule applies to all records irrespective of the format in which they are maintained or the media upon which they are held.

A properly prepared and approved Records Retention Schedule is LACERA's legal authority to do what needs to be done with records and documents entrusted to the organization's care. It certifies the life, care, and disposition of LACERA records.

A Record Retention Schedule does not look at individual records but rather at the individual group, records series or collection of related records, and, for retention purposes, are evaluated together.

The Record Retention Schedule will be reviewed annually in accordance with the Policy and amended as needed to reflect changing legal requirements, business needs or evolving practices. The authority for any changes made to the Record Retention Schedule to conform to applicable state or federal laws and the necessity for business purposes is delegated to the CEO or his/her designee. Changes will be approved by the Legal Office prior to being made.

## **8.3 Retention of Email**

Email messages are electronic records created and sent to, or received by, a user of a computer system. This definition applies to the contents of the communications, the transactional information, and any attachments associated with such communication. It is the content and function of an email message that determines the retention period for that message. Therefore, records created or received using an email system will be retained according to the approved retention period in the Records Retention Schedule.

It is the responsibility of the user of the email system, to manage business email messages according to the RIM Policy. It is the responsibility of the sender of email messages, and recipients of the messages from outside of LACERA to retain the messages for the approved retention period. Official and Vital Records created using the email system should be saved to an appropriate archival medium. On the other hand, Unofficial and Non-Record Materials should not be saved.

The retention period of email messages that are not saved is the following: Items in "Inbox" and "Sent Items" will remain for sixty (60) days from inception date, and then removed to "Trash"; items in "Trash" will be deleted in fourteen (14) days, regardless of inception date. Email messages constituting Official and Vital Records that are subject to the Record Retention Schedule must be archived or saved promptly and in no event later than expiration of the seventy-four (74) day retention period for unsaved email messages. Support can be obtained from the Systems Division with respect to the proper archiving of email messages. LACERA's e-mail is for business purposes only.

#### **8.4 Preservation/Litigation Hold**

Records should be kept for a period of time not exceeding the established retention period, unless under relevant litigation or potential litigation, audit, or investigation and are subject to litigation holds. If the Legal Office informs you, that LACERA records are relevant to litigation or potential litigation you must preserve these records until the Legal Office determines that the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records such that records subject to a litigation hold should not be destroyed with the permission of the Legal Office. Further, if state or federal regulations specifies a longer retention period for any record identified on the retention schedule, state or federal regulations will supersede the Record Retention Schedule, as monitored and communicated by the Legal Office. Legal Office will inform RIM staff of any updates or changes that need to be made to the retention schedule, ensuring compliance with minimum retention periods pursuant to state, federal, and/or regulatory requirements. If you have questions concerning retention of records that may be relevant to litigation or a legal issue, regardless of whether they are subject to a litigation hold, the Legal Office should be consulted and will provide guidance.

### **8.5 Access**

Records must be available to all authorized staff that requires access to them for business purposes. All public access to LACERA records can be made through the Request for Public Records process. Questions regarding public access to documents should be directed to the Legal Office.

### **8.6 Contractors & Outsourced Functions**

All records created by contractors performing work on behalf of LACERA belong to LACERA and are LACERA records, subject to the terms of LACERA's contract with each individual contractor. This includes the records of contract staff working on the premises as well as external service providers.

Contracts should clearly state that ownership of records resides with LACERA, and instructions regarding creation, management, and access to the records created. The Legal Office must be consulted during the formulation of the contract.

### **8.7 Maintenance & Monitoring**

The location of all maintained records should be recorded and updated at every movement of the record. This ensures that records, as assets, can be accounted for in the same way that the other assets of LACERA.

The RIM Unit is responsible for ensuring that records and environmental conditions are monitored regularly to protect records. This includes checking temperature and humidity levels in dedicated records storage areas for paper records as well as regularly validating proper maintenance of records at offsite storage facilities.

The Systems Division is responsible for ensuring that digital records are stored, refreshed, and secured as required.

LACERA has implemented a number of security and Business Continuity measures, including information security policies, for safeguarding its information assets. Staff should abide by these measures at all times.

## **8.8 Transfer**

LACERA has an off-site storage facility for the storage of physical records that are infrequently used for business purposes but still need to be retained according to the Records Retention Schedule. The RIM Unit is responsible for transferring these records to the facility.

## **8.9 Disposal**

LACERA has a defined Records Retention Schedule for all divisions. The RIM Unit recommends that disposal actions are assigned to records in all formats on creation to ensure they are managed appropriately.

No LACERA records can be dispensed of unless in accordance with the Records Retention Schedule. Approval and signed authorization for retention, destruction or transfer of records must be sought from the appropriate division manager before any disposal takes place.

Records shall be maintained for as long as the period stated in the Records Retention Schedule, which schedule is based on the minimum periods required by applicable state or federal law, and necessity for ongoing business purposes. Unless a legal hold is in effect, destruction of records shall occur within one (1) month after the time period stated in the Records Retention Schedule has been met. Management will be contacted prior to the scheduled destruction for their final approval. Any request to extend the retention period of a document or a series of documents, must be made in writing to RIM staff providing business justification and approved by the Legal Office.

The RIM Unit will monitor and assure compliance with the disposal requirements of the Records Retention Schedule.

## **8.10 PROCEDURES MANUAL**

The Administrative Services RIM Unit shall be responsible for preparing and maintaining a procedures manual that details the records management process and any delegated duties and defined terminology. This procedures manual shall include this policy and must be approved by the Chief Executive Officer.

These procedures may be modified at any time as deemed necessary, provided that the procedures remain within the framework of this policy.

In the event that there is a conflict between this policy and the procedures manual the policy shall prevail.

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# RECORDS RETENTION POLICY AND SCHEDULE

## RECORDS RETENTION POLICY

The purpose of the records retention policy is to ensure that LACERA maintains records that are essential to its operation, to reduce costs and improve the efficiency of recordkeeping, and to ensure legal compliance with state, federal and regulatory requirements.

Records and Information Management (RIM) is the systematic control of all records, regardless of its form or the medium on which it is stored, from their creation or receipt, through their processing, distribution, storage, and retrieval to their disposition. These records consist of writings, films, tapes, electronic or computer based information, or data compilations in any format or medium, graphical images, and voice or data transmissions. Information can be stored on a variety of storage media, such as microfilm, microfiche, diskette, optical disk, CD-ROM, videotape, paper, etc. The minimum retention requirement is determined by content, not by the format or media.

## DEFINITIONS

Record: Information preserved by any technique in any medium; physical or electronic.

Official Record: An "official record" reflects the final, official recorded position or activities of an organization related to the specific content of the record.

Unofficial Record: An "unofficial record" does not yet reflect the final, official position or activities of an organization and are subject to change before completion.

Non-Record Material: "Non-record material" consists of library material, publications not produced by LACERA, blank forms, and other materials that do not record the position of the organization.

## RESPONSIBILITIES

- a. Records and Information Management staff are responsible for the development, implementation and review of records retention policies and schedule and for obtaining the approval of such policies by the Board of Retirement. Also, Records and Information Management staff are responsible for managing the records retention for all Divisions to ensure safe storage, quick retrieval, records confidentiality, and appropriate records retention;

## **RECORDS RETENTION POLICY AND SCHEDULE**

- b. The Legal Office is responsible for reviewing and updating the records retention policy, ensuring compliance with minimum retention periods pursuant to state, federal, and or regulatory requirements; and communicating the implementation of "preservation hold" or "litigation hold" procedures that supersede an established retention schedule;
- c. The Systems Division is responsible for ensuring compliance with "litigation hold" and "preservation hold" policies pertaining to electronic or computer based information;
- d. All employees are responsible for complying with the records retention policies and schedule.

### **E-MAIL RECORDS RETENTION**

E-mail messages are electronic records created and sent to, or received by, a computer system. This definition applies to the contents of the communication, the transactional information, and any attachments associated with such communication. The content of e-mail messages may vary considerably, and therefore, you must evaluate the email to determine the length of time the message must be retained. It is the content and function of an e-mail message that determines the retention period for that message. Therefore, records created or received using an e-mail system will be retained according to the approved retention period.

It is the responsibility of the user of the email system to manage e-mail messages according to the retention policy. It is the responsibility of the sender of e-mail messages and recipients of messages from outside of LACERA to retain the messages for the approved retention period. Records created using the e-mail system may be saved to an appropriate archival medium.

The retention period of email messages that are not saved is the following: Items in "Inbox", and "Sent Items" will remain sixty (60) days from inception date, and then removed to "trash"; items in "trash" will be deleted in fourteen (14) days, regardless of inception date.

### **PRESERVATION/LITIGATION HOLD**

Records should be kept for a period of time exceeding the established retention period if they are relevant to litigation or potential litigation, audit, or investigation. If you believe, or the Legal Office informs you, that LACERA records are relevant to litigation, or potential litigation (ie. a dispute that could result in litigation), you must preserve these records until the Legal Office determines that the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records. Further, if state or federal regulations specify a longer retention

## **RECORDS RETENTION POLICY AND SCHEDULE**

period for any record identified on the retention schedule, state or federal regulations will supersede the records retention schedule.

### **RECORDS RETENTION SCHEDULE**

LACERA shall retain records for a period of time consistent with an approved retention schedule. This period of time, called "the retention period", applies whether the record is on paper or residing on magnetic or optical media (hard disk, floppy disk, tape, CD, etc.). Once records have reached their designated time for destruction, they should be eliminated from all storage media and destroyed by approved methods.

Drafts generally are not retained and should never be retained longer than the official version that becomes the record.



### Records Retention Schedule

Retention ID	Records Category	Records Description	Official Records Retention	Retention Trigger	Duplicate Copies Retention	Office of Record
<b>ADMINISTRATIVE RECORDS</b>						
ADM2000	Actuarial Analysis Reporting	Records of information sent to actuaries for study. Information includes but is not limited to sample reports, correspondence, member benefit information, etc.	CY+5		MAX 3	Systems
ADM2005	Board Meeting Agendas/Minutes	Minutes and agendas from the Board of Retirement, Board of Investments, Joint Board and Board Committee meetings. Includes Board Resolutions, Board memos and green folder items.	IND		MAX 6	Executive Office
ADM2008	Board Meeting Audio/Video Recordings	Audio and video recordings of board meetings.	30 days		30 days	Systems
ADM2010	Board Member Records	Records that document board member's meeting attendance, training, appointment related information and personal information.	AT+7		MAX 3	Board Offices
ADM2020	Business Continuity Plan	Business continuity and resumption plan.	SUP		SUP	Administrative Services
ADM2030	Business Impact Analysis Files	Records relating to the analysis of potential threats and impact on the organization.	CY+6		MAX 3	Administrative Services
ADM2040	Company Vehicle Records	Records relating to the purchase of company vehicles. Includes but is not limited to certificate of title and registration.	ACT+7	Upon sale of vehicle.	ACT	Administrative Services
ADM2050	Consulting Actuarial Valuations	Annual actuarial valuations. Includes but is not limited to financial statement, source documents, participant data, STAR COLA report, operating tables, etc.	IND		MAX 5	Executive Office
ADM2070	Facilities Maintenance	Records relating to design, maintenance and repair of company facilities. Includes but is not limited to floor plans, drawings and maintenance requests.	ACT+1		ACT	Administrative Services
ADM2080	Facilities Asset Management	Records related to movement and/or tracking of company equipment, furniture or other tangible assets. Includes but is not limited to records related to equipment inventories and tracking of equipment.	ACT+7	Upon sale or disposal of assets.	MAX 3	Administrative Services
ADM2100	Insurance Policies	General and fiduciary insurance liability programs. Includes employee crime and employment practices liability coverage.	IND		MAX 3	Administrative Services
ADM2110	Internal Services	Records related to providing internal support for company personnel including services and supplies. Includes but is not limited to supply orders and user requests.	CY+3		MAX 3	Administrative Services
ADM2120	Records Destruction	Records of the destruction of company records. Includes destruction certificates.	IND		MAX 3	Administrative Services
ADM2140	Sale of Obsolete Equipment	Records relating to the sale of obsolete company equipment. Includes but is not limited to approvals, item listings, transmittals and sale documents.	CY+7		MAX 3	Administrative Services
ADM2150	Security	Records related to the protection and security of company staff and property. Includes but is not limited to key card lists, visitor sign-in logs, etc. <b>See HUM2065 for Incident Reports.</b>	CY+3		MAX 1	Various

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### Records Retention Schedule

Retention ID	Records Category	Records Description	Official Records Retention	Retention Trigger	Duplicate Copies Retention	Office of Record
<b>AUDIT RECORDS</b>						
AUD2000	Audit Records	Records documenting internal and external audits. Includes but is not limited to actuarial audits, advisor audits and work papers.	ACT+10	Upon completion of the audit.	MAX 5	Internal Audit
AUD2040	Quality Audits and Metrics	Records of quality audit results on internal business processes and services.	CY+7		MAX 5	Various
<b>BENEFITS ADMINISTRATION RECORDS</b>						
BEN2000	Cobra Eligibility Files	Includes but is not limited to correspondence, enrollment forms and tax transmittals.	CY+10		MAX 5	Retiree Health Care
BEN2010	Disability Case Appeals Denied / Not Working	Records of disability retirement litigation cases that have been appealed and then denied and where the applicant does not return to work.	AC+6		AC	Disability Litigation
BEN2011	Disability Case Appeals Granted	Records of disability retirement litigation cases that have been appealed and then granted. Includes Writ of Mandate.	AC+1		AC	Disability Litigation
BEN2012	Disability Case Appeals Denied/ Working	Records of disability retirement litigation cases that have been appealed and then denied and applicant returns to work.	AT+6		AT	Disability Litigation
BEN2013	Disability Case Files	Records of disability retirement claims that have been granted without appeal. Includes applications, summary evaluations and other records related to claims for disability retirement.	AC+3		AC	Disability Investigation
BEN2014	Disability Case Files Denied	Record of disability retirement claims that have been denied. Includes applications, summary evaluations and other records related to claims for disability retirement.	AC+6		AC	Disability Investigation
BEN2016	Disability Retirement Proceeding Audio/ Video Recordings	Recordings of disability retirement proceeding before the Board of Retirement.	CY+6		MAX 6	Disability Litigation
BEN2020	Domestic Partner Year-to-Date Computed Income Reports	Report listing members who require domestic partners 1099 tax form.	CY+7		MAX 5	Retiree Health Care
BEN2030	Health Care Insurance Reports	Reports used to reconcile, monitor or distribute health care insurance premiums.	CY+7		MAX 5	Retiree Health Care
BEN2040	Member Records	Records of members personal, medical, employment and retirement information and retirement related actions during membership with LACERA. Records in this category are usually imaged.	IND		MAX 1	Various
BEN2050	Monitoring Reports	Reports documenting various monitored activity in the Client In-Basket (CIB). Includes but is not limited to accuracy reports, audit reports, CIB activity reports.	CY+5		MAX 3	Various

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### Records Retention Schedule

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<b>FINANCIAL RECORDS</b>						
FIN1000	Budgets	Records relating to the projection and allocation of funds. Includes but is not limited to annual budget, quarterly reports and control reports.	IND		MAX 3	Administrative Services
FIN1010	Disbursements and Receipts	Records related to payment of financial obligations and receipt of revenues. Includes but is not limited to records related to vouchers, vendor invoices, W-9 forms, financial statements and reports, cancelled checks, payroll and payroll deductions.	CY+7		MAX 3	FASD
FIN1020	Federal and State Tax Reporting Files	Records relating to Federal and State tax reporting. Includes form 1099R, corrections, correspondence and other records relating to federal and state tax filing.	ACT+7	Tax return filing date.	MAX 3	FASD
FIN1050	Journals and Ledgers	Records used to record charges between company accounts and for summarizing account information.	CY+7		MAX 3	FASD
FIN1060	Reconciliation	Records related to reconciling accounts and verifying transactions and processes. Includes but is not limited to forms, reports and statements related to reconciliation.	CY+7		MAX 3	FASD
FIN4090	Real Property Bank Account Files	Records documenting the opening and maintenance of each bank account per property. Includes correspondence and copies of agreements..	ACT+7		ACT	Legal Office
<b>GENERAL RECORDS</b>						
GEN5000	Administration	Records related to divisional administration activities. Includes chronological files, attendance records, work reports, calendars, activity reports or other records not covered under any other category.	CY+3		MAX 3	Various
GEN5010	General Correspondence	General correspondence not covered under any other category.	CY+3		MAX 3	Various
GEN5020	General Logs	Records include all logs not covered under any other category.	CY+3		MAX 3	Various
GEN5030	General Records	Records that only need to be reviewed for a short period. Includes but is not limited to transmittal forms and other records not covered under any other category.	CY+1		MAX 1	Various
GEN5040	General Reports	Includes but is not limited to periodic reports which only need to be reviewed for a short period of time. Used for general reporting and analysis purposes.	CY+1		MAX 1	Various
GEN6060	Policies and Procedures - General	Records documenting internal policies and procedures for performing activities. Includes office and job practices, administrative handbooks and procedure manuals.	ACT+5		ACT	Various

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### Records Retention Schedule

Retention ID	Records Category	Records Description	Official Records Retention	Retention Trigger	Duplicate Copies Retention	Office of Record
GEN6070	Policies and Procedures - Organizational	Records documenting board approved policies and procedures for performing activities to ensure compliance with company and legal requirements.	IND		ACT	Various
GEN6080	Project Files	Records related to special projects that do not fall into any other category.	CY+5		MAX 5	Various
GEN6100	Request For Proposal (RFP)	Records relating to a formal request for proposal to an outside vendor or agency. Includes Request for Quote (RFQ) and Request for Information (RFI).	AC+7		MAX 5	Various
GEN6110	Surveys	Records of surveys conducted to collect information or receive feedback.	ACT+5	Following receipt of survey results.	MAX 3	Various
GEN6120	Telephone Logs	Telephone records including detailed and summary reports of telephone activity.	CY+1		MAX 1	Systems
GEN6130	Vendor Files	Records relating to activities with outside vendors and service providers. Includes but is not limited to contact information, brochures, catalogs and correspondence.	ACT+1		ACT	Various
<b>HUMAN RESOURCES RECORDS</b>						
HUM2000	Agency Temp Files	Records relating to temporary employees. Includes but is not limited to background information, interview information, etc.	AT+5		AT	Human Resources
HUM2005	Anti-Drug & Alcohol Misuse Prevention Program Records	Employee notification and testing records, including random test and results information.	AT+2		AT	Human Resources
HUM2010	Applications for Employment	Records of applications for employment. Includes but is not limited to application, resumes, degrees, reference, etc.	CY+2		MAX 2	Human Resources
HUM2020	Background Reports	Records of pre-employment screenings for potential new hires.	CY+5		MAX 3	Human Resources
HUM2025	Conflict of Interest Records	Conflict of Interest Code information and economic interest records, including notification memos and statements from board members, management and designated personnel.	CY+7		MAX 3	Human Resources
HUM2030	Discipline Files	Records documenting disciplinary actions taken towards employees.	AT+5		AT	Human Resources
HUM2040	DMV Employer Pull Notice Program	Records for the administration of the Mileage Permittee program. Includes but is not limited to DMV records, authorization forms, etc.	CY+5		MAX 3	Human Resources
HUM2050	Ergonomics Evaluations	Records documenting evaluations of ergonomic environment or workstation.	AT+7		AT	Administrative Services
HUM2060	Examination Files	Records kept for the purpose of documenting the employment examination process. Includes but is not limited to bulletins, statistical data and appraisals of promotability.	CY+5		MAX 3	Human Resources
HUM2065	Incident Reports	Records documenting workplace hazards, security threats, and employee injury during work hours.	CY+5		MAX 3	Administrative Services

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### Records Retention Schedule

Retention ID	Records Category	Records Description	Official Records Retention	Retention Trigger	Duplicate Copies Retention	Office of Record
HUM2070	Medical Files	Records documenting medical information and claims management. Includes but is not limited to workers compensation information, family medical leave information, benefit notices, physician designation form and leave of absence.	AT+30		AT	Human Resources
HUM2080	Payroll Files	Records of employee payroll. Includes but is not limited to position and salary information, letters to the employee regarding salary, garnishments, tax withholdings information, etc.	AT+30		AT	Human Resources
HUM2090	Personnel Files	Includes but is not limited to acknowledgement forms, performance evaluations, policy agreements, employee address and emergency information.	AT+30		AT	Human Resources
HUM2100	Rideshare Program Records	Employee Commute Reduction Program Plans, AVR surveys and other rideshare information.	CY+3		MAX 3	Human Resources
HUM2110	Safety Inspection Records	Records documenting discovered corrections, violations and recommendations for workplace safety.	CY+5		MAX 3	Administrative Services
HUM2120	Telecommuting Program Records	Records documenting the oversight of company telecommuting program.	CY+5		MAX 3	Human Resources
HUM2135	Training Records	Records of company wide training. This category includes but is not limited to course descriptions, course evaluations, sign in sheets, etc.	CY+10		MAX 5	Human Resources
HUM2136	Training Records - Employee Development	Records of employee development training. Includes but is not limited to course descriptions, course evaluations, training requests, etc.	AT+7		AT	Human Resources
HUM2140	Work Related Injury and Illness Reporting	Records of work related injuries and illnesses completed Form 300 and Form 300A, including surveys required by Dept. of Labor.	CY+5		MAX 3	Human Resources

#### INVESTMENT RECORDS

INV3000	Compliance	Records related to investment manager contract compliance and investment guideline compliance. Includes securities lending and derivative, insurance certifications, public markets manager's Audited Financial Statements, ADV, SAS 70 reports, etc.	CY+3		MAX 3	Investments
INV3010	Correspondence and Special Reports - Consultant	Records of consultant analysis and advice. Includes correspondence, annual performance reviews, monthly log of investment opportunities, monthly/quarterly performance reports of consultants, etc.	ACT+3	Termination of agreement or disposition of property.	ACT	Investments
INV3020	Correspondence and Special Reports- Managers, General Partners, & Vendors	Records and correspondence relating to investment managers, partnerships, and vendors. Includes but is not limited to capital calls; offering memorandums; general partner information & client legal questionnaires; records for Gateway Plaza; Member Home Loan Program records, strategic plans, etc.	ACT+3	Termination of agreement or disposition of property.	ACT	Investments
INV3030	Manager Statements - Monthly, Quarterly, Annual	Records relating to manager or vendor monthly, quarterly, or annual statements including performance data, etc.	CY+3		MAX 3	Investments

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### Records Retention Schedule

Retention ID	Records Category	Records Description	Official Records Retention	Retention Trigger	Duplicate Copies Retention	Office of Record
INV3040	Private Equity - Investment Working Files	Records documenting the process leading up to the signing of a partnership agreement. Includes correspondence, draft agreements, copies of all submitted documents, client questionnaire, etc.	ACT+7		ACT	Legal Office
INV3070	Proxies	Records of corporate proxies. Includes related documents, ballots, proxy analysis, etc.	CY+3		ACT	Investments
INV4000	Real Estate - Closing Binders	Purchase and sale agreements, deeds, closing statement and other documents related to purchase or sale of property.	IND		ACT	Legal Office
INV4010	Real Estate - Investment Program Records and Special Reports	Records of investment properties owned by LACERA. Includes but is not limited to correspondence, investment plans and appraisals, etc.	ACT+3	3 years	ACT	Investments
INV4020	Real Estate - Real Property Acquisition Files	Records documenting the purchase of real property. Includes correspondence, funding information, investment brief, legal service documents with outside counsel and other documents.	IND		ACT	Legal Office
INV4100	Search Candidates - Hired	Includes records related to managers and vendors hired during an RFI or RFP search process.	ACT+3	Termination of agreement or disposition of property.	ACT	Investments
INV4101	Search Candidates - Not Hired	Includes records related to managers and vendors not hired during an RFI or RFP search process.	CY+2		MAX 1	Investments
<b>LEGAL RECORDS</b>						
LEG2000	Class Action Settlements	Includes but is not limited to notice of class actions, notice of class action settlement and other related correspondence. <b>See LEG3000 for Settlement Agreement.</b>	ACT+10		ACT	FASD
LEG2500	Contract Compliance	Records relating to ensuring all parties comply with contract terms.	ACT+7		ACT	Various
LEG3000	Contracts	Records related to obligations under contracts, leases, and other agreements with outside parties.	ACT+7		ACT	Various
LEG3500	Global Tax Documentation	Records documenting foreign taxes on private equity investments. Includes power of attorney forms, penalty of purgery, IRS 8802 form, etc.	IND		ACT	Legal Office
LEG4000	Legal Opinions	Records documenting the specific legal advise provided by legal counsel.	ACT+7		ACT	Legal Office
LEG4010	Litigation Files (Claims, Disputes & Litigations)	Documents prepared produced or received relating to claims, disputes or litigation. Includes correspondence, discoverable documents, subpoenas, pleadings, declaration of custodian of records, securities litigation monitoring/evaluation, etc.	ACT+10		ACT	Legal Office
LEG4020	Marriage Dissolution Working Files	Working files include correspondence, court orders, joinder documents, pleadings, etc to review court orders. <b>For Marriage Dissolution records, see BEN2040 Member Records.</b>	ACT+1		ACT	Legal Office

ACT=Active, AC=After Closed, AT= After Termination, CY=Current Year, IND=Indefinite, MAX=Maximum, SUP=Superseded

**Records Retention Schedule**

<b>Retention ID</b>	<b>Records Category</b>	<b>Records Description</b>	<b>Official Records Retention</b>	<b>Retention Trigger</b>	<b>Duplicate Copies Retention</b>	<b>Office of Record</b>
LEG4040	Payment Requests for Title Holding Companies	Letter of authorization for the title holding company to pay invoices for legal fees related to purchase and sale of property and other related transactions.	CY+7		MAX 3	Legal Office
LEG4100	Title Holding Corporation Files	Evidence of maintenance of the title holding corporation. Includes minute books and financial statements.	IND		ACT	Legal Office
<b>PUBLICATION RECORDS</b>						
PUB3000	Publications	Works published to convey information to the public, company staff or association members. Includes but is not limited to annual reports and plan booklets.	IND		MAX 3	Communications
<b>SYSTEM RECORDS</b>						
SYS1000	Information Systems Project Files	Records documenting the development process for IRIS, CERIS, MDL and other LACERA information systems.	ACT+10	Upon decommission of information system.	ACT	Systems
SYS1030	System Change Request (SCR)	Records documenting changes to LACERA information systems.	ACT+10	Upon decommission of information system.	ACT	Systems

## FOR INFORMATION ONLY

July 5, 2016

TO: Operations Oversight Committee  
Joseph Kelly, Chair  
Yves Chery, Vice Chair  
Anthony Bravo  
Ronald Okum  
David Muir, Alternate

FROM: Robert R. Hill, Assistant Executive Officer *RRH*  
JJ Popowich, Assistant Executive Officer *JJ*

FOR: July 14, 2016 Operations Oversight Committee Meeting

SUBJECT: **LACERA OPERATIONS BRIEFING**

The purpose of this briefing is to share insights on staff activities, updates on goals, and discuss opportunities and/or concerns. Many of the items highlighted may recur in subsequent briefings or may result in a future comprehensive OOC presentation.

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- Public Records Request Update
- Report of Felony Forfeiture Cases Processed

RRH:rrh



DATE RECEIVED	REQUESTER	DOCS REQUESTED
05-07-16	O. Dieterle, Factset	<p>Requested Q2, Q3 and Q4 2015 (if available) Private Equity Reports. Also I requested Q1 to Q4 (if available) for the Real Estate Report.</p> <p>Six documents, shown below, transmitted to Requester.  <i>Transmitted Q1, Q2, and Q3 2015 PE reports. Also forwarded the Q1, Q2, and Q3 2015 RE reports. Informed Requester that Q4 for Real Estate is not released yet.</i></p>
05-10-16 MEDIA CONTACT	E. Wu PEI Media	<p>Preparing Article for existing and projected future emerging market strategy.</p> <p>Reporter sought clarification and confirmation of remarks re LACERA's emerging market strategy and use of primary funds and potentially an emerging market manage. (D. Simpson spoke on a panel at the EMPEM IFC on May 10 in Washington, D.C.</p>
05-10-16	D. Gregory, Public Plan IQ	<p><i>Pursuant to the state open records law Cal. Gov't Code Secs. 6250 to 6277, I write to request access to and a copy of Los Angeles County Employee Retirement Association</i></p> <ol style="list-style-type: none"> <li><i>1. May 10, 2016 Board of Investment Meeting, Agenda Item III A. Approval of Minutes April 13, 2016</i></li> <li><i>2. May 10, 2016 Board of Investment Meeting, Agenda Item VIII A. Real Estate Objectives, Policies and Procedures</i></li> <li><i>3. May 10, 2016 Board of Investment Meeting, Agenda Item VIII D. Meketa Approve Policy Target Weights</i></li> <li><i>4. May 10, 2016 Board of Investment Meeting, Agenda Item VIII E. Risk Parity Search</i></li> <li><i>5. May 10, 2016 Board of Investment Meeting, Agenda Item IX. A. Meketa - Hedge Funds: Review of Role and Implementation</i></li> <li><i>6. May 10, 2016 Board of Investment Meeting, Agenda Item IX E. Blackrock Institutional Trust</i></li> <li><i>7. May 10, 2016 Board of Investment Meeting, Agenda Item IX F. Wilshire Fund Performance</i></li> <li><i>8. May 10, 2016 Board of Investment Meeting, Agenda Item IX G. CEO Report</i></li> <li><i>9. May 10, 2016 Real Estate Committee, Agenda Item I. A. Minutes of Real Estate Committee April 13, 2016</i></li> <li><i>10. May 10, 2016 Equity Committee, Agenda Item II. A. Real Estate Investment Plan</i></li> <li><i>11. May 10, 2016 Equity Committee, Agenda Item I. A. Minutes of the Equity Committee February 10, 2016</i></li> <li><i>12. May 10, 2016 Equity Committee, Agenda Item II. A. Private Equity Terms &amp; Conditions</i></li> <li><i>13. May 10, 2016 Equity Committee, Agenda Item III. A. Private Equity Search Processes Update</i></li> </ol> <p><i>Three documents listed below transmitted.  The Board Of Investments Package from the May 10, 2016 meeting in response to Items 1-8.  For Item 9, the attached the RE Committee Agenda Package (note this meeting was canceled).  For items 10-13 attached the Equity Committee Meeting Agenda Package.</i></p>

DATE RECEIVED	REQUESTER	DOCS REQUESTED
05-17-16 MEDIA CONTACT	Andrew Harbin, S&P Global Market Intelligence	<p><b>Question:</b> The Board of Investments was to invite Cevian Capital, JANA Partners LLC, and Symphony Financial Partners to interview for the activist equity mandate. Can you tell me if these managers were hired? If so, how much was committed to each?</p> <p><b>Answer:</b> The Board of Investments approved the hiring of the three managers. JANA Partners LLC \$120 million, Cevian Capital \$250 million, and Symphony Financial Partners \$100 million</p>
05-18-16	A. Lucas, Buyouts	<p><i>Requested most up-to-date information listed below for each private equity, venture capital, real estate and related fund backed by the Los Angeles County Employees Retirement Association.</i></p> <p><i>Transmitted two documents shown below.</i>  <i>LACERA's most recent real estate and private equity holdings reports which are</i>  <i>RE Holdings 3Q 2015 PMR and</i>  <i>LACERA PE 3Q 2015.</i></p>
05-18-16 MEDIA CONTACT	C. Witkowsky, Buyouts Insider	<p>Preparing story about LACERA being the anchor LP in a first-time fund called Australis Partners. Requesting more information about this fund and why did LACERA decide to anchor this fund, and what anchoring a fund does for the pension.</p> <p><b>Answer:</b> Australis represents LACERA's first primary fund investment in the Latin America region. LACERA's staff believes there are positive long term sustainable market trends within the region that Australis will invest. Australis is the third anchor investment for LACERA. By serving as an anchor investor, LACERA is able to obtain significant access to and establish deep relationships with high-conviction General Partners, while negotiating favorable terms. The three investments represented spin-outs of established managers with longstanding track records addressing desirable market segments</p> <p><b>Question:</b> One thing I can't find anywhere - how much did you guys actually commit to Australis? And when did you finalize the commitment?</p> <p><b>Answer:</b> \$125mm. The Board approved the investment on August 12, 2012.</p>

DATE RECEIVED	REQUESTER	DOCS REQUESTED
05-24-16	W. D'Souza, Secondary Link	<p>Requesting information on alternative investments:</p> <ol style="list-style-type: none"> <li>(1) Names of all the limited partnerships (e.g. private equity, real estate, hedge fund, infrastructure and timber funds) your institution owns.</li> <li>(2) Sizes of all the limited partnerships.</li> <li>(3) Vintage years of all the limited partnerships.</li> <li>(4) Most updated information available on amount committed to the partnerships and amount drawn by the partnerships.</li> <li>(5) Distributions made by each individual partnership.</li> <li>(6) Net Asset Value of each partnership.</li> <li>(7) Internal rates of return (IRRs), TVPIs/Multiples, and DPI for each individual partnership, for the most recent date available. (Please specify whether the data is net or gross of expenses and fees.)</li> <li>(8) Date as of which all the above data was calculated.</li> </ol> <p><i>Transmitted three documents shown below. LACERA's most recent 2015 Q3 Public Equities Report, 2015 Q3 Real Estate Report and 2015 Q3 Hedge Fund Report.</i></p>
06-01-16	LA County Sheriffs Department	<p>Monthly request for Fire &amp; Sheriff Retirement lists.</p> <p><i>Transmitted via email monthly agenda reports for June 1, 2016. Date run for each report is May 26, 2016.</i></p>
06-01-16	J. Hammond, RELAC	<p>Monthly request of Benefit Approval List.</p> <p><i>Transmitted, via email, the June 1, 2016 list.</i></p>
06-02-16	G. Eubanks, Funston Advisors	<p>Requested agenda packet for BOI meeting to be held on Wednesday, June 8, 2016</p> <p><i>Transmitted information via email.</i></p>
06-03-16	Fred, Magna Capital Group	<p>Requested agenda packet for BOI meeting to be held on Wednesday, June 8, 2016</p> <p><i>Transmitted information via email.</i></p>
06-03-16	A. Poe, Reed Smith	<p>Requested agenda packet for BOI meeting to be held on Wednesday, June 8, 2016.</p> <p><i>Transmitted information via email.</i></p>
06-03-16	M. Keehn, LA County	<p>Requested agenda packet for BOI meeting to be held on Wednesday, June 8, 2016.</p> <p><i>Transmitted information via email.</i></p>
06-03-16	D. Kushner, Individual	<p>Requested agenda packet for BOI meeting to be held on Wednesday, June 8, 2016.</p> <p><i>Transmitted information via email.</i></p>

DATE RECEIVED	REQUESTER	DOCS REQUESTED
06-03-16	Vasudha Desikan, SEIU	Requested agenda packet for BOI meeting to be held on Wednesday, June 8, 2016.  <i>Transmitted information via email.</i>
06-04-16	J. Peterson, SBC Global	Requesting documents relating to following agenda items.  1. Up to \$150 million in CityView Multifamily Fund; 2. 4th Quarter 2105 real estate performance report; 3. Allocation of up to \$800 million for investment by equity; 4. real estate managers; and 5. Advance Capri Capital Partners to full manager status > <i>Transmitted 4 documents via email.</i> 1. <i>Final Memo PMR-Townsend 4<sup>th</sup> Qtr 2015;</i> 2. <i>Final BOI Investment Plan 2016-17, June 8, 2016;</i> 3. <i>Final PDF CVM III Package, June 1, 2016 and 4. Graduate Capital Final.</i>
06-08-16	Debra Gregory, Public Plan IQ	1. June 8, 2016 Board of Investment Meeting, Agenda Item VIII A. Private Equity Preferred Terms 2. June 8, 2016 Board of Investment Meeting, Agenda Item VIII B.1. Real Estate Investment Plan 3. June 8, 2016 Board of Investment Meeting, Agenda Item VIII B.2 Real Estate Allocate \$800 million 4. June 8, 2016 Board of Investment Meeting, Agenda Item VIII D. Investment in CityView MultiFamily 5. June 8, 2016 Board of Investment Meeting, Agenda Item IX. B. Meketa - Asset Allocation and Investment Policy Statement Reviews 6. June 8, 2016 Board of Investment Meeting, Agenda Item IX C. Meketa - Role of Commodities 7. June 8, 2016 Board of Investment Meeting, Agenda Item IX D. Hedge Fund Performance 8. June 8, 2016 Board of Investment Meeting, Agenda Item IX E. Real Estate Performance Measurement, Townsend.  <i>Transmitted one document via email.</i> <i>Board of Investments Agenda Packet from June 8, 2016</i>

DATE RECEIVED	REQUESTER	DOCS REQUESTED
06-08-16	Allison Kruk, Mandate Wire	<p>1) Did the board approve the real estate investment plan for the 2016-2017 fiscal year? If so, what does the plan entail? <b>Attached.</b> How much is the fund looking to commit to real estate during the fiscal year? <b>See attached Plan.</b> If you have a copy of the plan and can send it over, I'd really appreciate it. <b>Attached.</b></p> <p>2) Did the board decide to allocation up to \$800m to the fund's equity real estate managers? <b>This action was deferred.</b> Why was the commitment approved at this time?</p> <p>3) Did the board advance Capri Capital Partners to full manager status? <b>Yes.</b> If so, why was the status change approved? <b>See attached memo.</b> What was Capri's status prior to the change? <b>Emerging Manager.</b></p> <p>4) Did the board authorize a commitment of up to \$150m to Cityview Multifamily Fund III? <b>Yes.</b></p> <p>5) Was Capital Group's emerging market equity strategy terminated? <b>Yes.</b> If so, why and how will Capital Group's emerging market assets be reallocated? <b>No responsive documents.</b> Will there be a search for a replacement manager and if so, when will the replacement search take place? <b>No responsive documents.</b></p> <p>6) What is LACERA's current fund size? <b>Approximately 47 Billion.</b></p> <p><i>First email response is that some of the information has not been released yet.</i></p> <p><i>Two documents transmitted via email. Investment Plan 2016-2017 and BOI memo dated May 27, 2016 titled Capri Capital 06082016.</i></p>
06-09-16	A. Harbin S&P Global Market Intelligence	<p>Confirm if the \$150 million potential investment with CityView Multifamily Fund III was approved.</p> <p><i>Response via email: Confirmed.</i></p>
06-09-16	G. Chung, Financial Investment News	<p>Were all action items approved as presented?</p> <p><i>Email response: All actions items were presented and all actions items were approved except Item VIII.H.</i></p>

DATE RECEIVED	REQUESTER	DOCS REQUESTED
06-09-16	D. Gregory, Public Plan IQ	<p>Requested information on the numbered items listed below.</p> <ol style="list-style-type: none"> <li>1. June 8, 2016 Board of Investment Meeting, Agenda Item VIII A. Private Equity Preferred Terms.</li> <li>2. June 8, 2016 Board of Investment Meeting, Agenda Item VIII B.1. Real Estate Investment Plan.</li> <li>3. June 8, 2016 Board of Investment Meeting, Agenda Item VIII B.2 Real Estate Allocate \$800 million.</li> <li>4. June 8, 2016 Board of Investment Meeting, Agenda Item VIII D. Investment in CityView MultiFamily.</li> <li>5. June 8, 2016 Board of Investment Meeting, Agenda Item IX. B. Meketa - Asset Allocation and Investment Policy Statement Reviews.</li> <li>6. June 8, 2016 Board of Investment Meeting, Agenda Item IX C. Meketa - Role of Commodities.</li> <li>7. June 8, 2016 Board of Investment Meeting, Agenda Item IX D. Hedge Fund Performance, and</li> <li>8. June 8, 2016 Board of Investment Meeting, Agenda Item IX E. Real Estate Performance Measurement, Townsend.</li> </ol> <p><i>Submitted one document via email. June 2016 Board Agenda Packet.</i></p>
06-10-16	B. Shapiro, Money Management Intelligence	<p>Were the real estate investment and the Capital Group's mandate termination approved?</p> <p><i>Transmitted one document and responded via email: Board of Investments voted to terminate relationship re Capital Group. Document: Capital Group EM, 8-June-16.</i></p> <p>Second question presented in subsequent email. Was City View Fund item approved as well as the \$800 million Real Estate allocation for fiscal year 2016/2017.</p> <p><i>Response sent via email: Both of the items, commitment to Cityview and 2016-2017 Investment Plan for real estate, were approved.</i></p>

