

LIVE VIRTUAL BOARD MEETING



TO VIEW VIA WEB



TO PROVIDE PUBLIC COMMENT

You may submit a request to speak during Public Comment or provide a written comment by emailing PublicComment@lacera.com. If you would like to remain anonymous at the meeting without stating your name, please let us know.

Attention: Public comment requests must be submitted via email to PublicComment@lacera.com.

LOS ANGELES COUNTY EMPLOYEES RETIREMENT ASSOCIATION
300 N. LAKE AVENUE, SUITE 650, PASADENA, CA

A REGULAR MEETING OF THE BOARD OF RETIREMENT
LOS ANGELES COUNTY EMPLOYEES RETIREMENT ASSOCIATION

300 N. LAKE AVENUE, SUITE 810, PASADENA, CA

9:00 A.M., WEDNESDAY, NOVEMBER 3, 2021*

This meeting will be conducted by the Board of Retirement by teleconference under California Government Code Section 54953(e).

Any person may view the meeting online at
<https://LACERA.com/leadership/board-meetings>

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

- I. CALL TO ORDER
- II. APPROVAL OF MINUTES
 - A. Approval of the Minutes of the Regular Meeting of October 6, 2021
- III. PUBLIC COMMENT

(Written Public Comment - You may submit written public comments by email to PublicComment@lacera.com. Correspondence will be made part of the official record of the meeting. Please submit your written public comments or documentation as soon as possible and up to the close of the meeting.

Verbal Public Comment - You may also request to address the Board at PublicComment@lacera.com before and during the meeting at any time up to the end of the Public Comment item. We will contact you with information and instructions as to how to access the meeting as a speaker. If you would like to remain anonymous at the meeting without stating your name, please let us know.)
- IV. OTHER COMMUNICATIONS
 - A. For Information
 - 1. September 2021 All Stars
 - 2. Chief Executive Officer's Report
(Memo dated October 26, 2021)

V. DISABILITY RETIREMENT APPLICATIONS ON CONSENT CALENDAR

VI. CONSENT ITEMS

- A. Recommendation as submitted by Steven P. Rice, Chief Counsel: That the Board approves that, under AB 361 and Government Code Section 54953(e)(3) of the Brown Act, the Board of Retirement consider whether to find that the Governor's COVID-19 State of Emergency continues to directly impact the ability of the Board and its Committees to meet safely in person and that the County of Los Angeles and other agencies still recommend social distancing such that the Board and its Committees shall hold teleconference meetings for the next 30 days, and if so, direct staff to comply with the agenda and public comment requirements of the statute.
(Memo dated October 25, 2021)
- B. Ratification of Service Retirement and Survivor Benefit Application Approvals. (Memo dated October 26, 2021)
- C. Recommendation as submitted by Ricki Contreras, Division Manager, Disability Retirement Services: That the Board grant the appeals and requests for an administrative hearing for applicant Carlos H. Fernandez and Sheila R. La Bomme. (Memo dated October 21, 2021)
- D. Recommendation as submitted by Ricki Contreras, Division Manager, Disability Retirement Services: That the Board dismiss with prejudice Michael A. Lynd's appeal for a service-connected disability retirement.
(Memo dated October 20, 2021)
- E. Recommendation as submitted by Ricki Contreras, Division Manager, Disability Retirement Services: That the Board dismiss with prejudice Linda S. Yu Chow's appeal for a service-connected disability retirement.
(Memo dated October 21, 2021)
- F. Recommendation as submitted by Les Robbins, Chair, Insurance, Benefits and Legislative Committee: That the Board authorize a one-year extension of the current contract – 1) With Ackler & Associates and McHugh, Koepke & Associates commencing on January 1, 2022 and ending on December 31, 2022 to provide state legislative advocacy services; and 2) With Williams & Jensen and Doucet Consulting Solutions commencing on February 1, 2022 and ending on January 31, 2023 to provide federal legislative advocacy services. (Memo dated October 8, 2021)

VI. CONSENT ITEMS (Continued)

- G. Recommendation as submitted by Shawn Kehoe, Chair, Joint Organizational Governance Committee: That the Board approve the revised Code of Ethical Conduct. (Memo dated October 22, 2021)
- H. Recommendation as submitted by Shawn Kehoe, Chair, Joint Organizational Governance Committee: That the Board approve the revised Media Policy. (Memo dated October 22, 2021)

VII. EXCLUDED FROM CONSENT ITEMS

VIII. NON-CONSENT ITEMS

- A. Recommendation as submitted by William Pryor, Chair, Board of Retirement: Roles and Responsibilities Committee: That the Board review and consider the proposed revised Joint Organizational Governance Committee Charter. (Memo dated October 27, 2021)
- B. Recommendation as submitted by Barry W. Lew, Legislative Affairs Officer: That the Board approve the Board Officer Rotation Policy. (Memo dated October 21, 2021)
- C. Recommendation as submitted by Barry W. Lew, Legislative Affairs Officer: That the Board direct its voting delegate to vote YES on sponsorship by the State Association of County Retirement Systems (SACRS) of an omnibus bill for the SACRS 2022 legislative platform. (Memo dated October 8, 2021)

IX. REPORTS

- A. For Information Only as submitted by Ricki Contreras, Division Manager, Disability Retirement Services, regarding the Application Processing Time Snapshot Reports. (Memo dated October 20, 2021)
- B. For Information Only as submitted by Ted Granger, Interim Chief Financial Officer, regarding the following reports:
Monthly Travel and Education Reports for September 2021
(Public Memo dated October 20, 2021)
(Confidential Memo dated October 20, 2021 – Includes Anticipated Travel)

IX. REPORTS (Continued)

- C. For Information Only as submitted by Steven P. Rice, Chief Counsel, regarding the October 2021 Fiduciary Counsel Contact and Billing Report. (Memo dated October 22, 2021) (Privileged and Confidential Attorney-Client Communication/Attorney Work Product)
- D. For Information Only as submitted by JJ Popowich, Assistant Executive Officer, regarding the 2021 Quarterly Reports of Paid Invoices. (Confidential Memo dated October 19, 2021)

X. ITEMS FOR STAFF REVIEW

XI. GOOD OF THE ORDER
(For information purposes only)

XII. DISABILITY RETIREMENT CASES TO BE HELD IN CLOSED SESSION

- A. Applications for Disability
- B. Disability Retirement Appeals
- C. Staff Recommendations
 - 1. Recommendation as submitted by Ricki Contreras, Division Manager, Disability Retirement Services: That the Board approve the service provider invoice for Arthur Lipper, M.D. c/o Quality Medical Evaluators, Ltd. (Memo dated October 7, 2021)
 - 2. Recommendation as submitted by Ricki Contreras, Division Manager, Disability Retirement Services: That the Board reject the application of Mayra Joseph for processing. (Memo dated October 19, 2021)

XIII. EXECUTIVE SESSION

- A. Conference with Legal Counsel – Anticipated Litigation
Significant Exposure to Litigation (Pursuant to Paragraph (2) of Subdivision (d) of California Government Code Section 54956.9)
 - 1. Administrative Appeal of Michele Jordan

XIV. ADJOURNMENT

**Although the meeting is scheduled for 9:00 a.m., it can start anytime thereafter, depending on the length of the Committee meeting preceding it.*

Documents subject to public disclosure that relate to an agenda item for an open session of the Board of Retirement that are distributed to members of the Board of Retirement 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 Board of Retirement Trustees at LACERA's offices at 300 N. Lake Avenue, Suite 820, Pasadena, CA 91101, during normal business hours of 9:00 a.m. to 5:00 p.m. Monday through Friday.

Requests for reasonable modification or accommodation of the telephone public access and Public Comments procedures stated in this agenda from individuals with disabilities, consistent with the Americans with Disabilities Act of 1990, may call the Board Offices at (626) 564-6000, Ext. 4401/4402 from 8:30 a.m. to 5:00 p.m. Monday through Friday or email PublicComment@lacera.com, but no later than 48 hours prior to the time the meeting is to commence.

MINUTES OF THE REGULAR MEETING OF THE BOARD OF RETIREMENT
LOS ANGELES COUNTY EMPLOYEES RETIREMENT ASSOCIATION

300 N. LAKE AVENUE, SUITE 810, PASADENA, CA

9:00 A.M., WEDNESDAY, OCTOBER 6, 2021

This meeting was conducted by the Board of Retirement by teleconference under
California Government Code Section 54953(e).

PRESENT: Alan Bernstein, Chair

Vivian H. Gray, Vice Chair

Gina Zapanta, Secretary

JP Harris (Alternate Retired)

Elizabeth B. Ginsberg (Chief Deputy to Keith Knox)

Shawn R. Kehoe

Wayne Moore

Ronald Okum

William Pryor (Alternate Safety)

Les Robbins

Herman Santos

ABSENT: Keith Knox

STAFF ADVISORS AND PARTICIPANTS

Santos H. Kreimann, Chief Executive Officer

Luis A. Lugo, Deputy Chief Executive Officer

JJ Popowich, Assistant Executive Officer

Laura Guglielmo, Assistant Executive Officer

STAFF ADVISORS AND PARTICIPANTS (Continued)

Steven P. Rice, Chief Counsel

Jon Grabel, Chief Investment Officer

Dr. Glenn Ehresmann, Medical Advisor

Allan Cochran, Member Services Division Manager

Carlos Barrios, Benefits Division Manager

Ted Granger, Interim Chief Financial Officer

Carly Ntoya, Ph.D., Human Resources Director

Barry W. Lew, Legislative Affairs Officer

Francis J. Boyd, Senior Staff Counsel

Tamara Caldwell, Disability Retirement Specialist Supervisor

Vickie Neely, Disability Retirement Specialist Supervisor

Kerri Wilson, Disability Retirement Specialist Supervisor

Hernan Barrientos, Disability Retirement Specialist Supervisor

Ricardo Salinas, Disability Retirement Specialist Supervisor

Vincent Lim, Disability Litigation Manager

Allison E. Barrett, Senior Staff Counsel

Eugenia W. Der, Senior Staff Counsel

Jason E. Waller, Senior Staff Counsel

James Beasley, Supervising Assistant, Administrative Division

Jolene Williams, Kaercher Campbell & Associates Insurance Brokerage

Penni Campbell, Kaercher Campbell & Associates Insurance Brokerage

I. CALL TO ORDER

The meeting was called to order virtually by Mr. Bernstein at 9:00 a.m.

II. APPROVAL OF MINUTES

A. Approval of the Minutes of the Regular Meeting of September 1, 2021

Ms. Gray made a motion, Mr. Okum seconded, to approve the minutes of the regular meeting of September 1, 2021. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

III. PUBLIC COMMENT

There were no requests from the public to speak.

IV. OTHER COMMUNICATIONS

A. For Information

1. August 2021 All Stars

Mr. Popowich announced the winners for the month of August: Angela Ward and Paola Johns. The Rideshare winner was Liping Li and the Web Watcher winner was Persian Petrov.

2. Chief Executive Officer's Report
(Memo dated September 20, 2021)

Mr. Kreimann provided an update to the Board regarding the positions that were approved by the LA County Board of Supervisors and those that were rejected. In addition, Mr. Kreimann gave an update to the Strategic Planning Consultant RFP extension that was extended until October 15, 2021.

V. DISABILITY RETIREMENT APPLICATIONS ON CONSENT CALENDAR

Safety Law Enforcement
Service-Connected Disability Applications

On a motion by Mr. Okum, seconded by Mr. Pryor, the Board of Retirement approved a service-connected disability retirement for the following named employees who were found to be disabled for the performance of their duties and have met the burden of proof. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

<u>APPLICATION NO.</u>	<u>NAME</u>
540D	JAVIER PENA
541D*	JAMES L. WILSON
542D	FLOYD T. CALER, III
543D	MARCELO J. SAMPEDRO
544D	JEFFREY F. HAMIL
545D	DALE W. RYKEN
546D	EDWARD J. MCDONALD
547D	ALBERT H. RODRIGUEZ
548D**	KEVIN L. BEGGS
549D*	MICHAEL J. HARTLEY

*Granted SCD – Retroactive

**Granted SCD – Employer Cannot Accommodate

V. DISABILITY RETIREMENT APPLICATIONS ON CONSENT CALENDAR
(Continued)

Safety Fire, Lifeguards
Service-Connected Disability Applications

On a motion by Mr. Pryor, seconded by Mr. Robbins, the Board of Retirement approved a service-connected disability retirement for the following named employees who were found to be disabled for the performance of their duties and have met the burden of proof. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Pryor, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

<u>APPLICATION NO.</u>	<u>NAME</u>
1398B	CHRIS LANC
1399B	COREY D. MILLS
1400B	DONALD E. TRYON
1401B	JOHN B. OWENS
1402B	TODD A. RIBERA
1403B	JOHN D. DINGER
1404B	EDWIN ST. ANDREW, III
1405B	PATRICK S. WILSON
1406B	ERIC A. KUCK
1407B	JAY P. COLVIN
1408B	MARIO L. GONZALES

V. DISABILITY RETIREMENT APPLICATIONS ON CONSENT CALENDAR
(Continued)

General Members

Service-Connected Disability Applications

On a motion by Mr. Okum, seconded by Mr. Kehoe, the Board of Retirement made a motion to approve a service-connected disability retirement for the following named employees who were found to be disabled for the performance of their duties and have met the burden of proof. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

<u>APPLICATION NO.</u>	<u>NAME</u>
2277C*	DOMINIC R. VENTI
2278C**	TANISHA L. ARCENEUX
2279C*	GENE S. BOONE
2280C***	KIMBERLY A. BEYER
2281C**	LAURA M. WALTERS
2282C*	DANNY J. OVERTON
2283C	MARIAM PAKSHYAN
2284C***	ALLISON E. REESE
2285C	DAVID S. SMITH
2286C	SHEILA R. LA BOMME
2287C*	JESSIE W. COMER

*Granted SCD – Employer Cannot Accommodate

**Granted SCD – Retroactive Employer Cannot Accommodate

***Granted SCD – Salary Supplement

V. DISABILITY RETIREMENT APPLICATIONS ON CONSENT CALENDAR

General Members (Continued)
Service-Connected Disability Applications

<u>APPLICATION NO.</u>	<u>NAME</u>
2288C	CHINYERE C. MAYO
2289C*	FRANCESCA RECART-NAVARRO
2290C**	MARK E. EVANS

VI. CONSENT ITEMS

Mr. Okum made a motion, Mr. Robbins seconded, to approve Consent Items A-D. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

- A. Ratification of Service Retirement and Survivor Benefit Application Approvals. (Memo dated September 28, 2021)
- B. Recommendation as submitted by Ricki Contreras, Division Manager, Disability Retirement Services: That the Board grant the appeals and request for an administrative hearing for applicant Camille Padilla and Alejandro Salinas. (Memo dated September 23, 2021)
- C. Recommendation as submitted by Ricki Contreras, Division Manager, Disability Retirement Services: That the Board dismiss with prejudice Frank D. Dominguez's appeal for a service-connected disability retirement. (Memo dated September 21, 2021)
- D. Recommendation as submitted by Shawn R. Kehoe, Chair, Operations Oversight Committee: That the Board authorize staff to issue a Request for Proposal for software and consulting services to procure, configure, customize, and implement an enterprise Case Management System, which remains an important strategic initiative for LACERA's operational Divisions. (Memo dated September 22, 2021)

*Granted SCD – Salary Supplement

**Granted SCD – Employer Cannot Accommodate

VII. EXCLUDED FROM CONSENT ITEMS

There were no items excluded from Consent Items.

VIII. NON-CONSENT ITEMS

- A. Recommendation as submitted by Steven P. Rice, Chief Counsel: That the Board approves that, under AB 361 and Government Code Section 54953(e)(3) of the Brown Act, the Board of Retirement consider whether to find that the Governor's COVID-19 State of Emergency continues to directly impact the ability of the Board and its Committees to meet safely in person and that the County of Los Angeles and other agencies still recommend social distancing such that the Board and its Committees shall hold teleconference meetings for the next 30 days, and if so, direct staff to comply with the agenda and public comment requirements of the statute.
(Memo dated September 27, 2021)

Ms. Gray made a motion, Mr. Kehoe seconded, to approve staff's recommendation and to add this item to the Consent agenda moving forward. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe, Robbins, Bernstein, Ms. Ginsberg and Ms. Gray voting yes. Ms. Zapanta was not present for the vote.

- B. Recommendation as submitted by James C. Beasley, Jr., Supervising Administrative Assistant II: That the Board approve the purchase of Cyber Liability Insurance effective October 9, 2021, with insurance carriers Tokio Marine HHC, Brit/Ambridge (London), Miller/Hamilton (London), and Accredited Specialty Insurance Company at a total cost of \$484,132.
(Memo dated September 22, 2021)

Ms. Okum made a motion, Mr. Kehoe seconded, to approve staff's recommendation. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

VIII. REPORTS

- A. For Discussion Purposes as submitted by Alan J. Bernstein, Board of Retirement Chair and Keith Knox, Board of Investments Chair, that the Boards provide feedback and approve the key terms that will serve as a template and basis for creating a policy to implement the selection of board officers through a seniority-based system; and direct the Chief Executive Officer and staff to prepare a final policy for implementation prior to the selection of board officers by January 2022.
(Memo dated September 28, 2021)

Messrs. Lew and Rice were present and answered questions from the Board.

The Board provided staff with direction. The Item was received and filed.

- B. For Information Only as submitted by Ricki Contreras, Division Manager, Disability Retirement Services, regarding the Application Processing Time Snapshot Reports. (Memo dated September 23, 2021)

This Item was received and filed.

- C. For Information Only as submitted by Barry W. Lew, Legislative Affairs Officer, regarding Monthly Status Report on Legislation.
(Memo dated September 27, 2021)

This Item was received and filed.

- D. For Information Only as submitted by Ted Granger, Interim Chief Financial Officer, regarding the following reports:

Monthly Travel and Education Reports for August 2021

(Public Memo dated September 22, 2021)

(Confidential Memo dated September 22, 2021 – Includes Anticipated Travel)

This Item was received and filed.

- E. For Information Only as submitted by Steven P. Rice, Chief Counsel, regarding the September 2021 Fiduciary Counsel Contact and Billing Report. (Memo dated September 24, 2021) (Privileged and Confidential Attorney-Client Communication/Attorney Work Product)

This Item was received and filed.

X. ITEMS FOR STAFF REVIEW

There was nothing to report.

XI. GOOD OF THE ORDER
(For information purposes only)

There was nothing to report.

XII. DISABILITY RETIREMENT CASES TO BE HELD IN CLOSED SESSION

A. Applications for Disability

APPLICATION NO. & NAME

BOARD ACTION

5208B – ARAKS M. ZARGARIAN

Mr. Okum made a motion, Mr. Pryor seconded, to deny a service-connected disability retirement and find the applicant not permanently incapacitated since the employer can accommodate. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

5209B – NICHOLAS A. TORSACK

Ms. Gray made a motion, Mr. Okum seconded, to grant a service-connected disability retirement pursuant to Government Code Sections 31720 and 31724. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

5210B – GLORIA NEZAHUALCOYOTL

Ms. Gray made a motion, Mr. Kehoe seconded, to grant a service-connected disability retirement retroactive. The motion passed (roll call) with Messrs. Santos, Moore, Okum, Kehoe,

XII. DISABILITY RETIREMENT CASES TO BE HELD IN CLOSED SESSION

A. Applications for Disability (Continued)

APPLICATION NO. & NAME BOARD ACTION

5210B – GLORIA NEZAHUALCOYOTL (Continued)

Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

5173B – AZNIV HANESOGHLIAN*

Mr. Robbins made a motion, Mr. Okum seconded, to deny a service-connected disability retirement and find that the applicant is not permanently incapacitated since the employer can accommodate. The motion passed (roll call) with Messrs. Santos, Moore, Kehoe, Robbins, Bernstein, Okum, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

B. Disability Retirement Appeals

APPLICATION NO. & NAME BOARD ACTION

CRANDLON R. MCGINNIS - Thomas J. Wicke for the Applicant
Eugenia Der for the Respondent

Mr. Kehoe made a motion, Mr. Robbins seconded, to deny a service-connected disability retirement and find the applicant not permanently incapacitated. Ms. Gray made a substitute motion, Mr. Kehoe seconded, to review the transcript and evidence received by the referee. The motion passed (roll call) with Messrs. Santos, Moore, Kehoe, Robbins, Bernstein, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes. Mr. Okum was not present for the vote.

*Applicant Present

XII. DISABILITY RETIREMENT CASES TO BE HELD IN CLOSED SESSION
(Continued)

C. Staff Recommendations

1. Recommendation as submitted by Ricki Contreras, Division Manager, Disability Retirement Services: That the Board approve the service provider invoice for Elizabeth Moreno.
(Memo dated September 21, 2021)

Mr. Bernstein made a motion, Mr. Robbins seconded, to approve staff's recommendation. The motion passed (roll call) with Messrs. Santos, Moore, Kehoe, Robbins, Bernstein, Okum, Ms. Ginsberg, Ms. Zapanta and Ms. Gray voting yes.

XIII. EXECUTIVE SESSION

- A. Conference with Legal Counsel – Existing Litigation
(Pursuant to Paragraph (1) of Subdivision (d) of California Government Code Section 54956.9)

1. Ramos v. LACERA

The Board met in Executive Session pursuant to California Government Code Section 54956.9. On a motion by Mr. Harris, seconded by Mr. Santos, the Board approved to 1) Pay Oscar Ramos' court costs in the amount of \$622.12; and 2) Pay Oscar Ramos' attorney fees in the amount of \$12,450.00. The motion passed 8-0 (roll call), with Messrs. Bernstein, Santos, Kehoe, Robbins, Moore, and Mses. Gray, Zapanta, and Ginsberg voting yes. Trustee Okum was absent.

1. Edward V. Marquez v. LACERA

There was nothing to report.

XIII. EXECUTIVE SESSION (Continued)

B. Conference with Legal Counsel – Anticipated Litigation
Significant Exposure to Litigation (Pursuant to Paragraph (2) of Subdivision (d)
of California Government Code Section 54956.9)

1. Administrative Appeal of Michele Jordan

There was nothing to report.

C. Conference with Legal Counsel – Initiation of Litigation
(Pursuant to Paragraph (4) of Subdivision (d) of Section 54956.9)

Number of Cases: 1

The Board met in Executive Session pursuant to Government Code Section 54956.9. On a motion by Mr. Kehoe, seconded by Mr. Santos, to authorize staff to file a lawsuit against the County of Los Angeles and the Board of Supervisors of the County of Los Angeles to obtain an order that, under the California Constitution and applicable statutory law, LACERA's governing Board of Retirement and Board of Investments have sole authority and duty to appoint and to set the classifications and compensation of all of LACERA's personnel and the County and Board of Supervisors shall, consistent with their ministerial duty, incorporate such personnel and compensation decision into the County's salary ordinance, including the positions, classifications, and salaries requested by LACERA on the agenda of the October 5, 2021 Board of Supervisors meeting. Messrs. Kehoe, Moore, Robbins, and Santos, Meses. Ginsberg, Gray, and Zapanta voted yes, and Mr. Bernstein voted no. Mr. Okum was absent. The lawsuit was filed in Los Angeles Superior Court on October 18, 2021, as Case No. 21STCP03475.

October 6, 2021

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XIII. EXECUTIVE SESSION (Continued)

The Board took other action not yet subject to report.

XIV. ADJOURNMENT

There being no further business to come before the Board, the meeting was adjourned at 12:10 p.m.

Supplemental Information (Information provided to the Trustees prior to the meeting)

1. Conference with Legal Counsel – Anticipated Litigation
(Confidential Supplemental Memo dated August 30, 2021)
(Pursuant to California Government Code Section 54956.9)

GINA ZAPANTA, SECRETARY

ALAN BERNSTEIN, CHAIR



October 26, 2021

TO: Each Trustee,
Board of Retirement
Board of Investments

FROM: Santos H. Kreimann *SHK*
Chief Executive Officer

SUBJECT: **CHIEF EXECUTIVE OFFICER'S REPORT – NOVEMBER 2021**

The following Chief Executive Officer's Report highlights key operational and administrative activities that have taken place during the past month.

Our Ongoing COVID-19 Response and Return to Office

The Executive Team continues to monitor the COVID-19 landscape, both locally and nationally. The COVID-19 Pandemic continues to be an unfolding and fast-moving event that continues to change how public service organizations are responding to protect members of the public and public service employees.

As part of LACERA's health and safety requirements, the Executive Team reported at the September 1, 2021 Board of Retirement (BOR) meeting, that vaccinations will be required for all LACERA staff by October 1, 2021. Staff members were able to request an exemption from the vaccination requirement due to (1) credible religious reasons, or (2) medical reasons.

Approximately 373 staff members are fully vaccinated and 32 are unvaccinated but have requested a religious or medical exemption; and 2 employees are currently non-compliant. Eight staff members are on leave of absence, and we do not know their vaccination status; excluding those employees on leave, 91.6% of active employees are fully vaccinated. The number of vaccinated staff members will continue to be adjusted pending sufficient proof of full vaccination or management approval of religious/medical exemptions requests.

We are continuing to work through COVID-19 testing logistics for staff members approved for vaccination exemptions and are in the process of finalizing an agreement to administer tests and securely capture the report test results. We have a final draft of the vendor contract and a Statement of Work (SOW) ready to be delivered in the coming weeks. We anticipate securing this vendor by mid-November, which will allow us to implement LACERA's Return-to-Office plan soon thereafter. In the interim, a resource from the State of California's COVID-19 readiness page was shared with all staff members to enable them to find local testing sites as the need arises. The resource provides an interactive map allowing staff members to search for a free testing site by zip code (Finding a Testing Site arcgis.com). We continue to take a proactive approach in maintaining the health and safety of our staff members and members. Our staff members continue to follow established safety protocols when visiting our building, allowing us to continue to meet member expectations and deliver the high level of service we strive to always provide.

LACERA COVID-19 Incidents

As of the date of this memo, there have been three (3) incidents of a staff member exposure and one (1) COVID-19 positive staff member in the last month. No employees were exposed in the office during this period.

LACERA continues to follow the Public Health guidelines as they change and evolve, including the City of Pasadena’s requirement to use masks indoors. Management continues to limit the number of staff members physically in our offices daily. Based on the most recent numbers, we are averaging approximately 17% of our staff in the office on any given day.

Strategic Planning Consultant Update

The Strategic Planning Consultant Request for Proposal (RFP) closed on October 15, 2021. The selection committee is made up of four Trustees and three LACERA staff members. The committee will begin to review vendor proposals and schedule interviews in the coming weeks. The committee anticipates recommending a final selection to the Board of Retirement (BOR) meeting in December 2021.

Recruitment Updates

Filling vacant positions continues to be a high priority. The following summary provides an update of LACERA’s recruitment, assessment, and hiring efforts to reduce the number of vacancies.

Development

The Human Resources Division (HR) works with the hiring Division to review the classification description, create an ideal candidate profile, and discuss the assessment process. This is used to create the job bulletin and recruiting brochure (management positions only). The recruitments/assessments in development are listed below:

Classification	Vacancies	Division
Principal Investment Officer	2	Investments
Data Systems Analyst I	3	Systems
Retirement Systems Specialist	1	Systems
Document Processing Assistant	1	Admin. Services
Administrative Services Analyst I	1	Admin. Services
Administrative Services Analyst II	2	Admin. Services
Administrative Services Analyst III	2	Admin Services
Human Resources Analyst	2	Human Resources

Recruiting

The Human Resources team is recruiting qualified internal and external candidates to fill vacancies. Finding the right candidate(s) who will add value to the organization and help move us forward in meeting our goals is a top priority of our Human Resources Division. LACERA is currently accepting applications for Staff Counsel and conducting a resume canvas for Senior Staff Counsel. The Human Resources Division plans to issue a Request for Proposal to seek professional recruitment services for the Deputy Chief Investment Officer, Chief Information Technology Officer, Chief Financial Officer, and Information Security Officer positions, as these are highly specialized and critical positions.

Assessment

Having received a pool of qualified candidates, HR than administers the assessments. Examples of assessments include multiple choice tests, interviews, job simulations, and technical projects. Assessments and final scoring are taking place for the Senior Accountant and Retirement Benefits Specialist I examinations.

Hiring

Recent eligible lists/registers were promulgated for Media Artist, Senior Accountant, Procurement and Supply Clerk. The hiring departments are conducting selection interviews. Promotional and employment offers were approved to fill vacancies in the Senior Retirement Benefits Specialist, Data Systems Analyst II, Administrative Services Officer, and Senior Internal Auditor classifications.

Lastly, once the above phases are complete, HR staff members have the capacity to start the development process for other recruitments/assessments. Based on the current requests the next classifications for exam development are Information Systems Specialist I and Information Systems Specialist II.

Member Service Center

CEO Dashboard Update

At the October Board of Investments meeting, Vice Chair Kelly requested that regular reports on the number of registrations for MyLACERA be included in the CEO Report. The annual registration data has been available as part of the CEO Dashboard report since January 2020. We have refreshed the chart design to make it more visibly pleasing and clearer to read. The chart shows the annual registrations over the last five years by member types: Active, Deferred, and Retired/Survivors. We have also added a new graph to show the total registration numbers with the same breakdown. We may further stratify the membership breakdown in future reports.

We have been reporting the status of the Member Service Center reopening in the CEO Report narrative since we reopened in July. Now that operations have normalized, we will report the monthly numbers in the CEO Dashboard report as we have traditionally done. In keeping with the change in service channels that we offer, the Dashboard has been updated to report the number of

visits by service channel: In-Person, Virtual, and Phone Only. We continue to offer about 60% of the number of appointments when compared to the pre-pandemic time period. This condition will persist at least through the end of this year.

Retiree Healthcare (RHC) Update

On October 11, 2021, it was reported that members representing approximately 24,000 Kaiser nurses and other healthcare workers overwhelmingly voted to authorize a strike across numerous hospitals, clinics, and other Kaiser Permanente facilities over contract negotiations. However, the United Nurses Associations of CA (UNAC) and Union of Health Care Professionals (UHCP) are required by law to provide 10 days' notice to Kaiser Permanente before striking and any work stoppage. Kaiser has yet to notify our team of a formal strike notification as required by their labor contract. We will continue to monitor this situation closely.

Below is the response from Kaiser to our inquiry:

“We take any threat of a strike seriously. Our top priority is caring for our members and patients. We have contingency plans in place so members can continue to receive safe, high-quality care should a strike occur. In some cases, we may need to make decisions to reschedule appointments and elective surgeries and could need to close certain facilities. If this is necessary, we will contact you directly. Note: Our doctors would not be on strike and would continue to provide care during any potential strike activity. We apologize for any inconvenience a strike could cause.”

Lifetime Maximum Benefit (LMB)

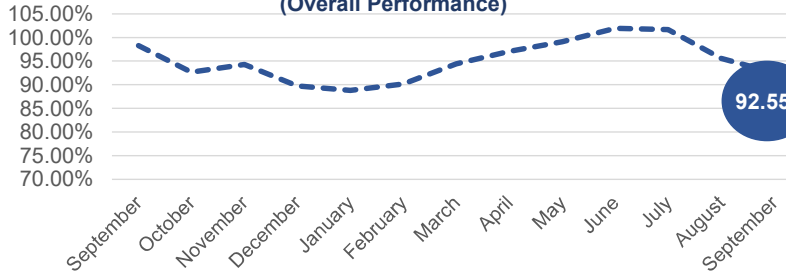
We continue to meet with our consultant (Segal) and Actuary (Milliman) on an analysis of eliminating the Lifetime Maximum Benefit (“LMB”) of \$1 million from all Anthem Blue Cross Non-Medicare plans. The LMB of \$1 million is currently in effect for Plans I, II, and Prudent Buyer. We expect to engage the County of Los Angeles in the coming months on elimination of the LMB.

Striving for Excellence in Service

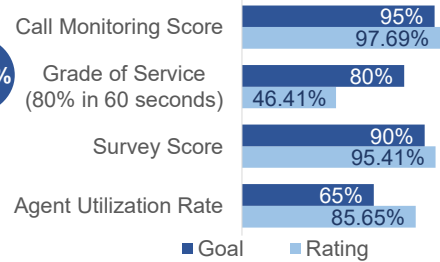
Service Metrics Reported on a Fiscal Year Basis (July 1) Through: **September 2021**

<p>Outreach Attendance 1,050 2,850 Year-to-Date</p>	<p>Outreach Events 23 71 Year-to-Date</p>	<p>Outreach Satisfaction N/A Change Since Last Mo</p>	<p>Member Service Center N/A - Change Since Last Mo</p>	<p>Member Services Calls 13,768 13,599 3 Mo. Avg.</p>
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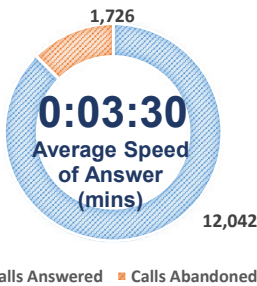
Key Performance Indicator (Overall Performance)



Key Performance Indicator (Components)



Member Services



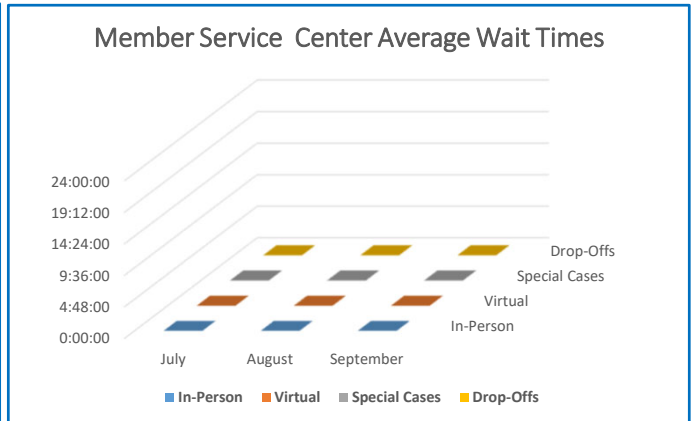
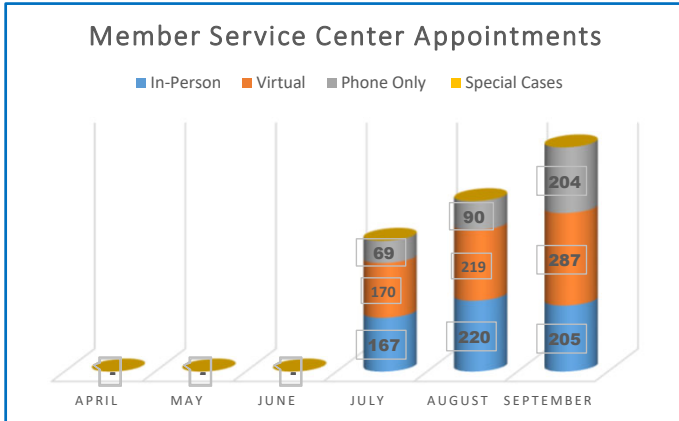
Top Calls

1. Retirement Counseling: Process Overview
2. Retirement Counseling: Estimate
3. MyLACERA Portal Login Issues

Emails 626
24:00 hours
Avg. Response Time (ART)

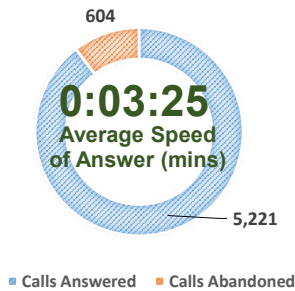


Secure Messages 771



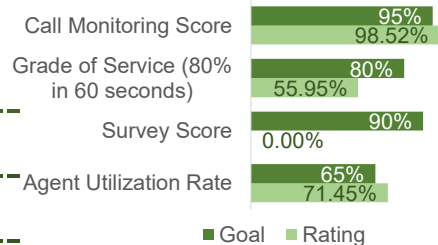
Retiree Healthcare

Total RHC Calls: **5,825**



Top Calls

1. Medical/Dental Enrollments
2. Medical Benefits
3. General Inquiries



Emails 251
10 Days
Avg. Response Time (ART)



Secure Messages 234

Striving for Excellence in Service (Continued)

Disability

Applications

705

**In Process
As Of:
9/30/2021**

698 Pending on: 8/31/2021
48 Received
129 Year-to-Date
0 Re-Opened
0 Year-to-Date
39 To Board - Initial
127 Year-to-Date
2 Closed
8 Year-to-Date

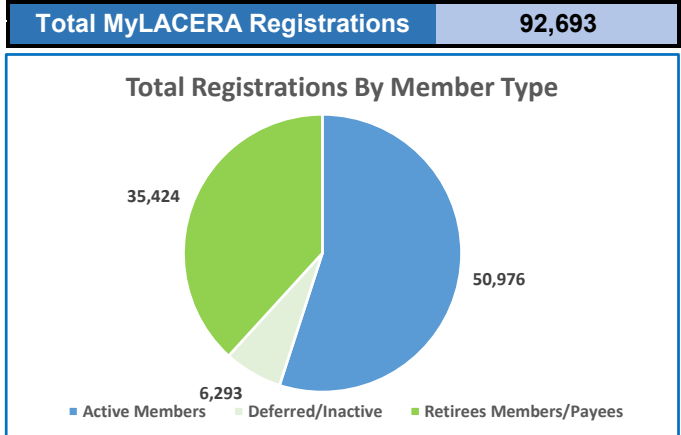
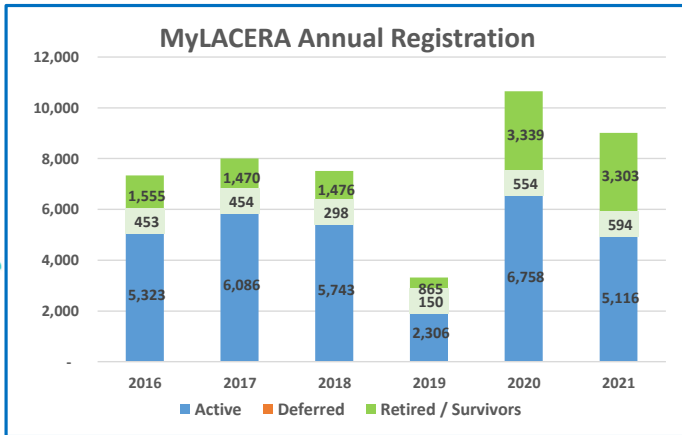
Appeals

92

**In Process
As Of:
9/30/2021**

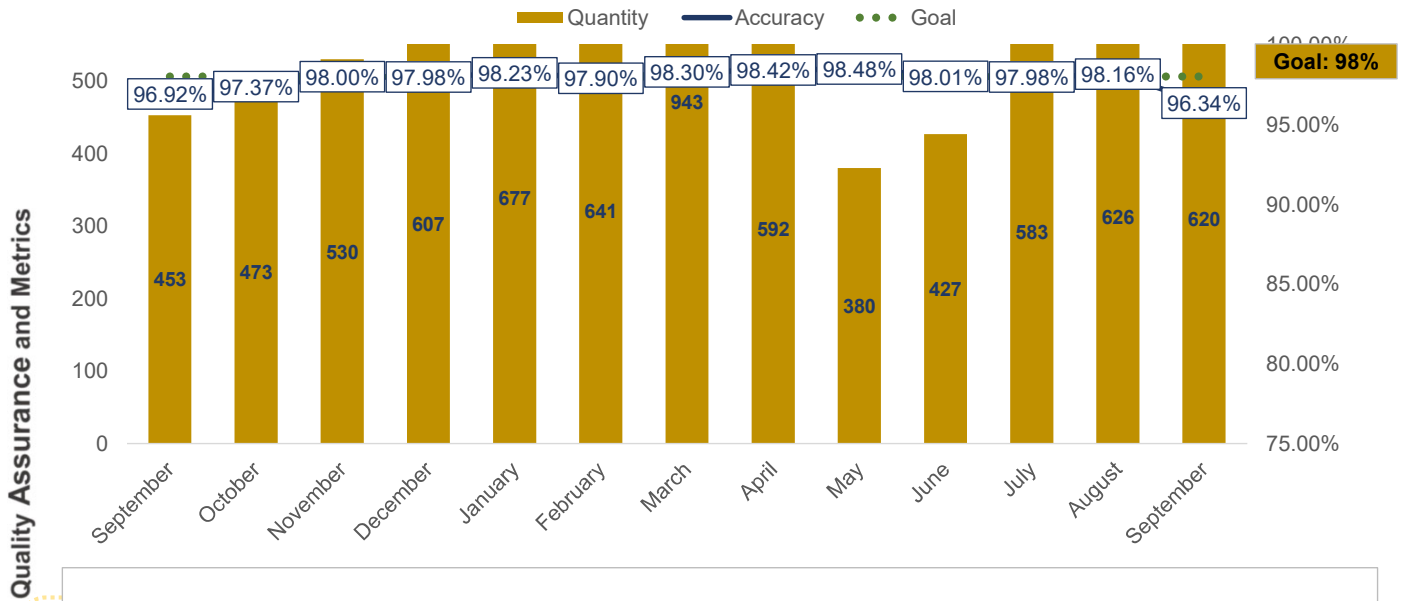
93 Pending on: 8/31/2021
1 Received
8 Year-to-Date
2 Admin Closed/Rule 32
10 Year-to-Date
0 Referee Recommended
2 Year-to-Date
0 Revised/Reconsidered for Granting
0 Year-to-Date

My LACERA



Striving for Excellence in Quality

Audits of Retirement Elections, Payment Contracts, and Data Entry Completed by QA



September

96.34%



Retirement Elections

308 Samples
96.65% Accuracy

Payment Contracts

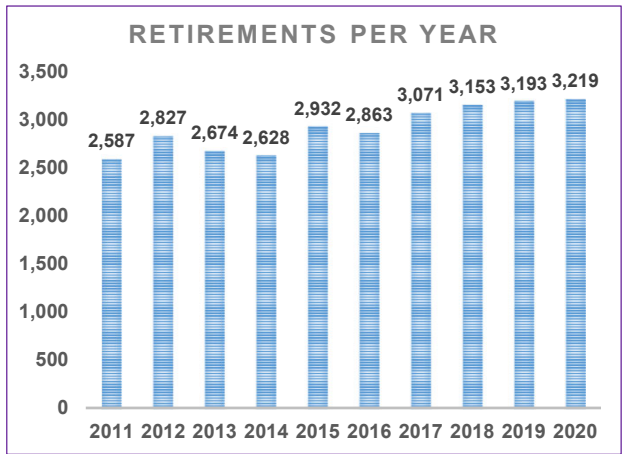
222 Samples
93.33% Accuracy

Data Entry

90 Samples
99.04% Accuracy

Member Snapshot

	Members as of 10/15/2021				
	Plan	Active	Retired	Survivors	Total
General	Plan A	68	14,620	4,242	18,930
	Plan B	19	653	67	739
	Plan C	20	424	65	509
	Plan D	37,697	18,589	1,716	58,002
	Plan E	14,934	14,385	1,427	30,746
	Plan G	32,619	132	10	32,761
	Total General	85,357	48,803	7,527	141,687
Safety	Plan A	2	4,729	1,636	6,367
	Plan B	8,559	7,005	358	15,922
	Plan C	4,511	16	1	4,528
	Total Safety	13,072	11,750	1,995	26,817
TOTAL MEMBERS	98,429	60,553	9,522	168,504	
% by Category	58%	36%	6%	100%	



Average Monthly Benefit Allowance Distribution October 22, 2021

	General	Safety	Total	%
\$0 to \$3,999	29,991	1,699	31,690	52.49%
\$4,000 to \$7,999	13,509	3,469	16,978	28.12%
\$8,000 to \$11,999	3,673	4,270	7,943	13.16%
\$12,000 to \$15,999	1,002	1,797	2,799	4.64%
\$16,000 to \$19,999	326	348	674	1.12%
\$20,000 to \$23,999	100	114	214	0.35%
\$24,000 to \$27,999	25	27	52	0.09%
> \$28,000	20	3	23	0.04%
Totals	48,646	11,727	60,373	100%

Average Monthly Benefit Allowance: \$ 4,549.00

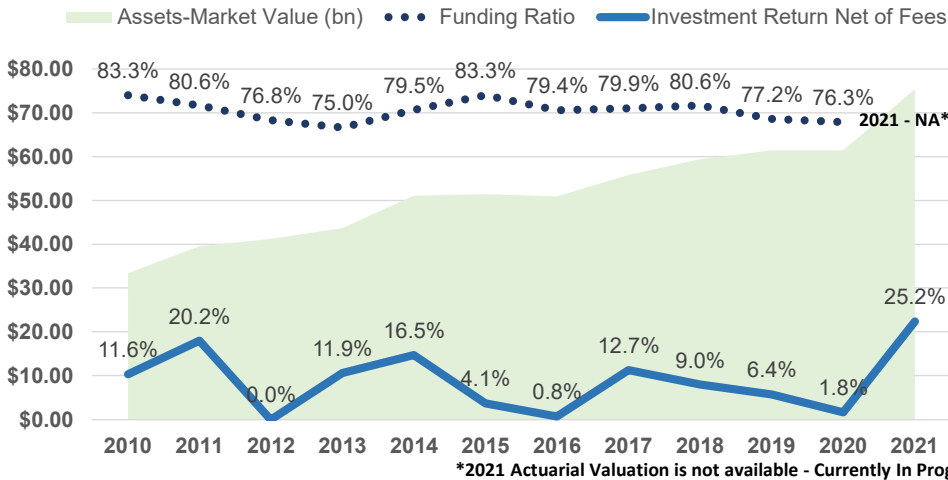
Healthcare Program Enrollments

(Mo. Ending: 09/30/2021)

	Employer	Member	Medical	Dental	Part B	LTC	Total
Medical	145.6	10.8	53,095	54,640	36,381	560	144,676
Dental	11.6	1.1					
Part B	20.1	0					
Total	177.3	11.9					

Key Financial Metrics

Fiscal Year End Financial Update (as of 06/30/2021)



Funding Metrics (as of 6/30/21)

Employer NC	10.89%*
UAAL	14.85%*
Assumed Rate	7%*
Star Reserve	\$614m
Total Assets	\$73.0b

Contributions (as of 6/30/21)

	Employer	Member
Annual Add	\$2.0b	\$761.0m
% of Payroll	24.64%*	7.8%*

TOTAL FUND RETURN (Net of Fees)

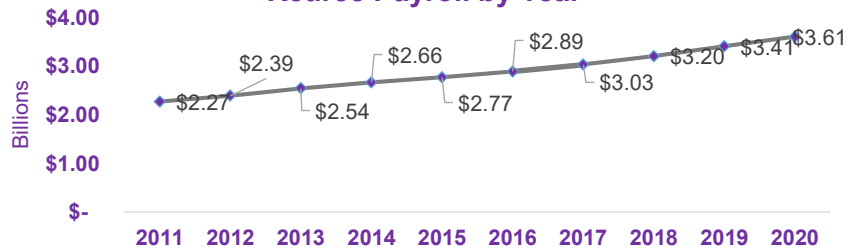
5 YR:	6.1%	10 YR:	8.2%
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Retired Members Payroll

(As of 09/30/2021)

Monthly Payroll	\$331.34m
Payroll YTD	\$1.0b
New Retired Payees Added	356
Seamless %	96.35%
New Seamless Payees Added	1,060
Seamless YTD	95.00%
By Check %	2.00%
By Direct Deposit %	98.00%

Retiree Payroll by Year



QUIET PERIOD LIST
Current Active Quiet Period List for Non-Investments

RFP/RFI Name	Issuing Division	RFP Issued	Status*	Quiet Period for RFP Respondents*
Search for Classification and Compensation Study Services (HR)	Human Resources	May 24, 2021	Bid Review	<ul style="list-style-type: none"> • Koff and Associates • Magnova Consultant • Grant Thornton • Reward Strategy Group
Search for Classification and Compensation Study Services (RHC)	Human Resources	May 24, 2021	Bid Review	<ul style="list-style-type: none"> • Koff and Associates • Magnova Consultant • Grant Thornton • Reward Strategy Group
Agenda Management, Livestream, Recording, and Archiving	Board Offices	April 16, 2021	Vendor Selection	<ul style="list-style-type: none"> • Granicus • Diligent iCompass • PrimeGov • eSCRIBE • Hyland • Provox Systems
Contract Lifecycle Management Application	Administrative Services/ Systems	February 16, 2021	Vendor Selection	<ul style="list-style-type: none"> • Icertis • Cobblestone • Agiloft • Iron Clad • SmartSheet
External Quality Assessment	Internal Audit	August 9, 2021	Vendor Selection	<ul style="list-style-type: none"> • IIA Quality Services, LLC • LLC; Mitchell & Titus, LLP. • TAP International. Inc, • Armanino LLP, • Sjoberg Evashenk Consulting • That Audit Guy, LLC.



RFP/RFI Name	Issuing Division	RFP Issued	Status*	Quiet Period for RFP Respondents*
Strategic Planning Consultant	Board Offices	August 23, 2021	Solicitation Process	<ul style="list-style-type: none"> • Academy for Leadership and Training • Bellatrix Group • The Segal Group • Athenian Group • KH Consulting • TBM & Associates
Case Management Software Solution	Systems Division	October 6, 2021	Solicitation Process	<ul style="list-style-type: none"> • RGB Projects • Aeon Nexus • Oracle • CrossFuze • Incapsulate • Main Street Computing • MERP Systems • Altia • Eightcloud • Accenture • Smartsheet • Cambria Solutions • CyanGate • MTX Group • Inovar • Slalom • Opentext • Deloitte

*Subject to change

**Does not include Investments related vendor searches

Date	Conference
November, 2021	
7-10	CRCEA (California Retired County Employees Association) Conference Long Beach, CA
9-11	Institutional Limited Partners Association (ILPA) General Partner Summit Virtual
9-12	SACRS Fall Conference Hollywood, CA
9-12	2021 SuperReturn Berlin Conference Berlin, Germany
December, 2021	
13-14	2021 Global Investors Annual Meeting New York, NY
January, 2022	
23-25	NCPERS (National Conference on Public Employee Retirement Systems) Legislative Conference Washington, D.C.
March, 2022	
5-8	CALAPRS (California Association of Public Retirement Systems) General Assembly Meeting TBD
7-9	Council of Institutional Investors (CII) Spring Conference Washington D.C.
14-17	AHIP (America's Health Insurance Plans) National Health Policy Conference Washington D.C.
23-24	PREA (Pension Real Estate Association) Spring Conference Beverly Hills, CA
24	NASP 12 th Annual "Day of Education in Private Equity" for Trustees and Staff TBD



Documents not attached are exempt from disclosure under the California Public Records Act and other legal authority.

**For further information, contact:
LACERA
Attention: Public Records Act Requests
300 N. Lake Ave., Suite 620
Pasadena, CA 91101**

October 25, 2021

TO: Each Trustee,
Board of Retirement
Board of Investments

FROM: Steven P. Rice *SPR*
Chief Counsel

FOR: November 3, 2021 Board of Retirement Meeting
November 17, 2021 Board of Investments Meeting

SUBJECT: Approval of Teleconference Meetings Under AB 361 and Government Code Section 54953(e)

RECOMMENDATION

That, under AB 361 and Government Code Section 54953(e)(3) of the Brown Act, the Board of Retirement and Board of Investments separately consider whether to find that the Governor's COVID-19 State of Emergency continues to directly impact the ability of each Board and its Committees to meet safely in person and that the County of Los Angeles and other agencies still recommend social distancing such that each Board and its Committees shall hold teleconference meetings for the next 30 days, and if so, direct staff to comply with the agenda and public comment requirements of the statute. Action taken by each Board will only apply to that Board and its Committees.

LEGAL AUTHORITY

Under Article XVI, Section 17 of the California Constitution, the Boards have plenary authority and exclusive fiduciary responsibility for the fund's investments, actuarial matters, and related issues. This authority includes the ability of each Board to manage their own Board and Committee meetings and evaluate and act on legal options for the conduct of such meetings, such as whether to invoke teleconferencing of meetings under the terms and conditions provided in AB 361 and Government Code Section 54953(e) of the Brown Act to protect the health and safety of Trustees, staff, and the public. The Board of Retirement previously took this action at its October 6, 2021 meeting, the Board of Investments took this action at its October 13, 2021 meeting.

DISCUSSION

A. Summary of Law.

On September 16, 2021, the Governor signed AB 361 which enacted new Government Code Section 54953(e) of the Brown Act to put in place, effective immediately and through December 31, 2023, new relaxed teleconferencing rules that may be invoked by local

legislative bodies, such as the LACERA Boards, upon making certain findings and following certain agenda and public comment requirements.

Specifically, Section 54953(e)(3) provides that the Boards may hold teleconference meetings without the need to comply with the more stringent procedural requirements of Section 54953(b)(3) if a state of emergency under Section 8625 of the California Emergency Services Act remains active or state or local officials have imposed or recommended social distancing rules, provided that the Board makes the following findings by majority vote:

(A) The Board has considered the circumstances of the state of emergency;

(B) Any of the following circumstances exist:

- (i) The state of emergency continues to directly impact the ability of the Trustees to meet safely in person;
- (ii) State or local officials continue to impose or recommend measures to promote social distancing.

If each Board makes the required findings, that Board and its Committees may hold teleconference meetings for the next 30 days without the need to comply with the regular rules of Section 54953(b)(3) provided that: agendas are prepared and posted under the Brown Act; members of the public are allowed to access the meeting via a call-in option or an internet-based service option; and the agenda provides an opportunity for public comment in real time and provides notice of the means of accessing the meeting for public comment.

B. Information Supporting the Required Findings and Process if the Boards Determine to Invoke Section 54953(e).

The Governor's State of Emergency for the COVID-19 pandemic as declared in the Proclamation of a State of Emergency dated March 4, 2020 remains active. The Proclamation was issued under the authority of Section 8625 of the California Emergency Services Act.

The Los Angeles County Department of Public Health maintains guidance to "Keep your distance. Use two arms lengths as your guide (about 6 feet) for social distancing with people outside your household when you are not sure that they are vaccinated." <http://publichealth.lacounty.gov/acd/ncorona2019/reducingrisk/>. The County Public Health Department also maintains guidance that employers should, "Implement policies and practices that support physical distancing: Whenever possible, take steps to reduce crowding indoors and enable employees and customers to physically distance from each other. Generally, at least 6 feet of distance (2 arm lengths) is recommended, although this is not a guarantee of safety, especially in enclosed or poorly ventilated spaces."

<http://publichealth.lacounty.gov/acd/ncorona2019/bestpractices/>

The Centers for Disease Control and Prevention (CDC) also still advise the public that, “Outside your home: Put 6 feet of distance between yourself and people who don’t live in your household.” <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html#stay6ft%20>.

The pandemic continues to present a significant health risk, as the virus presents itself in different variants. LACERA has not yet returned to the office. Management is preparing return to office vaccination and testing protocols to ensure the safety of LACERA employees, members, and others, including Trustees.

Under these circumstances, the Boards may reasonably conclude and find that teleconferencing under Section 54953(e) is appropriate for Board and Committee meetings during the next 30 days because (1) the state of emergency continues to directly impact the ability of the Trustees to meet safely in person, and (2) the County and other authorities continue to recommend measures to promote social distancing, as required by the statute.

If each Board makes these findings and directs teleconferencing under Section 54953(e), procedures exist and will be implemented to ensure compliance with the agenda and public comment requirements of the statute, as stated above.

CONCLUSION

Based on the above information, staff recommends that, under AB 361 and Government Code Section 54953(e)(3) of the Brown Act, the Board of Retirement and Board of Investments separately consider whether to find that the Governor’s COVID-19 State of Emergency continues to directly impact the ability of each Board and Committees to meet safely in person and that the County of Los Angeles and other agencies still recommend social distancing such that each Board and its Committees shall hold teleconference meetings for the next 30 days, and if so, direct staff to comply with the agenda and public comment requirements of the statute. Action taken by each Board will only apply to that Board and its Committees.

c: Santos H. Kreimann
Jonathan Grabel
Luis Lugo
JJ Popowich
Laura Guglielmo
Carly Ntoya



October 26, 2021

TO: Trustees, Board of Retirement

FOR: Board of Retirement Meeting on November 3, 2021

SUBJECT: Ratification of Service Retirement and Survivor Benefit Application Approvals

The attached report reflects service retirements and survivor benefit applications received as of the date of this memo, along with any retirement rescissions and/or changes approved at last month's Board meeting. Any retirement rescissions or changes received after the date of this memo up to the date of the Board's approval, will be reflected in next month's report.

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

SAFETY MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
PHILIP ASTENGO	SHERIFF Dept.#SH	12-05-2021	32 YRS 09½ MOS
BRIAN E. BARRE	SHERIFF Dept.#SH	09-30-2021	33 YRS 06 MOS
JEFFREY S. BRIGHT	DISTRICT ATTORNEY Dept.#DA	10-28-2021	31 YRS 02 MOS
DAVID M. BROOKHYSER	L A COUNTY FIRE DEPT Dept.#FR	09-30-2021	35 YRS 11 MOS
JOEL W. BROUMLEY	SHERIFF Dept.#SH	10-29-2021	30 YRS 07 MOS
JEFFREY D. CALE	SHERIFF Dept.#SH	10-30-2021	38 YRS 02 MOS
GERARDO L. DELGADO	L A COUNTY FIRE DEPT Dept.#FR	10-30-2021	27 YRS 05 MOS
STEVE W. FRANKLIN	L A COUNTY FIRE DEPT Dept.#FR	10-30-2021	31 YRS 02 MOS
KURT FREDERICK	L A COUNTY FIRE DEPT Dept.#FR	10-30-2021	29 YRS 03 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

SAFETY MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
DANIEL M. GRABOWSKI	SHERIFF Dept.#SH	10-30-2021	33 YRS 09 MOS
RONALD J. GREENE	SHERIFF Dept.#SH	11-27-2021	33 YRS 01 MOS
JAMES J. HELLMOLD	SHERIFF Dept.#SH	10-30-2021	33 YRS 03 MOS
RICHARD HERNANDEZ	SHERIFF Dept.#SH	10-29-2021	32 YRS 04 MOS
JAMES D. MOLIDOR	SHERIFF Dept.#SH	10-30-2021	31 YRS 06 MOS
WARREN M. ONDATJE	SHERIFF Dept.#SH	11-29-2021	32 YRS 01 MOS
MICHAEL S. PACHECO	L A COUNTY FIRE DEPT Dept.#FR	10-30-2021	25 YRS 07 MOS
JAMES E. ROY	L A COUNTY FIRE DEPT Dept.#FR	10-17-2021	33 YRS 07 MOS
JAMES G. WALKER	SHERIFF Dept.#SH	10-01-2021	31 YRS 08½ MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

SAFETY MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
GREGORY R. WRIGHT	SHERIFF Dept.#SH	10-30-2021	14 YRS 03 MOS
JOSE R. YARRUHS	DISTRICT ATTORNEY Dept.#DA	09-14-2021	06 YRS 03½ MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
TRACY A. AARON	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-29-2021	30 YRS 03 MOS
JOSE L. ABAD	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-31-2021	17 YRS 07½ MOS
ANAHID ABRAMIAN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-01-2021	22 YRS 01½ MOS
LAURA ACEVEDO	PARKS AND RECREATION Dept.#PK	11-01-2021	14 YRS 06½ MOS
MARK S. ADAMS	AGRICULTURAL COMM./WTS & MEAS. Dept.#AW	10-01-2021	40 YRS 09½ MOS
VARSIK AGAZARYAN	AMBULATORY CARE NETWORK Dept.#HN	10-30-2021	21 YRS 03 MOS
LAURA S. ALBA	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-04-2021	35 YRS 05½ MOS
NORMA ALCANTAR	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	26 YRS 03 MOS
MACLOVIA S. ALFARO	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-01-2021	38 YRS 04½ MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
JOSEPH E. ALIYEV	PUBLIC HEALTH PROGRAM Dept.#PH	10-16-2021	27 YRS 01 MOS
OLGA A. ALVAREZ-RAMI	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	10-01-2021	21 YRS 05½ MOS
MAHA A. AMAYREH	CHILDREN & FAMILY SERVICES Dept.#CH	09-30-2021	28 YRS 08 MOS
KAREN J. ANDERSON	SHERIFF Dept.#SH	10-30-2021	35 YRS 02 MOS
KATHY ANDERSON	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	30 YRS 00 MOS
MARIE ANGULO	ALTERNATE PUBLIC DEFENDER Dept.#AD	11-27-2021	29 YRS 04½ MOS
DAVID ATKINSON	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	08-25-2021	18 YRS 08½ MOS
ANH H. AU	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	09-30-2021	35 YRS 00 MOS
HENRY BARRON	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-30-2021	46 YRS 01 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
PATRICIA BATEMAN	PROBATION DEPARTMENT Dept.#PB	09-30-2021	25 YRS 01 MOS
MISRAK BERHAN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-30-2021	32 YRS 07 MOS
MARIAM M. BODURYAN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-30-2021	19 YRS 10 MOS
GLORIA E. BORJA	MENTAL HEALTH Dept.#MH	10-30-2021	34 YRS 09 MOS
PAOLA BOSCOLO	PUBLIC HEALTH PROGRAM Dept.#PH	10-17-2021	20 YRS 05 MOS
RENEE BOWEN	DISTRICT ATTORNEY Dept.#DA	11-30-2021	32 YRS 03 MOS
ALPHONSO BOYD	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-29-2021	30 YRS 00 MOS
ROSEMARIE P. BOYLE	PARKS AND RECREATION Dept.#PK	09-30-2021	14 YRS 00 MOS
DIANA L. BRIGGS	CHILD SUPPORT SERVICES Dept.#CD	11-30-2021	28 YRS 00 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
DELPHINE BROWN	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	10-01-2021	18 YRS 00 MOS
DEBORAH L. BRUMFIELD	PUBLIC WORKS Dept.#PW	10-01-2021	33 YRS 10½ MOS
SANDRA A. BUENTGEN	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	10-31-2021	36 YRS 03½ MOS
HOWARD BYAS JR	PROBATION DEPARTMENT Dept.#PB	10-31-2021	41 YRS 01½ MOS
BEVERLY P. CALHOUN	SHERIFF Dept.#SH	09-30-2021	43 YRS 00 MOS
COLONYA C. CALHOUN	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-30-2021	15 YRS 11 MOS
CYNTHIA A. CARBAJAL	AMBULATORY CARE NETWORK Dept.#HN	11-30-2021	39 YRS 08 MOS
MARILYN Y. CASTILLO	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-30-2021	17 YRS 03 MOS
SILVERIO P. CASTILLO	SHERIFF Dept.#SH	10-30-2021	12 YRS 00 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
MONICA L. CASTRO	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-31-2021	20 YRS ½ MOS
NORMA CENTANARO	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-27-2021	26 YRS 09 MOS
YONSOOK CHANG	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	09-30-2021	30 YRS 00 MOS
ZHONG J. CHEN	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-08-2021	11 YRS 01½ MOS
JIAN H. CHENG	SHERIFF Dept.#SH	10-30-2021	30 YRS 05 MOS
PATRICK T. CHIM	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-26-2021	27 YRS 01 MOS
JOHN K. CHIN	PUBLIC WORKS Dept.#PW	10-29-2021	35 YRS 03 MOS
JESSIE CHO	MENTAL HEALTH Dept.#MH	09-24-2021	06 YRS 07 MOS
STEPHANIE L. CLANCY	CHILDREN & FAMILY SERVICES Dept.#CH	11-30-2021	22 YRS 05 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
DEBORAH L. CLIPPER	SHERIFF Dept.#SH	10-31-2021	33 YRS ½ MOS
GLEND A. COBBS	CHILD SUPPORT SERVICES Dept.#CD	10-30-2021	25 YRS 09 MOS
DONNA LEE COLEMAN	CHILDREN & FAMILY SERVICES Dept.#CH	09-30-2021	30 YRS 00 MOS
CATHERINE D. COLLIE	AUDITOR - CONTROLLER Dept.#AU	09-30-2021	20 YRS 08 MOS
KENNETH M. COX	INTERNAL SERVICES Dept.#IS	10-01-2021	32 YRS 08½ MOS
DARLENE L. CREIGHTON	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	12-01-2021	30 YRS 01½ MOS
NIDA CURAMENG	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	09-30-2021	27 YRS 01 MOS
ALICE DE LA CRUZ	SHERIFF Dept.#SH	09-30-2021	41 YRS 03 MOS
VIOLET V. DEL MUNDO	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-30-2021	18 YRS 09 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
JOHN DEL RIO	PARKS AND RECREATION Dept.#PK	10-29-2021	35 YRS 03 MOS
JOANNE H. DO	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-29-2021	32 YRS 00 MOS
CARI J. DORROUGH	CHILDREN & FAMILY SERVICES Dept.#CH	10-30-2021	35 YRS 05½ MOS
GREGORY C. DRAPAC	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-30-2021	32 YRS 08 MOS
JAMES E. DUNN	PROBATION DEPARTMENT Dept.#PB	10-30-2021	26 YRS 07 MOS
GWENDOLYN D. DUPREE-PITTM	HEALTH SERVICES ADMINISTRATION Dept.#HS	10-30-2021	41 YRS 11 MOS
TIMOTHY DUTRA	MEDICAL EXAMINER-CORONER Dept.#ME	07-01-2021	04 YRS 00 MOS
MALIS EN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-29-2021	32 YRS 08 MOS
SARAH E. ENESI	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-30-2021	37 YRS 03 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
TINA M. ENRIQUEZ	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-06-2021	40 YRS ½ MOS
CARMEN ESPINO	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-30-2021	41 YRS 11 MOS
PAULITA F. ESPIRITU	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-30-2021	27 YRS 00 MOS
VANNESSA L. ESPY	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-08-2021	33 YRS 03 MOS
JOEL ESTREMOS	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-30-2021	30 YRS 06½ MOS
CRISTINA I. EULER-WIGGS	RANCHO LOS AMIGOS HOSPITAL Dept.#HR	09-30-2021	42 YRS 02½ MOS
IMELDA C. EVANCULLA	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-30-2021	32 YRS 01 MOS
WANDA M. EVANS	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-30-2021	40 YRS 07 MOS
REGINA A. FEE	PUBLIC HEALTH PROGRAM Dept.#PH	12-17-2021	32 YRS 09 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
SHEILA Y. FRANKLIN	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	10-30-2021	24 YRS 06 MOS
EILEEN FRIESEN-MOSH	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-30-2021	32 YRS 09 MOS
ROBIN FULLER	CHILDREN & FAMILY SERVICES Dept.#CH	09-14-2021	35 YRS 11½ MOS
ELIZABETH A. FULLERTON	PUBLIC HEALTH PROGRAM Dept.#PH	10-30-2021	15 YRS 00 MOS
BARBRA GARCIA	CHILDREN & FAMILY SERVICES Dept.#CH	10-29-2021	38 YRS 11 MOS
LORNA P. GARCIA	AMBULATORY CARE NETWORK Dept.#HN	10-30-2021	16 YRS 01 MOS
VALENCIA L. GARNER	CORRECTIONAL HEALTH Dept.#HC	10-30-2021	14 YRS 03½ MOS
GARY GERFEN	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-01-2021	30 YRS 11½ MOS
DIANE GOMEZ	INTERNAL SERVICES Dept.#IS	10-29-2021	38 YRS 11 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
MARIA R. GOMEZ	HEALTH SERVICES ADMINISTRATION Dept.#HS	10-30-2021	36 YRS 04 MOS
DAVID GONZALES	PUBLIC WORKS Dept.#PW	10-30-2021	33 YRS 01 MOS
LYDIA GONZALEZ	REG-RECORDER/COUNTY CLERK Dept.#RR	10-30-2021	29 YRS 05 MOS
GALINA N. GORYACHEVA	CORRECTIONAL HEALTH Dept.#HC	09-30-2021	15 YRS 08 MOS
EMMA GOVEA CHAVEZ	SHERIFF Dept.#SH	10-30-2021	38 YRS 05 MOS
ANITA V. GOWING	HEALTH SERVICES ADMINISTRATION Dept.#HS	10-29-2021	12 YRS 08 MOS
ROBIN M. GREGORY	PROBATION DEPARTMENT Dept.#PB	10-30-2021	34 YRS 07 MOS
MARIAN L. GRIDER	CHILDREN & FAMILY SERVICES Dept.#CH	11-30-2021	36 YRS 03½ MOS
OGANES GUMROYAN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-12-2021	24 YRS 01½ MOS

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BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
JOEL J. GUTIERREZ	AMBULATORY CARE NETWORK Dept.#HN	11-01-2021	05 YRS 01½ MOS
ANNETTE E. HALEY	CORRECTIONAL HEALTH Dept.#HC	09-30-2021	37 YRS 08 MOS
EDNA H. HAMILTON	PUBLIC DEFENDER Dept.#PD	11-15-2021	51 YRS 09½ MOS
CHARLEAN A. HARTSFIELD	ALTERNATE PUBLIC DEFENDER Dept.#AD	10-30-2021	26 YRS 08 MOS
DEBBIE L. HEINEMAN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-29-2021	41 YRS 08 MOS
RUDY C. HERRON	PARKS AND RECREATION Dept.#PK	12-17-2021	18 YRS 00 MOS
BING T. HUA	PUBLIC WORKS Dept.#PW	10-01-2021	34 YRS ½ MOS
ANGELA F. HUBBARD	DISTRICT ATTORNEY Dept.#DA	10-29-2021	36 YRS 02 MOS
FLAVIA O. HULIGANGA	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-30-2021	29 YRS 08 MOS

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BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
MELANIE Y. JACKSON	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	41 YRS 01 MOS
GWENDOLYN A. JACKSON	HEALTH SERVICES ADMINISTRATION Dept.#HS	10-25-2021	29 YRS 01½ MOS
IRMA G. JAIMES	PROBATION DEPARTMENT Dept.#PB	10-30-2021	31 YRS 03 MOS
WANDA R. JAMES	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-29-2021	31 YRS 09 MOS
IRENE A. JOHNSON	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-01-2021	27 YRS 01½ MOS
JAMIE D. JOHNSON	SHERIFF Dept.#SH	10-31-2021	25 YRS ½ MOS
DENISE N. JOHNSON	DISTRICT ATTORNEY Dept.#DA	09-30-2021	41 YRS 10 MOS
HENRY V. JOVELLANA	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-30-2021	39 YRS 00 MOS
STEVEN KAWATA	AMBULATORY CARE NETWORK Dept.#HN	10-13-2021	16 YRS 06½ MOS

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BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
RIMA KONARAKI	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	31 YRS 09 MOS
MARGERY Y. KUWADA SHINT	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-30-2021	40 YRS 06 MOS
CECILIA C. LAO	PUBLIC WORKS Dept.#PW	11-27-2021	20 YRS 06 MOS
MINNIE C. LAVENDER	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-30-2021	17 YRS 00 MOS
ALVART LAZAR	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	30 YRS 11 MOS
CARLOS R. LAZATIN	REG-RECORDER/COUNTY CLERK Dept.#RR	10-30-2021	31 YRS 08 MOS
DARRELL D. LEACH	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-01-2021	37 YRS ½ MOS
CAROL Y. LEE	PROBATION DEPARTMENT Dept.#PB	09-30-2021	31 YRS 10 MOS
JESSICA LEE	INTERNAL SERVICES Dept.#IS	11-27-2021	25 YRS 08 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
OLIVIA LEIVA	RANCHO LOS AMIGOS HOSPITAL Dept.#HR	12-31-2021	10 YRS ½ MOS
RONALD G. LESTER	PUBLIC HEALTH PROGRAM Dept.#PH	10-30-2021	11 YRS 02 MOS
GWEN LEWIS-REID	MENTAL HEALTH Dept.#MH	09-30-2021	21 YRS 07 MOS
BINH T. LIEM	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	34 YRS 05 MOS
ALICIA LISING	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	10-30-2021	42 YRS 09 MOS
DIANA M. LORING	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	10-30-2021	26 YRS 06 MOS
LISA M. LUCERO	ASSESSOR Dept.#AS	10-30-2021	42 YRS 08 MOS
GINA LUGO-TULLY	DEPARTMENT OF HUMAN RESOURCES Dept.#HM	12-19-2021	42 YRS 03 MOS
GLADYS D. LYLES	SUPERIOR COURT/COUNTY CLERK Dept.#SC	09-30-2021	41 YRS 06 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
VIJAY P. MANGHIRMALAN	HEALTH SERVICES ADMINISTRATION Dept.#HS	11-27-2021	30 YRS 04 MOS
ALICIA E. MARCEE	CHILD SUPPORT SERVICES Dept.#CD	10-31-2021	40 YRS 09½ MOS
THERESA MARINAN	LACERA Dept.#NL	10-30-2021	11 YRS 01 MOS
SHERYL MARTIN	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	10-31-2021	40 YRS 10½ MOS
DUNCAN Q. MCBRIDE	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-30-2021	33 YRS 00 MOS
DENISE A. MCQUINN	HEALTH SERVICES ADMINISTRATION Dept.#HS	09-30-2021	40 YRS 09 MOS
TIMOTHY E. MCTAGGART	PUBLIC WORKS Dept.#PW	10-01-2021	21 YRS 09½ MOS
MARIA F. MEDINA	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-15-2021	37 YRS 07½ MOS
VERJINEH K. MEHRABIANS	CHILD SUPPORT SERVICES Dept.#CD	09-28-2021	15 YRS 10½ MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
MARTIN A. MENDEZ	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-01-2021	37 YRS 03½ MOS
IRMA L. MENDOZA	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-31-2021	45 YRS 07½ MOS
SILVIA H. MEUWISSEN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-20-2021	20 YRS 10 MOS
MAYINDI MOKWALA	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-30-2021	28 YRS 03 MOS
MARTHA MOLINA-AVILE	WORKFORCE DEV AGING & COMM SVC Dept.#CS	11-27-2021	33 YRS 04 MOS
STEVEN L. MONETTE	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-29-2021	27 YRS 04 MOS
CARMEN MORALES	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-30-2021	30 YRS 09 MOS
RUTH MORALES	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-30-2021	22 YRS 00 MOS
VIRGINIA MORENO	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-30-2021	22 YRS 01 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
BEVERLY J. MORISAWA	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-30-2021	20 YRS 01 MOS
PATRICIA E. MORTON-DAVIS	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-30-2021	47 YRS 01 MOS
MARIA C. MORUA	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	30 YRS 01 MOS
MICHELE M. MOUTON	SUPERIOR COURT/COUNTY CLERK Dept.#SC	11-30-2021	37 YRS 09 MOS
LUCILE MUNDO	PUBLIC HEALTH PROGRAM Dept.#PH	10-30-2021	07 YRS 00 MOS
COLLEEN A. MURPHY	SHERIFF Dept.#SH	10-31-2021	33 YRS 01½ MOS
DENISE K. NAGAO	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-30-2021	38 YRS 05 MOS
MARLYS NAKATA	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-30-2021	38 YRS 09 MOS
LINDA NAVAS	CHILD SUPPORT SERVICES Dept.#CD	10-30-2021	41 YRS 05 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
HOVSEP NAZARYAN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-29-2021	15 YRS 06 MOS
SYLVIA NEVAREZ	SUPERIOR COURT/COUNTY CLERK Dept.#SC	12-01-2021	24 YRS 07½ MOS
RACHEL T. NIETO	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-31-2021	42 YRS 05½ MOS
LISA K. NUNN	MENTAL HEALTH Dept.#MH	10-30-2021	36 YRS 00 MOS
GABRIELA V. OBROCEA	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	09-16-2021	05 YRS 11 MOS
SANDRA OCAMPO	PROBATION DEPARTMENT Dept.#PB	10-15-2021	29 YRS 04½ MOS
URIEL OCAMPO	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-30-2021	31 YRS 09 MOS
SUZETTE OSAYOMWANBOR	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-07-2021	24 YRS 00 MOS
DEBORAH M. PACHECO	SHERIFF Dept.#SH	09-25-2021	44 YRS 01 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
TERI L. PATTON	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-27-2021	31 YRS 05 MOS
CHARLES E. PEER	PUBLIC WORKS Dept.#PW	10-26-2021	35 YRS 06 MOS
TERESITA C. PEREDO	CORRECTIONAL HEALTH Dept.#HC	11-27-2021	16 YRS 00 MOS
MARIE T. PEREZ	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-30-2021	25 YRS 06 MOS
AUGUSTO C. PEREZ	PROBATION DEPARTMENT Dept.#PB	09-30-2021	32 YRS 06 MOS
THU-SUONG T. PHAM	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-30-2021	25 YRS 10½ MOS
CHARLES R. PIERCE	PROBATION DEPARTMENT Dept.#PB	10-30-2021	23 YRS 10 MOS
ALICE M. POWELL	PROBATION DEPARTMENT Dept.#PB	10-30-2021	41 YRS 02 MOS
ESTELLA PRENDEZ	CHIEF EXECUTIVE OFFICE Dept.#AO	10-30-2021	42 YRS 05 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
CARLOTA B. PRICE	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-31-2021	18 YRS 08½ MOS
EDWARD PUENTE	PUBLIC WORKS Dept.#PW	09-24-2021	30 YRS 04 MOS
YEN K. QUACH	PUBLIC WORKS Dept.#PW	10-15-2021	26 YRS 04½ MOS
JACQUELINE F. QUARLES	L A COUNTY FIRE DEPT Dept.#FR	11-01-2021	43 YRS 09½ MOS
ANNETTE M. QUARLES	CHILDREN & FAMILY SERVICES Dept.#CH	09-30-2021	48 YRS 01 MOS
JANA K. QUINN	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-30-2021	22 YRS 10½ MOS
VICTORIA C. RAMIENTO	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-31-2021	30 YRS ½ MOS
PATRICE R. RANDOLPH	SHERIFF Dept.#SH	10-31-2021	34 YRS 04½ MOS
DIANE L. REGE CZ	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	12-01-2021	07 YRS 05½ MOS

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BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
YOLANDA REOLA	JUVENILE COURT HEALTH SERVICES Dept.#HJ	10-30-2021	25 YRS 05 MOS
REGINA Riestra	CHILD SUPPORT SERVICES Dept.#CD	09-23-2021	21 YRS 02 MOS
RACHEL RIVA	ANIMAL CONTROL Dept.#AN	10-31-2021	23 YRS ½ MOS
NADINE RODRIGUEZ	PUBLIC HEALTH PROGRAM Dept.#PH	10-29-2021	37 YRS 08 MOS
LAURA RODRIGUEZ	SUPERIOR COURT/COUNTY CLERK Dept.#SC	09-30-2021	42 YRS 10 MOS
JOHN E. ROSS	CHILDREN & FAMILY SERVICES Dept.#CH	09-25-2021	34 YRS 09 MOS
ERNA F. ROYAL	DISTRICT ATTORNEY Dept.#DA	10-30-2021	37 YRS 03 MOS
ALEXANDRA RUANO	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	10-29-2021	22 YRS 01½ MOS
MARIA A. SANDOVAL	CHILDREN & FAMILY SERVICES Dept.#CH	10-31-2021	28 YRS 01 MOS

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GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
ISABEL SANEZ	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	09-30-2021	20 YRS 03 MOS
ALMA C. SANTANA	SHERIFF Dept.#SH	11-30-2021	31 YRS 04 MOS
NANCY SANTOYO	CHILDREN & FAMILY SERVICES Dept.#CH	10-02-2021	28 YRS 06½ MOS
EDNA SHIRVANIAN	MENTAL HEALTH Dept.#MH	10-30-2021	13 YRS 00 MOS
DEBORA SHISHIDO	PUBLIC HEALTH PROGRAM Dept.#PH	11-27-2021	37 YRS 08 MOS
JOSEPHINE SHUM	PROBATION DEPARTMENT Dept.#PB	09-20-2021	20 YRS 04 MOS
JO-HELEN SHUMATE	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	49 YRS 06½ MOS
DENNIS SIMONIAN	PUBLIC WORKS Dept.#PW	09-30-2021	13 YRS 08 MOS
SUBODH K. SINHA	PUBLIC WORKS Dept.#PW	10-30-2021	36 YRS 02 MOS

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GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
EUSTOLIA SOTELO	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-27-2021	30 YRS 02 MOS
NATALIA Z. SPERLING	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	30 YRS 05½ MOS
SANDRA SPIKES	CHILDREN & FAMILY SERVICES Dept.#CH	09-30-2021	35 YRS 10 MOS
SUSAN L. SPINELLI	HEALTH SERVICES ADMINISTRATION Dept.#HS	10-29-2021	25 YRS 03 MOS
CHRISTOPHER J. SPISAK	PARKS AND RECREATION Dept.#PK	01-01-2022	15 YRS 04½ MOS
ROBERT D. STEGEMEIER	PUBLIC WORKS Dept.#PW	10-29-2021	21 YRS 05 MOS
STEPHEN J. STRATI	DEPARTMENT OF HUMAN RESOURCES Dept.#HM	11-30-2021	29 YRS 04 MOS
ROSA M. SUAZO	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	12-31-2021	28 YRS ½ MOS
R S. TELFORD	MENTAL HEALTH Dept.#MH	10-30-2021	30 YRS 08 MOS

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GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
TERRIE D. TENGELSEN	DISTRICT ATTORNEY Dept.#DA	10-30-2021	32 YRS 06 MOS
ELIZABETH G. THOMAS	SHERIFF Dept.#SH	10-30-2021	16 YRS 00 MOS
PUANGRAT TIRAWAT	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-13-2021	30 YRS ½ MOS
DAISY TORRES	COUNTY COUNSEL Dept.#CC	11-30-2021	16 YRS 06 MOS
STEVE Q. TRAN	INTERNAL SERVICES Dept.#IS	10-29-2021	35 YRS 09 MOS
NGUYET M. TRAN	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-30-2021	37 YRS 11 MOS
THERESA TREJO	AUDITOR - CONTROLLER Dept.#AU	10-25-2021	43 YRS 08 MOS
ESTELLA E. TRIPP	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-18-2021	20 YRS ½ MOS
CHRISTOPHER TRUONG	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	10-30-2021	05 YRS 03 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
MINH N. TSCHEN	INTERNAL SERVICES Dept.#IS	11-30-2021	31 YRS 10 MOS
RODNEY TYSON	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-31-2021	30 YRS 06½ MOS
JING C. TZENG	MENTAL HEALTH Dept.#MH	11-27-2021	20 YRS 00 MOS
ANTHONY J. VACA	CHILDREN & FAMILY SERVICES Dept.#CH	11-30-2021	25 YRS 00 MOS
BLANCA A. VALDEZ	BEACHES & HARBORS Dept.#BH	11-27-2021	25 YRS 02 MOS
ZHANET VARDEVANYAN	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-30-2021	27 YRS 10 MOS
JOSE C. VASQUEZ	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-29-2021	14 YRS 07 MOS
CYNTHIA VERGEL DE DI	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	10-30-2021	26 YRS 08 MOS
SYLVIA C. VIGO	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-30-2021	36 YRS 03 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
ESTHER VILLANUEVA	DEPT OF PUBLIC SOCIAL SERVICES Dept.#SS	11-30-2021	26 YRS 10 MOS
MARIA L. VILLEGAS	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-30-2021	41 YRS 00 MOS
RENEE L. VITAL	SHERIFF Dept.#SH	10-30-2021	22 YRS 00 MOS
GRETA B. WALKER	DISTRICT ATTORNEY Dept.#DA	09-30-2021	38 YRS 00 MOS
SHIRLEY C. WEI	INTERNAL SERVICES Dept.#IS	10-18-2021	17 YRS 08 MOS
ALTHEA W. WELLS	CHILDREN & FAMILY SERVICES Dept.#CH	10-02-2021	49 YRS 01 MOS
SURENA M. WHITE	SHERIFF Dept.#SH	10-04-2021	25 YRS 04½ MOS
DEBBIE E. WILLIAMS	INTERNAL SERVICES Dept.#IS	10-30-2021	28 YRS 07 MOS
JOYCE WILLIAMS	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-29-2021	35 YRS 02 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
KEVIN M. WILLIAMS	PROBATION DEPARTMENT Dept.#PB	09-02-2021	36 YRS 06 MOS
MONIQUE C. WILLIAMS	RANCHO LOS AMIGOS HOSPITAL Dept.#HR	09-30-2021	21 YRS 01 MOS
TERRY WILLIAMS	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-30-2021	26 YRS 01 MOS
DIANA F. WOO	ASSESSOR Dept.#AS	10-29-2021	28 YRS 10 MOS
FORSTINE L. WOOLENS	PUBLIC LIBRARY Dept.#PL	09-30-2021	42 YRS 06 MOS
ALICE A. WU	CHILDREN & FAMILY SERVICES Dept.#CH	10-31-2021	35 YRS 08½ MOS
DOREEN M. YOUNG	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-30-2021	31 YRS 00 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

SAFETY SURVIVOR APPLICATIONS

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
DENISE L. GOREE	SHERIFF Dept.#SH	08-16-2021	32 YRS 02½ MOS
WIFE of JOSEPH B GOREE dec'd on 08-15-2021, Sect. #31781.1			

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL SURVIVOR APPLICATIONS

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
DAVID L. MANN	SUPERIOR COURT/COUNTY CLERK Dept.#SC	12-24-2020	15 YRS 02½ MOS
HUSBAND of CARMEN RIVERA dec'd on 12-23-2020, Sect. #31781.3			

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT FROM DEFERRED

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
HEIDI K. ANSELL	SHERIFF Dept.#SH	09-16-2021	10 YRS 11 MOS
ROBIN BRACKIN	CHILD SUPPORT SERVICES Dept.#CD	09-16-2021	32 YRS 10½ MOS
CATHRYN BROUGHAM	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-15-2021	15 YRS 02 MOS
ZAIDA G. CLAYTON	SUPERIOR COURT/COUNTY CLERK Dept.#SC	10-01-2021	13 YRS 00 MOS
ROXANN CORTEZ	CHILD SUPPORT SERVICES Dept.#CD	09-21-2021	20 YRS 08 MOS
ALICE V. DICKSON	CHILDREN & FAMILY SERVICES Dept.#CH	03-01-2013	24 YRS 00 MOS
ROSEMARY GARCIA	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	03-01-2020	23 YRS 00 MOS
LAURA L. GOLLES	AUDITOR - CONTROLLER Dept.#AU	09-27-2021	12 YRS 02 MOS
ANNA M. GOMEZ	AGRICULTURAL COMM./WTS & MEAS. Dept.#AW	09-08-2021	40 YRS 04½ MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT FROM DEFERRED

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
JOACHIM W. GRANZOW	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	10-22-2021	19 YRS 01 MOS
NANCY H. GREEN	INTERNAL SERVICES Dept.#IS	09-09-2021	35 YRS 11 MOS
NANCY L. HACKNEY	SUPERIOR COURT/COUNTY CLERK Dept.#SC	09-10-2021	09 YRS 11 MOS
RHONDA L. HALL	Dept.#365	09-10-2021	10 YRS 10 MOS
MORRELL HAMMICK	AMBULATORY CARE NETWORK Dept.#HN	08-28-2021	26 YRS 05 MOS
FREDERICK C. HARRIS	CHILDREN & FAMILY SERVICES Dept.#CH	07-08-2021	11 YRS 04½ MOS
ESTELLA HERNANDEZ	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	03-01-2020	16 YRS 03 MOS
CLAUDETTE KAVANAGH	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	09-30-2021	18 YRS 00 MOS
HENRY J. KERNER	DISTRICT ATTORNEY Dept.#DA	09-24-2021	18 YRS 00 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT FROM DEFERRED

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
CHRISTOPHE G. KOCH	SUPERIOR COURT/COUNTY CLERK Dept.#SC	09-22-2021	13 YRS 09 MOS
PEGGY S. KURIHARA	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-01-2021	09 YRS 01½ MOS
WENDY LA	PUBLIC WORKS Dept.#PW	10-21-2021	12 YRS 07 MOS
JAMES MORRIS LAWSON III	MENTAL HEALTH Dept.#MH	09-21-2021	07 YRS 08 MOS
CATHY R. LOCKHART	SHERIFF Dept.#SH	09-27-2021	17 YRS 02 MOS
JOANN E. MCNEAL	SOUTHWEST CLUSTER (MLK JR MC) Dept.#HK	10-24-2021	19 YRS 02 MOS
ROBERT S. MILLER	BOARD OF SUPERVISORS Dept.#BS	10-01-2021	17 YRS 02 MOS
JESUS A. OLIVA-AGUIRR	CHILD SUPPORT SERVICES Dept.#CD	11-24-2021	22 YRS 10½ MOS
FLORA PENALES MAIL	COASTAL CLUSTER-HARBOR/UCLA MC Dept.#HH	09-13-2021	12 YRS 11 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT FROM DEFERRED

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
STACY L. PENDER-WALKE	SUPERIOR COURT/COUNTY CLERK Dept.#SC	09-27-2021	19 YRS 00 MOS
BRIAN PETTIT	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	11-01-2021	24 YRS ½ MOS
TIM B. PIASKY	PUBLIC WORKS Dept.#PW	09-29-2021	11 YRS 03 MOS
CARRIE L. SHERIDAN	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	10-01-2021	10 YRS 00 MOS
OPHELIA L. TAYLOR	WORKFORCE DEV AGING & COMM SVC Dept.#CS	09-13-2021	14 YRS 01 MOS
ANN R. TERRAZAS	SFV CLUSTER-OLIVE VIEW/UCLA MC Dept.#HO	09-30-2021	09 YRS 10 MOS
CHRISTY C. TUCK	L A COUNTY FIRE DEPT Dept.#FR	10-21-2021	14 YRS 05 MOS
KENNETH L. WARD	NORTHEAST CLUSTER (LAC+USC) Dept.#HG	09-29-2021	24 YRS 02½ MOS
WENETTA R. WEST-ALLEN	INTERNAL SERVICES Dept.#IS	09-26-2021	39 YRS 03 MOS

BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021

BENEFIT APPROVAL LIST

GENERAL MEMBER APPLICATIONS FOR: SERVICE RETIREMENT FROM DEFERRED

<u>NAME</u>	<u>DEPARTMENT</u>	<u>RETIRED</u>	<u>SERVICE</u>
DENICE R. WORSDELL	CHILDREN & FAMILY SERVICES Dept.#CH	10-21-2021	14 YRS 09 MOS

**BOARD OF RETIREMENT MEETING OF NOVEMBER 3, 2021
RESCISSIONS/CHANGES FROM BENEFIT APPROVAL LIST
APPROVED ON OCTOBER 6, 2021**

GENERAL MEMBER APPLICATIONS FOR SERVICE RETIREMENT

NAME	DEPARTMENT	UPDATE
TARA P CLARKE-MARINO	INTERNAL SERVICES	RESCINDED RETIREMENT
JOAQUIN HERNANDEZ	PROBATION DEPARTMENT	CHANGE OF DATE TO September 30, 2021
JACQUELINE M SWITZLER	L A COUNTY FIRE DEPT	RESCINDED RETIREMENT
MARIA G BADULIS	NORTHEAST CLUSTER (LAC+USC)	RESCINDED RETIREMENT
MARIA ALEMANY	SUPERIOR COURT/COUNTY CLERK	CHANGE OF DATE TO October 30, 2021
PAUL J SONG	ASSESSOR	CHANGE OF DATE TO November 27, 2021
LECHI T NGUYEN	CORRECTIONAL HEALTH	CHANGE OF DATE TO November 9, 2021



October 21, 2021

TO: Each Trustee
Board of Retirement

FROM: Ricki Contreras, Division Manager
Disability Retirement Services

SUBJECT: **APPEALS FOR THE BOARD OF RETIREMENT'S MEETING
OF NOVEMBER 3, 2021**

IT IS RECOMMENDED that the Board of Retirement grant the appeals and requests for administrative hearing received from the following applicants, and direct the Disability Retirement Services Manager to refer each case to a referee:

5183B Carlos H. Fernandez In Pro Per Deny SCD

2286C Sheila R. La Bomme In Pro Per Grant SCD

RC:kw
Memo.New
Appeals.docx



October 20, 2021

TO: Each Trustee
Board of Retirement

FROM: Ricki Contreras, Manager 
Disability Retirement Services Division

FOR: November 3, 2021 Board of Retirement Meeting

SUBJECT: **DISMISS WITH PREJUDICE THE APPEAL OF MICHAEL A. LYND**

Mr. Michael A. Lynd applied for a service-connected disability retirement on May 1, 2018. On March 12, 2020, the Board denied his application for service-connected disability retirement and granted him a nonservice-connected disability retirement with the option of an earlier effective date.

Mr. Lynd filed a timely appeal. On September 27, 2021, Mr. Lynd submitted a letter requesting to withdraw his appeal for a service-connected disability retirement.

IT IS THEREFORE RECOMMENDED THAT THE BOARD:

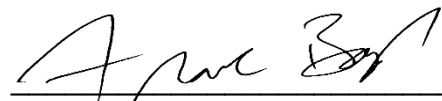
Dismiss with prejudice Michael A. Lynd's appeal for a service-connected disability retirement.

FJB: RC: mb

Lynd, Michael A.docx

Attachment

NOTED AND REVIEWED:




Francis J. Boyd, Sr. Staff Counsel

Date: 10/20/21



October 21, 2021

TO: Each Trustee
Board of Retirement

FROM: Ricki Contreras, Manager 
Disability Retirement Services Division

FOR: November 3, 2021 Board of Retirement Meeting

SUBJECT: **DISMISS WITH PREJUDICE THE APPEAL OF LINDA S. YU CHOW**

Ms. Linda S. Yu Chow applied for a service-connected disability retirement on December 4, 2019. On June 10, 2021, the Board denied her application for service-connected disability retirement and granted her a nonservice-connected disability retirement.

Ms. Yu Chow filed a timely appeal. On October 5, 2021, Ms. Yu Chow submitted a letter requesting to withdraw her appeal for a service-connected disability retirement.

IT IS THEREFORE RECOMMENDED THAT THE BOARD:

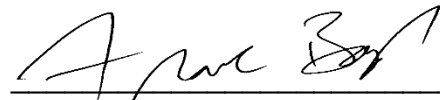
Dismiss with prejudice Linda S. Yu Chow's appeal for a service-connected disability retirement.

FJB: RC: mb

Yu Chow, Linda S.docx

Attachment

NOTED AND REVIEWED:



Francis J. Boyd, Sr. Staff Counsel

Date: 10/22/21

October 8, 2021

TO: Each Trustee
Board of Retirement

FROM: Insurance, Benefits and Legislative Committee
Les Robbins, Chair
Vivian H. Gray, Vice Chair
Shawn R. Kehoe
Ronald A. Okum
Wayne Moore, Alternate

FOR: November 3, 2021 Board of Retirement Meeting

SUBJECT: **EXTENSION OF LEGISLATIVE ADVOCACY SERVICES CONTRACT**

RECOMMENDATION

That the Board of Retirement authorize a one-year extension of the current contract—

1. With Ackler & Associates and McHugh, Koepke & Associates commencing on January 1, 2022 and ending on December 31, 2022 to provide state legislative advocacy services; and
2. With Williams & Jensen and Doucet Consulting Solutions commencing on February 1, 2022 and ending on January 31, 2023 to provide federal legislative advocacy services.

LEGAL AUTHORITY

The Board of Retirement's (BOR) oversight of legislative affairs and legislative advocacy on pension, health, and plan administration issues is within the plenary authority and fiduciary of the BOR under Section 17 of Article XVI of the California Constitution to administer the plan, giving precedence to the interest of members and their beneficiaries. Board oversight concerning these legislative issues is consistent with the BOR's Legislative Policy and Engagement Policy. The BOR has the authority to select such vendors as are needed to assist in the performance of its duties.

BACKGROUND

On November 9, 2017, the BOR approved Ackler & Associates and McHugh Koepke & Associates as LACERA's state legislative advocacy services providers. On December 14, 2017, the BOR approved Williams & Jensen and Doucet Consulting Solutions as LACERA's federal legislative advocacy services providers. The engagements were the result of Requests For Proposals (RFP) to support LACERA's legislative affairs in advocating LACERA's position and interests on state and federal legislation related to pension and retirement-related matters.

The contracts for each engagement provided for an initial three-year term with the option to renew for two additional one-year terms by LACERA. The initial term of the contract for Ackler & Associates and McHugh Koepke & Associates was set to terminate on December 31, 2020 and the contract for Williams & Jensen and Doucet Consulting Solutions on January 31, 2021. On December 2, 2020, the BOR approved the first one-year extension to both contracts.

With the impending expiration of the contract for Ackler & Associates and McHugh Koepke & Associates on December 31, 2021 and the contract for Williams & Jensen and Doucet Consulting Solutions on January 31, 2022, the contracts may be approved for a second and final one-year extension. Both contracts provide that the contract term may be terminated by LACERA with 30 days written notice or by the legislative advocates with 90 days written notice. No termination notice has been given by either LACERA or the legislative advocates.

DISCUSSION

Staff has worked with the state and federal legislative advocates on a variety of engagements since contracting their services. The legislative advocates have advised and assisted with arranging meetings with legislators, aides, and committee staff to provide education on LACERA's history and function, foster relationships, and promote visibility. Although the pandemic had adversely affected the ability to travel for in-person meetings during 2020, new public health guidelines and the advent of vaccinations have lessened restrictions in 2021 on in-person meetings. Ackler & Associates was able to arrange in-person meetings on August 17, 2021 between state legislators and LACERA's Chief Executive Officer in Sacramento.

The legislative advocates have also advised and advocated on positions of support and opposition adopted by the BOR. At the federal level, the legislative advocates continue to advocate for the repeal of the Windfall Elimination Provision and Government Pension Offset and to monitor changes to tax laws and regulations that affect retirement security and benefits. More recently, the federal advocates worked with staff on the reintroduction of the repeal of the direct payment requirement for public safety officers, which the BOR supported in 2020 under H.R. 6436, the "Police and Fire Health Care Protection Act of 2020."

At the state level, the legislative advocates have assisted LACERA in monitoring legislation on the County Employee Retirement Law of 1937 (CERL) and has kept staff updated on developments related to the pandemic, the Governor's executive orders, the Brown Act, and the COVID-19 presumption for disability retirement. Additionally, the state advocates can assist with a potential CERL amendment that staff is considering next year related to expanding new executive and managerial positions that are not subject to civil service rules.

Staff has maintained an effective working relationship with the legislative advocates and believes that they have provided quality service to LACERA. Earlier this year in January, the legislative advocates provided an informative educational presentation of legislative updates and the legislative process. In light of the fact that 2022 is the second year of the two-year session (2021-22) for the U.S. Congress and the California State Legislature and a new two-year session begins in 2023, an extension to the contracts would coincide with the end of the current two-year session and staff can begin a new RFP process for services going forward in 2023.

IT IS THEREFORE RECOMMENDED THAT THE BOARD authorize a one-year extension of the current contract—

1. With Ackler & Associates and McHugh, Koepke & Associates commencing on January 1, 2022 and ending on December 31, 2022 to provide state legislative advocacy services; and
2. With Williams & Jensen and Doucet Consulting Solutions commencing on February 1, 2022 and ending on January 31, 2023 to provide federal legislative advocacy services.

cc: Santos H. Kreimann
Luis Lugo
JJ Popowich
Laura Guglielmo
Steven P. Rice
John Harrington
Cassandra Smith
Tony Roda, Williams & Jensen
Joe Ackler, Ackler & Associates

October 22, 2021

TO: Each Trustee,
Board of Retirement
Board of Investments

FROM: Joint Organizational Governance Committee
Shawn R. Kehoe, Chair
Elizabeth Greenwood, Vice Chair
Alan J. Bernstein
Vivian H. Gray
Joseph Kelly
Keith Knox
Les Robbins
Herman B. Santos

FOR: November 3, 2021 Board of Retirement Meeting
November 17, 2021 Board of Investments Meetings

SUBJECT: Revised Code of Ethical Conduct

Recommendation

That Board of Retirement and Board of Investments approve the revised Code of Ethical Conduct.

Legal Authority

Under Article XVI, Section 17 of the California Constitution, the Board of Retirement and Board of Investments have plenary authority and exclusive fiduciary responsibility for, respectively, the administration of the system and investment of system assets, which includes governance policies such as the Code of Ethical Conduct. Under Section 7.4 of its Charter, the JOGC makes this recommendation under its authority with respect to joint policies. The Code of Ethical Conduct has previously been acted upon by both Boards as a joint policy, most recently in December 2016.

Background

At the July 21, 2021 and September 17, 2021 JOGC meetings, the JOGC reviewed the Code of Ethical Conduct. The JOGC provided comments and requested certain revisions. The JOGC also requested staff to consult with fiduciary counsel on certain issues. On September 17, the JOGC voted to recommend to the Boards the revised Code of Ethical Conduct, which includes changes from the current Code as shown in the

redlined version attached as Attachment A. A clean copy of the revised Code, with revisions accepted, is attached as Attachment B.

Discussion

Based on the discussion at the July 21 and September 17, 2021 JOGC meetings, staff made the following revisions to the current Code of Ethical Conduct, which the JOGC recommends to the Boards for approval:

Cover Letter. The existing cover letter has been deleted. The Chief Executive Officer will prepare a new cover letter once the revised Code is finalized. The cover letter will emphasize the importance of the Code and provide instructions to staff to review the document and provide an acknowledgment confirming that review.

Section I, Purpose and Scope. A specific mention of the Brown Act was added to the bullet referencing the laws applicable to LACERA and its business. In addition, the term “Board Member” was changed to “Board Trustee” throughout the Code in the interest of consistency among LACERA policies.

Section II, General Ethical Standards. References to the Brown Act and Public Records Act were added. Language was added clarifying that the obligation to report inappropriate conduct includes personal conduct as well as the conduct of other persons and entities. In connection with the issue of awareness of conflicts, language was added tying ethical obligations to “available information and reasonable due diligence and inquiry under the circumstances;” this language was added where appropriate throughout the Code.

Section III, Prohibited Transactions. Language was added clarifying that Trustees and staff may not permit the use of LACERA property for personal gain by others, as well as themselves. The language described above with respect to the awareness of conflicts was added. Additional references to Brown Act compliance were added. The duty to report misconduct by others was added in this section as above.

Section IV, Fiduciary Duty. The duty to report breaches of fiduciary duty by any person or entity known to have such a duty and about which any Trustee or staff becomes aware was added. With respect to vendors, the language was revised to clarify that LACERA as an organization shall monitor compliance of those vendors with a fiduciary duty; monitoring processes may be developed on a case-by-case basis. A requirement was added that staff shall ensure that the contracts of vendors with a fiduciary duty include a provision confirming that duty.

Section V, Conflicts of Interest. Language was added confirming the biennial review of the Conflict of Interest Code for LACERA and the separate Code for the title holding companies. Language was added confirming that the Treasurer and Tax Collector is an 87200 Filer for Form 700 purposes and that service as the Treasurer and Tax Collector is not an incompatible office with service on the LACERA Boards as an *ex officio* Trustee. Recognition was included that certain Trustees are both Code Filers and 87200 Filers and that a combined Form 700 may be filed. The gift limit was updated to \$520 for 2021-2022. Language was added clarifying the honoraria prohibition, including the law that honoraria include non-cash benefits. With respect to disclosure and recusal, the language described above was added to clarify that the obligations are based on available information and due diligence and inquiry under the circumstances. Similar language was added with respect to vendor conflicts. A change to gender neutral pronouns was made in this section, as well as throughout the Code.

Section VI, Employment of Related and Unrelated Persons. There was discussion by the JOGC about possibly relaxing this anti-nepotism provision to permit the Boards to authorize employment of related persons, with recusal of the related Trustee. The JOGC requested that fiduciary counsel be consulted. Staff and fiduciary counsel advised that relaxation of the standards create risk of potential conflict of interest prohibitions, particularly with respect to close relatives; relaxation of the standard also creates an appearance of unfairness, will place implicit, even if not express, pressure on staff to favor those potential new hires with connections to Trustees or management, and could interfere with employee performance evaluation and discipline for the same reason. Exercise of approval authority by the Boards would also create a new appointing authority role for the Boards, which would require a change to the County Salary Ordinance providing that the CEO is appointing authority. Therefore, the proposed revised Code of Ethical Conduct maintains the current scope of the anti-nepotism provision, without permitting the employment of related persons to Trustees and senior management. Language was added clarifying that the anti-nepotism policy is intended to avoid potential conflicts of interest and appearance of unfairness, and that staff's hiring of permitted related persons may not include preferential or unfair treatment.

Section VII, Contracting and Vendor Language. With respect to conflicts, the language regarding awareness and due diligence was added, as discussed above. A provision that staff provide quiet period lists was also added. Currently, quiet period lists are now provided with both the CEO and CIO reports for monthly Board meeting providing current information on open solicitations in both the

administrative and investment sides of the LACERA organization. These lists will aid in the avoidance of vendor conflicts and quiet period violations.

Section VIII, Use of LACERA Position, Resources, and Information. No substantive changes were made.

Section IX, Personal Conduct and Communication. No substantive changes were made.

Section X, Political Activities. The JOGC requested that staff consult with fiduciary counsel on this section. Fiduciary counsel advised that the LACERA policy tracks the applicable statute, Cal. Gov't Code §§ 3201 et seq., and does not require more than is required under that law. These statutes are identified in this section and linked in Section XV.H. Therefore, no substantive changes were made to this section.

Section XI, Leaving LACERA. This section describes the prospective employment rules under the Political Reform Act and the two-year revolving door rule under CERL, both of which include citations to the applicable statutes. For the sake of completeness, a description has been added of a one-year revolving door rule in the Political Reform Act applicable to elected Trustees and the CEO. The scope of prohibited activities under the one-year rule is the same as CERL's two-year rule, and therefore, it does not substantively change or add to the scope of the applicable revolving door limitations under CERL, as already stated in this section of the Code.

Section XII, Reporting. Reference to the obligation to report the conduct of others subject to the awareness and due diligence standard discussed above was added. The Ethics Hotline telephone number and online access was updated.

Section XIII, Enforcement. Reference was added to the responsibilities of and County policies applicable to the Treasurer and Tax Collector, while recognizing the independent fiduciary duties and legal obligations owed by the *ex officio* member to LACERA and its members.

Section XIV, Training. No substantive changes were made to this section.

Section XV, Resource. This section contains a comprehensive set of references to relevant statutes, guides, and other resources with respect to ethical obligations as described in the Code of Ethical Conduct. As requested by the JOGC, citations to relevant statutes are also already included in individual sections of the Code where helpful. Information regarding the Ethics Hotline telephone number and

Re: Revised Code of Ethical Conduct

October 22, 2021

Page 5 of 5

online access was updated. The link to the California Constitution was updated. A new subsection linking to the Brown Act was added. In addition, in preparing this Board memo, it was discovered that there was no link to PEPRRA, which has now been added as Section XV.G.

Section XVI, Review of Code. No substantive changes were made.

Appendix A – Summary of Gift Limitations and Restrictions. The \$520 gift limit for 2021-2022 was updated.

Conclusion

The JOGC recommends the revised Code of Ethical Conduct to the Board of Retirement and Board of Investments for approval.

Attachments

c: Santos H. Kreimann
Jonathan Grabel
Luis Lugo
JJ Popowich
Laura Guglielmo
Cynthia Martinez
Richard Bendall

Attachment A
Revised Redlined
Code of Ethical Conduct

CODE OF ETHICAL CONDUCT

Restated Revised Board of Retirement: December 15, 2016
and Approved: Board of Investments: December 14, 2016

NOTE: Once the revised Code is finalized by the Boards, the CEO will add his transmittal letter emphasizing the importance of the Code and providing staff with instruction to review and acknowledge the Code. The Board may discuss whether to also have a Board Trustee acknowledgment.

To LACERA Board ~~Members~~ Trustees and Staff:

~~LACERA holds itself to the highest ethical standards of honesty, integrity, trustworthiness, and fairness.~~

~~We must employ these principles every day in fulfilling LACERA's **Mission** to produce, protect, and provide the promised benefits. These principles are an important part of our shared **Values** of Professionalism, Respect, Open Communications, Fairness, Integrity, and Teamwork (PROFIT) and our collective **Vision** of Excellence, Commitment, Trust, and Service.~~

~~Ethics extends to all aspects of our business, including our interactions with each other inside the organization, with LACERA's members, with our plan sponsor, with vendors, with the public, and with all others.~~

~~The attached Code of Ethical Conduct provides detailed information as to the ethical standards of conduct required at LACERA. The Code addresses specific legal requirements. The Code also includes other standards rooted beyond the law in concepts of what we want to be as an organization. The Code applies equally to everyone at LACERA, including Board members and staff, because ethical lapses by any of us will reflect on all of us.~~

~~Please read the Code carefully and familiarize yourself with it. Every ethical situation you may encounter cannot be specifically addressed in such a document, and it is important that you seek additional information when needed. In this regard, the Code has sections on Reporting and Resources, including contacts for specific questions and reporting of ethical concerns.~~

~~Ethics is one of the most important criteria by which our colleagues and stakeholders will measure us. Each and every one of us has responsibility for ensuring the excellence of LACERA's ethics. Thank you for following the Code of Ethical Conduct in your work at LACERA.~~

Very truly yours,



Gregg Rademacher Santos H. Kreimann

Chief Executive Officer

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APPENDIX A – SUMMARY OF GIFT LIMITATIONS AND RESTRICTIONS

I. Purpose and Scope

The Los Angeles County Employees Retirement Association (LACERA) is a public pension plan organized under the County Employees Retirement Law of 1937 (CERL) (Cal. Gov't Code §§ 31450 et seq.) and the California Public Employees' Pension Reform Act of 2013 (PEPRA) (Cal. Gov't Code §§ 7522 et seq.). The management and administration of LACERA are vested in the Board of Retirement. All investments of LACERA are the responsibility of the Board of Investments.

The ~~members~~ Trustees of the LACERA Boards are mindful of the positions of trust and confidence they hold. The Boards adopt this Code of Ethical Conduct to define standards of ethical conduct required of LACERA Board ~~members~~ Trustees and staff. The purpose of the Code is to ensure the proper administration of LACERA and to foster public confidence in LACERA's institutional integrity as a well-managed public pension system.

"Ethics" and "ethical conduct" are defined for purposes of this Code as conduct that complies with principles of honesty, integrity, trust, fairness, and duty in connection with LACERA's business as a public pension fund. This Code looks to three sources for determination of ethical standards:

- First, laws and regulations applicable to LACERA and its business, Board ~~members~~ Trustees, and staff, including the California Constitution, CERL, the Political Reform Act and the regulations adopted thereunder, the Ralph M. Brown Act, and other statutes, regulations, and case law.
- Second, best practices of ethical conduct. Best practices are drawn from ethical codes and practices of other public pension systems in California and elsewhere, professional associations, and similar sources.
- Third, LACERA's **Mission, Values, and Vision**, historical LACERA practices, and judgment as to the moral principles and behavior that LACERA as an organization strives to follow.

This Code provides ethical standards for LACERA Board ~~members~~ Trustees and staff. The Code provides specific guidance for common situations raising ethical issues. However, the Code does not specifically address every issue that Board ~~members~~ Trustees and staff will encounter. As to those other situations, the Code should be used and followed as a reference for standards of conduct and the basis for evaluation of facts and circumstances. The Code requires that additional information be requested when a user is unsure as to how the Code should be interpreted or when a user encounters an ethical issue not covered in the Code.

This Code is important:

- To ensure legal compliance with ethics laws and regulations.

- To further best ethical business practices.
- To establish an organization-wide culture and accountability for ethics.
- To foster trust, credibility, and positive relationships between LACERA and all parties necessary for the effective performance of LACERA's **Mission to produce, protect and provide the promised benefits**. These parties include others inside the organization, members, the plan sponsor and other participating employers, vendors, the public, and all others with whom LACERA may deal.
- To further LACERA's **Values** and **Vision**, which incorporate ethics, honesty, integrity, fairness, and trust.
- To establish common ethical standards followed by everyone at LACERA, instead of leaving ethics to unguided and possibly inconsistent personal judgment and interpretation.
- To mitigate the legal and business risks associated with ethical issues.
- To further the organization's business goals and objectives.
- To confirm the process for reporting or raising ethical concerns or questions.
- To identify resources for additional information concerning ethics and the applicable laws and regulations.

The Code shall not be construed as the sole source of ethics laws and regulations which must be observed by LACERA Board ~~members~~Trustees and staff. Nothing in this Code shall exempt any person from any other applicable federal, state, or local law or regulation. The standards of ethical conduct in this Code are in addition to any such other laws and regulations.

II. General Ethical Standards

This Code addresses specific ethical requirements in subsequent sections. The application of those specific requirements is summarized in this Section II as General Ethical Standards.

The following General Ethical Standards apply to LACERA Board ~~members~~ Trustees and staff:

- Recognize and be accountable for all fiduciary responsibilities.
- Comply with all applicable laws and regulations, including those listed in Section I and elsewhere in this Code or which may be determined to be applicable in individual circumstances.
- Further the interests of transparency in the conduct of the public's business as described in the Ralph M. Brown Act and Public Records Act.
- Conduct all LACERA business in a fair ~~manner~~, and manner and be honest in all business dealings.
- Strive to provide the highest quality of performance and counsel.
- Avoid any activity which, based on available information and reasonable due diligence and inquiry under the circumstances, constitutes an actual conflict of interest or which could be perceived or interpreted as a conflict of interest by others.
- Avoid exerting improper influence or being improperly influenced, and the appearance of improper influence or being improperly influenced.
- Exercise prudence and integrity in the management of funds.
- Report to an appropriate person actions of themselves or other persons or entities of which they become aware or suspect based on available information and reasonable due diligence and inquiry under the circumstances which may constitute violations of this Code of Ethical Conduct.
- Be responsible for maintaining professional competence.
- Be respectful, professional, and courteous to all LACERA Board ~~members~~ Trustees and staff, LACERA members, and all persons and entities with which LACERA does business or may otherwise interact.
- Maintain the confidentiality of all plan member information and all other confidential or privileged information so designated, including but not limited to information provided for or related to closed sessions of the Boards, which is

received from or created or maintained by LACERA.

- To the extent not otherwise covered by the preceding bullets, conduct LACERA business in a manner consistent with:
 - LACERA's **Mission** *to produce, protect, and provide the promised benefits.*
 - LACERA's **Values** of *Professionalism, Respect, Open Communications, Fairness, Integrity, and Teamwork.*
 - LACERA's **Vision** of *Excellence, Commitment, Trust, and Service.*
 - All other applicable LACERA policies and procedures.
- Report or seek additional information from an appropriate person, when necessary, concerning ethical questions and issues.

III. Prohibited Transactions

The specific ethical requirements in subsequent sections of the Code define and describe certain prohibited conduct. Those prohibitions are summarized in this Section III as Prohibited Transactions.

LACERA Board ~~members~~ Trustees and staff shall not engage in the following Prohibited Transactions:

- Utilizing or permitting others to use any property, resources, information, or opportunity of LACERA for personal gain.
- Engaging in any activity or failing to disclosure any activity which, based on available information and reasonable due diligence and inquiry under the circumstances, constitutes an actual conflict of interest or which could be perceived or interpreted by others as a conflict of interest in the impartial and objective execution of duty to LACERA and its members.
- Falsifying or failing to record proper entries on any books or records of LACERA.
- Engaging in serial meetings or other conduct in violation of the Ralph M. Brown Act.
- Knowingly becoming a party to, or condoning, any illegal activity, including failing to report the misconduct under this Code of themselves or other persons or entities.
- Authorizing payment of any amount on behalf of LACERA, or for any purpose, other than that explicitly disclosed in the original request for payment.
- Directly or indirectly seeking or accepting gifts, money, property, or other benefit that would influence or appear to influence the conduct of duties.
- ~~Engaging in or conducting outside activities or offices of financial or personal interest that may conflict with the impartial and objective execution of LACERA business activities.~~
- Selling or providing goods or services to LACERA without disclosure.
- Utilizing the services of relatives or close personal associates for LACERA business without disclosing such relationship prior to execution and obtaining the appropriate approval.
- Engaging in activities involving dishonesty, fraud, deceit or misrepresentation.
- Engaging in outside employment with any providers of supplies or services to LACERA.

- Engaging in outside employment that would interfere with or hamper expected performance at LACERA.
- Engaging in other activities which compromise or appear to compromise one's objectivity in the conduct of one's duties.
- Releasing to any third person plan member information or other confidential or privileged information so designated, including but not limited to [member information and information](#) provided for or related to closed sessions of the Boards [protected by the Ralph M. Brown Act](#), which is received from or created or maintained by LACERA.
- Engaging in any other conduct prohibited by this Code of Ethical Conduct, [Board or LACERA policy](#), or applicable laws and regulations.

IV. Fiduciary Duties

~~Members-Trustees~~ of LACERA's Board of Retirement and Board of Investments have fiduciary duties under the California Constitution and other law. LACERA as an organization also has fiduciary duties, which are implemented through LACERA's employees. Finally, certain of LACERA's vendors have a fiduciary duty to LACERA. This Section IV addresses all three categories of fiduciary duty. Board Trustees and staff shall report actions of which they become aware or suspect based on available information and reasonable due diligence and inquiry under the circumstances that may constitute a breach of fiduciary duty by any person or entity known to have such a duty.

A. Fiduciary Duties of Board ~~Members~~Trustees

The California Constitution, Article XVI, Section 17, defines the fiduciary duties of the LACERA Boards, and the Board ~~members~~Trustees:

- The Boards "shall have plenary authority and fiduciary responsibility for investment of moneys and administration of the system."
- The Boards "shall have the sole and exclusive fiduciary responsibility over the assets of the system. The retirement board also has sole and exclusive responsibility to administer the system in a manner that will assure prompt delivery of benefits and related services to the participants and their beneficiaries. The assets of a public pension or retirement system are trust funds and shall be held for the exclusive purposes of providing benefits to participants in the pension or retirement system and their beneficiaries and defraying reasonable expenses of administering the system."
- The ~~members-Trustees~~ of the LACERA Boards "shall discharge their duties solely in the interest of, and for the exclusive purposes of providing benefits to, participants and their beneficiaries, minimizing employer contributions thereto, and defraying reasonable expenses of administering the system. A retirement board's duty to its participants and their beneficiaries shall take precedence over any other duty."
- The member of the LACERA Boards "shall discharge their duties with the care, skill, prudence, and diligence under the prevailing circumstances that a prudent person acting in a like capacity and familiar with these matters would use in the conduct of an enterprise with a like character and like aims."
- As to the Board of Investments, the ~~members-of-the-Board~~Trustees "shall diversify the investments of the system so as to minimize the risk of loss and to maximize the rate of return, unless under the circumstances it is clearly not prudent to do so."

These duties are also included in Section 31595 of CERL.

California case law provides that the Boards and the Board ~~members~~Trustees have a trust relationship with LACERA's members and beneficiaries. This trust relationship means that the Boards and the Board ~~members~~Trustees have a fiduciary duty of prudence and loyalty to members and beneficiaries, which must be exercised in good faith. Further, the Boards and the Board ~~members~~Trustees have a duty to deal fairly with the members and beneficiaries, without the slightest misrepresentation, concealment, threat, or adverse pressure. *Hittle v. Santa Barbara County Employees Retirement Assn.* (1985) 39 Cal.3d 374.

To perform their fiduciary duties, each member of the LACERA Boards shall diligently attend to the business of the Board on which he or she serves, and shall not leave to the other ~~members of the Board~~Trustees control over the administration of the affairs of such Board.

B. Fiduciary Duties of LACERA, and Staff's Role

LACERA as an organization has the same fiduciary duties. LACERA staff supports the organization, the LACERA Boards, and Board ~~members~~Trustees in the fulfillment of their fiduciary duties as described in Section IV(A) of this Code. Accordingly, LACERA staff shall be familiar with the fiduciary duties described in Section IV(A) and conduct themselves at all times in a manner consistent with those duties. LACERA staff shall take no action inconsistent with those duties. LACERA staff shall avoid any conduct which is, or may be perceived to be, detrimental to LACERA and its members and beneficiaries. In dealing with members, LACERA staff shall be honest and forthright. Staff shall ensure that the information provided to members in connection with their rights, questions, choices and decisions, concerns, and issues is complete and accurate.

C. Fiduciary Duties of Certain Vendors

Certain LACERA vendors have a fiduciary duty to the organization under applicable law or under the terms of a contract with LACERA. LACERA ~~Board members and staff~~ shall ~~be aware of~~monitor those vendors that owe a fiduciary duty ~~and monitor them~~ to ensure that the vendors comply with that duty. Staff shall ensure that the contract of any vendor with a fiduciary duty includes a provision confirming that duty.

V. Conflicts of Interest

LACERA Board ~~members-Trustees~~ and staff shall avoid conflicts of interest, including the appearance of conflicts of interest, in all aspects of their work for LACERA and shall comply with applicable laws and regulations relating to conflicts.

A. Form 700 Statement of Economic Interests

Public officials, including LACERA Board ~~members-Trustees~~ and certain staff, who make or influence governmental decisions are required to submit Form 700 Statements of Economic Interests. Form 700s are an important tool in the identification of actual or potential conflicts of interest by LACERA Board ~~members-Trustees~~ and staff. Form 700s are public documents. LACERA Board ~~members-Trustees~~ and designated staff, as generally described below, shall file Form 700s when and as required by applicable law and regulations, which are generally summarized here. Additional information can be obtained from LACERA's Legal Office and from Fair Political Practices Commission publications.

Pursuant to California's Political Reform Act, LACERA's Boards have adopted, and the County of Los Angeles Board of Supervisors has approved as code reviewing authority, a Conflict of Interest Code that requires the filing of a Form 700 by positions "which involve the making or participation in the making of decisions which may foreseeably have a material effect on any financial interest," except positions which manage public investments. Cal. Gov't Code § 87302(a). Persons, including ~~members-Trustees~~ of the Board of Retirement and identified staff, who file under an agency-adopted Conflict of Interest Code are referred to as "Code Filers." LACERA's Conflict of Interest Code sets forth the positions of all Code Filers and describes the specific economic interest Disclosure Categories that apply to each position.

There is also a separate Conflict of Interest Code for staff who serve as officers or hold other positions in LACERA's wholly-owned title holding entities.

[The LACERA and title holding entity Conflict of Interest Codes are subject to biennial review.](#)

Separate provisions of the Political Reform Act require positions managing public investments to file a Form 700. Cal. Gov't Code § 87200. Persons who file under Section 87200, including ~~members-Trustees~~ of the Board of Investments, the Los Angeles County Treasurer and Tax Collector as an ex officio member of both Boards, and identified staff, are referred to as "87200 Filers." 87200 Filers are required to disclose investments, interests in real property, income (including gifts, loans, and travel payments), and business positions as described in Form 700 and the Political Reform Act. While 87200 Filers are not subject to LACERA's Conflict of Interest Codes, they are listed as a matter of information in the Appendix to LACERA's Code.

Form 700s shall be filed, both by Code Filers and 87200 Filers, upon assuming an applicable position, annually thereafter, and on leaving an applicable position. [Certain](#)

[Board Trustees and staff are Code Filers and 87200 Filers in different capacities and may complete a combined Form 700.](#) Form 700s shall be filled out by all required filers in a timely, accurate, and thorough and complete manner.

B. Gifts, Honoraria, Travel & Loans

The Political Reform Act, and Regulations promulgated thereunder by the Fair Political Practices Commission (FPPC), impose limitations on gifts, honoraria, travel, and loans. The legal rules associated with gifts, honoraria, travel, and loans are lengthy and detailed. Additional information can be obtained from LACERA's Legal Office and from FPPC publications. A summary of the general standards with respect to these matters is as follows:

Gifts. LACERA Board of Retirement ~~members-Trustees~~ and staff who are Code Filers are prohibited from receiving gifts totaling more than the legally established gift limit from any single source in a calendar year; if receipts of gifts from that source are required to be disclosed on Form 700 by LACERA's Conflict of Interest Code. LACERA Board of Investments ~~members-Trustees~~ and staff who are 87200 Filers may not accept gifts totaling more than the legally established limit from any single source in a calendar year. Even if a gift is not subject to Form 700 reporting or the gift limit, a gift may still create a conflict of interest; therefore, LACERA requires Board ~~members-Trustees~~ and all staff shall make disclosure to the Legal Office of all gifts from a single source with a combined total equal to or greater than \$50 in a calendar year from any individual or entity. Gifts to family members are included in the gift rules under certain circumstances. There are also exceptions to the gift rules for certain gifts; questions should be addressed to LACERA's Legal Office or the FPPC. The gift limit is adjusted biennially. The gift limit for ~~2015-2016 is \$460; the limit for 2017-2018 is \$470~~ 2021-2022 is \$520; the limit for any date after December 31, ~~2018~~ 2022 should be confirmed with the LACERA Legal Office or the FPPC. Gifts from a single source with a combined total less than \$50 in a calendar year currently are not reportable under FPPC law and regulations; gifts equal to or in excess of this limit are subject to reporting on Form 700, subject to the requirements and limitations described above. A more detailed SUMMARY OF GIFT LIMITATIONS AND RESTRICTIONS is attached as Appendix A.

Honoraria. LACERA Board of Retirement ~~members-Trustees~~ and staff who are Code Filers are prohibited from receiving honoraria from any source in consideration for any speech, article published, or attendance at any public or private conference, convention, meeting, social event, meal, or like fathering, if receipts of gifts from that source are required to be disclosed on Form 700 by LACERA's Conflict of Interest Code. LACERA Board of Investments ~~members-Trustees~~ and staff who are 87200 Filers may not accept any honoraria payments. There are certain exceptions to the honoraria rules; questions should be addressed to LACERA's Legal Office or the FPPC. Even if an honorarium is not subject to disclosure, Board ~~members-Trustees~~ and staff shall make disclosure to the Legal Office of such a payment from any individual or entity as to which

LACERA will take any action. Honoraria include money, advances, reimbursements, and gifts of any other type that have more than nominal value.

Travel. Payments or reimbursement for travel are subject to the reporting requirements for gifts and income. If a travel payment is a gift, it is subject to the gift limit. A travel payment can also be considered an honorarium. Recusal may be required from any decision that will have a materially foreseeable financial effect on the source of a travel payment. There are exceptions to the travel rules; additional information can be obtained from LACERA's Legal Office or the FPPC.

Loans. 87200 Filers and elected members-Trustees of the Boards may not receive a personal loan that exceeds \$250 at any given time from an officer, employee, member, or consultant of LACERA or from any individual or entity that has a contract with LACERA. Ordinary retail loans and credit card transactions are excepted if they are offered on the same terms as generally available to the public. Elected members-Trustees of the Boards may not receive a loan of \$500 or more unless the loan is made in writing and clearly states the terms. There are other limitations and exceptions. A loan can constitute a gift under certain circumstances. Additional information is available from LACERA's Legal Office or the FPPC.

Board members-Trustees and staff are prohibited from soliciting any gift or any other consideration (including but not limited to money, service, gratuity, favor, entertainment, hospitality, loan, or other thing of value) from anyone who is doing or is seeking to do business of any kind with LACERA.

Board members-Trustees and staff are prohibited from accepting any gift from anyone who is doing or is seeking to do business of any kind with LACERA, when the gift is offered with a view toward securing favorable treatment in the awarding of any contract or agreement, or the making of any determination.

All rules relating to gifts, honoraria, travel, and loans are subject to change by the FPPC and other authority. Confirmation of the current rules can be obtained from LACERA's Legal Office or the FPPC.

C. Incompatible Activities/Incompatible Offices

LACERA Board members-Trustees and staff shall not engage in any employment, activity, or enterprise which is inconsistent, incompatible, in conflict with, or inimical to his or her duties for or on behalf of LACERA, or with the duties, functions, or responsibilities of the position he or she occupies for LACERA. LACERA Board members-Trustees and staff shall not perform any work, service, or counsel outside his or her responsibilities for LACERA where any part of his or her efforts will be subject to approval by the Boards or any employee of LACERA acting in that capacity. Cal. Gov't Code § 1126.

Board ~~members-Trustees~~ may not simultaneously hold two public offices where the functions of the offices are inconsistent or where there are conflicting interests. Cal. Gov't Code § 1199. The Los Angeles County Treasurer and Tax Collector holds that position as well as, under CERL, positions as a member of both the Board of Retirement and Board of Investments; these are not incompatible offices.

D. Contracts

LACERA Board ~~members-Trustees~~ and staff shall not be financially interested, directly or indirectly, in any contract made between LACERA and any individual or entity. The making of a contract includes any participation whatsoever, including the development of the need for the goods or services subject to the contract, issuance of a Request for Proposals (RFP), Request for Information (RFI), purchase order, or other solicitation or contracting process, evaluation of prospective contracting parties, selection of contracting parties, negotiation of the terms of the contract, and performance of the contract. Cal. Gov't Code § 1090 et seq.

E. Investments

LACERA Board ~~members-Trustees~~ and staff shall not have any personal interest, direct or indirect, in the making of any investment by LACERA, or in the gains or profits from any investment. Board ~~members-Trustees~~ and staff shall not, directly or indirectly, for ~~himself or herselfthemselves~~, or as an agent or partner of others, sell or provide any investment product to LACERA. Cal Gov't Code § 31528 (a), (b).

F. Disclosure and Recusal

LACERA Board ~~members-Trustees~~ and staff shall disclose actual or potential conflict of interest, based on available information and reasonable due diligence and inquiry under the circumstances, or the appearance of an actual or potential conflict of interest, to the Chief Executive Officer and the Legal Office. Board ~~members-Trustees~~ and staff shall recuse themselves from involvement, consideration, and decision of a matter as to which the member has an actual conflict of interest. Recusal, or disqualification, is mandatory in certain circumstances, and discretionary in others. Board ~~members-Trustees~~ and staff should consider recusing themselves from consideration and decision of a matter as to which the member has a potential conflict of interest, or the appearance of an actual or potential conflict of interest. Board ~~members-Trustees~~ and staff shall consult with the Legal Office on any issue of recusal to discuss legal requirements that may apply to the particular circumstances, including whether recusal is required, whether recusal is an effective remedy for a conflict or potential conflict or whether other steps (up to and including disqualification of an individual or the Board) are necessary, and the way in which recusal, if possible, should be documented.

G. Conflicts of Interest by Vendors

LACERA's contracts shall include appropriate provisions to ensure that there are no conflicts of interest during the contracting process and to prevent conflicts of interest

during the term of a contract. Board ~~members~~Trustees and staff should be alert to, and take other appropriate steps to prevent, actual or potential conflicts of interest of which they are aware or suspect based on available information and reasonable due diligence and inquiry under the circumstances by vendors in connection with the making or performance of contracts.

VI. Employment of Related and Unrelated Persons

To avoid nepotism or the appearance of nepotism, including the potential conflicts of interest and appearance of unfairness that may result, LACERA may not employ a person who is related to:

- A Board ~~member~~Trustee.
- The Chief Executive Officer.
- Persons serving as Deputy Chief Executive Officer, an Assistant Executive Officer, and any other employee reporting directly to the Chief Executive Officer.
- A division manager.

This prohibition does not prevent the continued employment of a person who has already been working for LACERA in a full time and non-probationary capacity for thirty consecutive days prior to the date the Board ~~member~~Trustee or other individual described above acquired their position, or the related party became related. If a related party is retained under these circumstances, any actual or potential conflict of interest must still be corrected or sufficiently mitigated.

Related parties of other LACERA staff may be considered for employment by LACERA provided the applicant possesses all the qualifications for employment and that no preferential or unfair treatment is given based on any relationship. Such a related party may not be hired for or assigned to a position which would either:

1. Create either a direct or indirect supervisor/subordinate relationship with a related party; or
2. Create either an actual conflict of interest or the appearance of a conflict of interest.

These criteria will also be considered when assigning, transferring, or promoting a staff member.

For purposes of this policy, “related parties” include:

- Spouse, parent or grandparent, child or grandchild, or sibling.
- First degree aunt, uncle, niece, nephew or cousin.
- Any “step” or “in-law” variant of the aforementioned relationships.
- Any member of the employee’s household, whether or not related.

A LACERA Board ~~member~~Trustee or staff may not exercise individual discretionary authority to hire, evaluate or promote a related party under any circumstances, even

when otherwise permitted under the standards above.

| Board ~~members~~Trustees and staff may participate in the hiring process for any person, whether related or unrelated, only in accordance with established LACERA policies and procedures and shall not use or attempt to use influence outside of their individual hiring authority to cause the organization to hire any individual as a permanent or temporary LACERA employee. Board ~~members~~Trustees and staff may refer individuals interested in potential employment to LACERA's Human Resources.

VII. Contracting and Vendor Relationships

LACERA Board ~~members-Trustees~~ and staff shall not have contact with individuals or entities who are or should be reasonably known, based on available information and reasonable due diligence and inquiry under the circumstances, are seeking engagement by LACERA in response to an RFP, RFI, purchase order, or other solicitation or contracting process, except in accordance with the published terms of the contracting process or except for, and limited to, contact necessary in connection with ongoing LACERA business with an individual or entity.

LACERA's RFPs, RFIs, and other contract solicitations shall include notice that a "quiet period" will be in place from the beginning of the contracting process until the selection of the successful party such that LACERA Board ~~members-Trustees~~ and staff, as well as potential contracting parties, are instructed that contact between Board ~~members-Trustees~~ and staff, on the one hand, and all potential contracting parties, on the other hand, shall not occur, except as provided in the preceding paragraph. As part of the contracting process, potential contracting parties shall be required to disclose potential conflicts of interest. LACERA staff shall provide quiet period lists to Board Trustees and staff in monthly Board of Retirement and Board of Investments meeting packets to assist in compliance.

LACERA Board ~~members-Trustees~~ and staff shall participate in the contracting process only in accordance with established LACERA policies and procedures, and the published terms of the process. Board ~~members-Trustees~~ and staff shall not use or attempt to use influence, outside of their individual authority to cause the organization to enter into a contract with any individual or entity. Board ~~members-Trustees~~ and staff may refer individuals or entities for consideration for contracting to the appropriate LACERA staff responsible for the particular procurement or contract process.

VIII. Use of LACERA Position, Resources, and Information

LACERA Board ~~members-Trustees~~ and staff shall not use their position or status with LACERA, LACERA property, funds, or other resources, or LACERA information, including plan member information, investment information, and other information concerning LACERA's business, for any personal purpose or gain, to secure any special privilege or exemption for ~~himself or herself~~themselves or any other individual or entity, or to assist or further the interests of any other individual or entity except in the normal course of LACERA's business. LACERA position, resources and information are to be exclusively used for LACERA business.

Board ~~members-Trustees~~ and staff shall maintain the confidentiality of plan member information. Cal. Gov't Code § 31532.

Disclosures of public LACERA information pursuant to the Public Records Act shall be handled by the Legal Office to ensure compliance with legal requirements, consistency, and proper recordkeeping.

Board ~~members-Trustees~~ and staff shall not disclose information acquired during a closed session of the Board unless the Board takes action to authorize disclosure. Cal. Gov't Code § 54963.

Board ~~members-Trustees~~ and staff shall not, directly or indirectly, for ~~himself or herself~~themselves, or as an agent or partner of others, borrow or use any of the funds or deposits of LACERA, except to make authorized current and necessary payments of the retirement system. Cal. Gov't Code § 31528(a).

IX. Personal Conduct and Communication

LACERA Board ~~members~~Trustees and staff shall adhere to the following standards in their personal conduct in performing their work on behalf of LACERA:

- Board ~~members~~Trustees and staff shall conduct themselves in accordance with this Code of Ethical Conduct.
- Board ~~members~~Trustees and staff shall abide all applicable laws and regulations.
- Board ~~members~~Trustees and staff shall act in a manner consistent with LACERA's **Mission, Values, and Vision** and shall follow all LACERA policies and procedures.
- Board ~~members~~Trustees and staff shall treat similarly situated individuals and entities in a similar way, absent good cause, in the conduct of LACERA's business and decision-making to ensure consistency and fairness.
- Board ~~members~~Trustees and staff shall communicate with, orally and in writing, and otherwise in all respects and at all times treat each other and all others in a respectful, professional, courteous, and civil manner.

A Board ~~member~~Trustee shall not correspond with a non-LACERA person or entity using LACERA letterhead unless the communication is authorized by the Board on which the member serves. Copies of all written communications from a Board ~~member~~Trustee to a current service provider, or person or entity related to a current service provider, relating to LACERA's business (other than purely personal or social correspondence) shall be provided to the Chief Executive Officer for subsequent distribution to all ~~members~~Trustees of the Board on which the ~~member~~Trustee serves. A copy of any written communication (other than purely personal or social correspondence, routine announcements, generally distributed newsletters, and the like) received by a Board ~~member~~Trustee from a current LACERA service provider, or person or entity related to a current service provider, shall be forwarded to the Chief Executive Officer for subsequent distribution to all ~~members~~Trustees of the Board on which the ~~member~~Trustee serves. For purposes of this paragraph, the terms "communication" and "written communication" include email and other forms of electronic communication as well as physical or hard copy forms of communication.

Board ~~members~~Trustees and staff shall be aware of the risk of communicating inaccurate information to plan members. Board ~~members~~Trustees and staff shall refrain from providing specific advice or counsel with respect to a plan member's rights, benefits, or obligations, except staff who are authorized to communicate with members on such matters. All others should refer plan member questions and concerns to the Chief Executive Officer or appropriate designee.

X. Political Activities

LACERA Board ~~members~~Trustees and staff may work on individual candidate and ballot campaigns, and attend campaign events, during their personal time. They may make campaign contributions using personal funds, subject to applicable campaign finance laws. No LACERA funds, property, technology, letterhead, logo, or other resources may be used by LACERA Board ~~members~~Trustees and staff to support personal political activities. LACERA Board ~~members~~Trustees and staff may not solicit political contributions to a candidate or ballot campaign from other Board ~~members~~Trustees and staff except (1) as part of a solicitation that is made to a significant segment of the public or (2) with respect to a ballot measure which would affect the rate of pay, hours of work, retirement, civil service, or other working conditions of LACERA employees; solicitations permitted by these two exceptions may only be made on personal time. LACERA Board ~~members~~Trustees and staff may not use their influence or make any threats or promises relating to potential or current employment, promotion, or compensation to secure a vote or financial or other support for a candidate or ballot campaign. Cal. Gov't Code §§ 3201 et seq. LACERA Board ~~members~~Trustees and staff may use their LACERA position to identify themselves when making an endorsement, provided that no statement may be made or action taken directly or indirectly indicating that the person represents LACERA in making the endorsement or that the endorsement is supported by or represents the position of LACERA, except when providing information authorized by the Boards. Nothing in this section is intended to impose any limitation on the personal political activities of LACERA Board ~~members~~Trustees and staff not permitted by California law.

XI. Leaving LACERA

A. Prospective Employment

LACERA Board ~~members~~Trustees and all staff shall not make, participate in making, or influence a decision by LACERA that directly relates to a nongovernmental prospective employer while negotiating or after reaching an employment agreement. The foregoing prohibition is triggered by an interview with a nongovernmental prospective employer or a nongovernmental prospective employer's agent, discussing an offer of employment with a nongovernmental prospective employer or a nongovernmental prospective employer's agent, or accepting an offer of employment. The foregoing prohibition does not apply if the Board ~~member~~Trustee or staff is legally required to make or participate in the making of the decision or if the decision affects the nongovernmental prospective employer in substantially the same way as it will affect a significant segment of the public generally. Cal. Gov't Code § 87407.

B. Limitations on Subsequent Activities

LACERA Board ~~s~~membersTrustees, the Chief Executive Officer, Deputy Chief Executive Officer, Assistant Executive Officers, persons next in line to Assistant Executive Officers, Chief Counsel, chief deputy legal officers, the Chief Investment Officer, and persons next in line to the Chief Investment Officer shall not, for two years after leaving that position, for compensation, act as agent or attorney for, or otherwise represent, any person except the County of Los Angeles, by making any formal or informal appearance before, or any oral or written communication to, LACERA, or any Board ~~member~~Trustee or employee of LACERA, for the purpose of influencing action by LACERA, including any action involving the awarding or issuance of a contract or sale or purchase of goods or property. Cal. Gov't Code § 31528(c).

In addition, under Government Code Section 87406.3, elected Trustees and the CEO shall not, for a period of one year after leaving that office or employment, act as agent or attorney for, or otherwise represent, for compensation, any other person, by making any formal or informal appearance before, or by making any oral or written communication to, LACERA, the Boards, or any committee of the Boards, or any LACERA officer or employee if the appearance or communication is made for the purpose of influencing action by LACERA involving the issuance, amendment, awarding, or revocation of a contract or the sale or purchase of goods or property.

XII. Reporting

Reporting of ethical issues with respect to their own conduct or the conduct of others of which they become aware or suspect based on available information and reasonable due diligence and inquiry under the circumstances is an important element of ensuring compliance with ethical requirements. Any such concerns by Board ~~members~~ Trustees and staff about possible violations of this Code of Ethical Conduct or other ethical issues by themselves or others shall be reported to the Chief Executive Officer, the Chief Audit Executive, or Chief Counsel. Board ~~members~~ Trustees may also report concerns to their Board Chair. Staff may also report ethical issues to their immediate supervisor or division manager.

Concerns may be reported anonymously at the Internal Audit LACERA Ethics Hotline, which may be reached externally at (626) 564-6000, extension 2040, or internally by dialing extension 2040 directly by telephone at (844) 794-9416 or online at lacera.ethicspoint.com.

XIII. Enforcement

LACERA's Chief Executive Officer is responsible for communicating, implementing and enforcing the Code of Ethical Conduct with respect to LACERA staff. The Board Chairs will enforce this Code with respect to Board ~~members~~ Trustees and the Chief Executive Officer in accordance with Board administrative policies and applicable laws.

Violations of any of the provisions of the Code by staff may result in disciplinary action as the situation may warrant, up to and including termination of employment. Violations by Board ~~members~~ Trustees will be handled in accordance with Board Regulations, Bylaws, and policies and applicable law.

With respect to the Los Angeles County Treasurer and Tax Collector, application of this Code shall take into account their responsibilities in that position and Los Angeles County policies applicable to the position, while recognizing that the Treasurer and Tax Collector has separate and independent fiduciary duties and legal obligations to LACERA and its members as described in this Code.

Questions on this matter should be referred to LACERA's Director of Human Resources, Internal Audit, or the Legal Office.

XIV. Training

LACERA management will provide training to new staff on this Code of Ethical Conduct as part of the new employee orientation. Management will provide training to existing staff on this Code at least every two years.

Management will include discussion of this Code in the training for new and incoming Board ~~members~~Trustees. The Code will be circulated to all Board ~~members~~Trustees at least every two years.

XV. Resources

Board ~~members-Trustees~~ and staff may refer to the following resources for additional information concerning this Code, questions concerning the application and interpretation of the Code to specific situations, and other issues concerning ethics and ethical conduct relevant to the performance of their duties and work for LACERA and its members and beneficiaries.

A. LACERA's Legal Office

The LACERA Legal Office is familiar with the laws and regulations that form the foundation for this Code. The Legal Office is experienced in applying those laws and regulations to specific situations. The Legal Office is available at any time to provide additional information concerning ethics questions and issues and provide written or oral advice or opinions with respect to specific situations. The Legal Office will respond to information about potential ethical issues, concerns, and violations in the LACERA organization and take appropriate action. Questions for the Legal Office should be directed to LACERA's Chief Counsel.

B. LACERA's Internal Audit Division/~~Audit Ethics~~ Hotline

LACERA's Internal Audit Division will respond to information concerning ethical issues, problems, and concerns regarding acts or omissions in connection with LACERA's operations and will take appropriate action. Questions for the Internal Audit Division should be directed to LACERA's Chief Audit Executive. The Internal Audit Division may also be contacted anonymously on the ~~Internal Audit~~[LACERA Ethics](#) Hotline, which may be reached ~~externally at (626) 564-6000, extension 2040, or internally by dialing extension 2040 directly by telephone at (844) 794-9416 or online at lacera.ethicspoint.com.~~

C. LACERA's Conflict of Interest Code

Board ~~members-Trustees~~ and staff should refer to LACERA's current Conflict of Interest Code, which is available on LACERA's website, www.lacera.com, with respect to LACERA's requirements for the filing of Form 700 Statements of Economic Interests.

D. California Constitution

The California Constitution, Article XVI, Section 17, which sets forth the fiduciary duties of the Board and Board ~~members-Trustees~~ and the retirement system, is available on line at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CONS&division=&title=&part=&chapter=&article=XVI https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CONS§ionNum=SEC.%2017.&article=XVI.

E. CERL

CERL, California Government Code §§ 31450 et seq., is available online at https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=GOV&division=4.&title=3.&part=3.&chapter=3.&article=.

F. PEPRA

PEPRA, California Government Code §§ 7522 et seq., is available online at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=7.&title=1.&part=&chapter=21.&article=4.

F.G. California Government Code Section 1090 et seq.

Conflict of interest rules relating to financial interest in the making of contracts, incompatible activities, and incompatible offices are contained in California Government Code Section 1090 et seq., which is available online at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=4.&title=1.&part=&chapter=1.&article=4.

G.H. California Government Code Section 3201 et seq.

Rules regarding political activities are contained in California Government Code Section 3201 et seq., which is available online at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=4.&title=1.&part=&chapter=9.5.&article=.

I. The Brown Act

The Brown Act may be found online at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=2.&chapter=9.&part=1.&lawCode=GOV&title=5.

H.J. Other California Statutes

Other California statutes relating to ethics issues are available online at <https://leginfo.legislature.ca.gov/faces/codes.xhtml>.

I.K. Fair Political Practices Commission

The California Fair Political Practices Commission (FPPC) has a large number of resources available concerning ethics issues under the Political Reform Act, FPPC Regulations, and related law. FPPC resources include:

1. Website: www.fppc.ca.gov/.
2. FPPC Publications available on the website:

- a. Form 700 Statement of Economic Interests, and Form 700 Statement of Economic Interests Reference Pamphlet.
 - b. Limitations and Restrictions on Gifts, Honoraria, Travel and Loans: A Fact Sheet for Local Officials.
 - c. Recognizing Conflicts of Interest: A Guide to the Conflict of Interest Rules of the Political Reform Act.
 - d. Leaving Local Government Employment.
 - e. Political Reform Act, including the full text of the law.
 - f. FPPC Regulations, including the full text of the regulations.
 - g. FPPC Letters and Opinions, including a searchable database of letter and opinions issued by the FPPC on ethical issues.
3. Campaign Rules/Finance. <http://www.fppc.ca.gov/learn/campaign-rules.html>.
 4. Advice and Enforcement. The FPPC offers informal and formal advice on ethical issues and has procedures for making a complaint. Instructions for seeking advice or making a complaint are on the FPPC website.

J.L. California Attorney General Conflict of Interest Guide

The California Attorney General has published a Conflict of Interest Guide which contains information on a wide range of conflict of interest issues. Although the Guide was last updated in 2010, it remains a useful reference. The Guide is available online at <https://oag.ca.gov/sites/all/files/agweb/pdfs/publications/coi.pdf>.

K.M. Los Angeles County Registrar-Recorder/County Clerk

Information concerning Los Angeles County campaign rules and finance can be obtained at <https://lavote.net/home/voting-elections/candidate-measure-information/campaign-finance-prop-b-reporting/campaign-disclosure-information>.

L.N. Los Angeles County Fraud Hotline

Ethical concerns may be reported to the Los Angeles County Fraud Hotline, <http://fraud.lacounty.gov/>. The County Fraud Hotline will not generally investigate LACERA issues, but it will forward concerns to LACERA for response.

XVI. Review of Code

This Code shall be reviewed by the Board of Retirement and Board of Investments every three years. The Legal Office and Internal Audit shall monitor applicable laws, regulations, and best practices on an ongoing basis and shall request amendment of the Code when deemed necessary and appropriate. This Code may be amended by action of both Boards at any time.

APPENDIX A – SUMMARY OF GIFT LIMITATIONS AND RESTRICTIONS

WHAT IS A GIFT? A “gift” is any payment or other benefit that confers a personal benefit for which you do not provide payment or services of equal or greater value. Gifts are valued at fair market value as of the time the gift is received. Gifts include price discounts and rebates, unless generally available to the public. Gifts are income reportable on Form 700, Schedule D or E, subject to applicable rules and exceptions, including those below.

Examples of Gift Exceptions (no reporting/no dollar limit/no conflict of interest):

1. Items returned unused to the donor, or for which you reimburse the donor, within 30 days.
2. Items donated unused, within 30 days of receipt, to (a) a 501(c)(3) non-profit with which you do not hold a position, or (b) a government agency. You cannot claim a tax deduction.
3. Gifts from a family member (spouse or former spouse, child, parent, grandparent, grandchild, sibling, current or former parent-in-law, siblings-in-law, aunt, uncle, niece, nephew, or first cousin, or the spouse of any such person), unless the family member is acting for another person.
4. Informational material provided to assist you in performing your official duties, including books, periodicals, videos, admission or discounts to informational conferences, demonstrations, or tours. This exception does NOT apply to meals, lodging, or (generally) transportation.
5. Tickets that you do not use and do not give to another person.
6. Two tickets, used by you and one guest, to attend a fundraiser for a campaign committee or candidate or a 501(c)(3) non-profit, provided the tickets are received from the organizer.
7. Items provided to LACERA and used by you for official business.
8. Travel payments made to LACERA and used to pay for your official business travel.

Examples of Limited Gift Exceptions:

1. Gifts commonly received from a dating partner, long-time personal friend, existing personal or business relationship unrelated to LACERA, or as an act of human compassion (no reporting or dollar limit, but these exceptions do not apply if person has LACERA business).
2. Wedding gifts received (not subject to dollar limit but reportable on Form 700 if meet gift threshold, with ½ of value reportable by each spouse; disqualification applies if donor has LACERA business).
3. Gifts commonly exchanged on holidays, birthdays, or similar occasions to the extent the gifts exchanged are not disproportionate in value.
4. Reciprocal exchanges with another individual (e.g., rotating lunches) so long as payments are not substantially disproportionate, payments are roughly equal over any calendar year, and no single payment is greater than the gift limit.
5. Travel payments for actual transportation, meals, and lodging the day of, day before, and day after you give a speech for a legitimate LACERA business purpose or on a state/national policy issue. Such payments are reportable on Form 700 and subject to conflict of interest disqualification.

GIFT LIMITS

Gifts with a combined total of under \$50 from a single source for the calendar year need not be disclosed. Gifts greater than the gift limit below in any 12-month period may require disqualification.

Board of Retirement and Staff Identified in LACERA Conflict of Interest Code (“Code Filers”):

For ~~2016~~2021-2022, you may not accept gifts from a single source with a combined total of more than ~~\$460~~520 for the calendar year if the Code requires you to report gifts from that source on your Form 700. ~~For 2017-18, the limit increases to \$470.~~

Board of Investments and Staff Identified in Appendix to the Conflict of Interest Code (“87200 Filers”):

For ~~2016~~2021-2022, you may not accept gifts from ANY single source with a combined total of more than ~~\$460~~520 for the calendar year. ~~For 2017-18, the limit increases to \$470.~~

IMPORTANT NOTE: This document is only a summary of applicable law as of ~~December 2016~~September 2021; additional rules apply. Any gift may create the appearance of a conflict of interest. Please contact the LACERA Legal Office with any questions. This summary will be updated as needed.

Attachment B
Clean Copy of Revised
Code of Ethical Conduct

CODE OF ETHICAL CONDUCT

Revised
and Approved:

Board of Retirement: _____
Board of Investments: _____

NOTE: Once the revised Code is finalized by the Boards, the CEO will add his transmittal letter emphasizing the importance of the Code and providing staff with instruction to review and acknowledge the Code. The Board may discuss whether to also have a Board Trustee acknowledgment.

To LACERA Board Trustees and Staff:

Very truly yours,

Santos H. Kreimann
Chief Executive Officer

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APPENDIX A – SUMMARY OF GIFT LIMITATIONS AND RESTRICTIONS

I. Purpose and Scope

The Los Angeles County Employees Retirement Association (LACERA) is a public pension plan organized under the County Employees Retirement Law of 1937 (CERL) (Cal. Gov't Code §§ 31450 et seq.) and the California Public Employees' Pension Reform Act of 2013 (PEPRA) (Cal. Gov't Code §§ 7522 et seq.). The management and administration of LACERA are vested in the Board of Retirement. All investments of LACERA are the responsibility of the Board of Investments.

The Trustees of the LACERA Boards are mindful of the positions of trust and confidence they hold. The Boards adopt this Code of Ethical Conduct to define standards of ethical conduct required of LACERA Board Trustees and staff. The purpose of the Code is to ensure the proper administration of LACERA and to foster public confidence in LACERA's institutional integrity as a well-managed public pension system.

"Ethics" and "ethical conduct" are defined for purposes of this Code as conduct that complies with principles of honesty, integrity, trust, fairness, and duty in connection with LACERA's business as a public pension fund. This Code looks to three sources for determination of ethical standards:

- First, laws and regulations applicable to LACERA and its business, Board Trustees, and staff, including the California Constitution, CERL, the Political Reform Act and the regulations adopted thereunder, the Ralph M. Brown Act, and other statutes, regulations, and case law.
- Second, best practices of ethical conduct. Best practices are drawn from ethical codes and practices of other public pension systems in California and elsewhere, professional associations, and similar sources.
- Third, LACERA's **Mission, Values, and Vision**, historical LACERA practices, and judgment as to the moral principles and behavior that LACERA as an organization strives to follow.

This Code provides ethical standards for LACERA Board Trustees and staff. The Code provides specific guidance for common situations raising ethical issues. However, the Code does not specifically address every issue that Board Trustees and staff will encounter. As to those other situations, the Code should be used and followed as a reference for standards of conduct and the basis for evaluation of facts and circumstances. The Code requires that additional information be requested when a user is unsure as to how the Code should be interpreted or when a user encounters an ethical issue not covered in the Code.

This Code is important:

- To ensure legal compliance with ethics laws and regulations.

- To further best ethical business practices.
- To establish an organization-wide culture and accountability for ethics.
- To foster trust, credibility, and positive relationships between LACERA and all parties necessary for the effective performance of LACERA's **Mission to produce, protect and provide the promised benefits**. These parties include others inside the organization, members, the plan sponsor and other participating employers, vendors, the public, and all others with whom LACERA may deal.
- To further LACERA's **Values** and **Vision**, which incorporate ethics, honesty, integrity, fairness, and trust.
- To establish common ethical standards followed by everyone at LACERA, instead of leaving ethics to unguided and possibly inconsistent personal judgment and interpretation.
- To mitigate the legal and business risks associated with ethical issues.
- To further the organization's business goals and objectives.
- To confirm the process for reporting or raising ethical concerns or questions.
- To identify resources for additional information concerning ethics and the applicable laws and regulations.

The Code shall not be construed as the sole source of ethics laws and regulations which must be observed by LACERA Board Trustees and staff. Nothing in this Code shall exempt any person from any other applicable federal, state, or local law or regulation. The standards of ethical conduct in this Code are in addition to any such other laws and regulations.

II. General Ethical Standards

This Code addresses specific ethical requirements in subsequent sections. The application of those specific requirements is summarized in this Section II as General Ethical Standards.

The following General Ethical Standards apply to LACERA Board Trustees and staff:

- Recognize and be accountable for all fiduciary responsibilities.
- Comply with all applicable laws and regulations, including those listed in Section I and elsewhere in this Code or which may be determined to be applicable in individual circumstances.
- Further the interests of transparency in the conduct of the public's business as described in the Ralph M. Brown Act and Public Records Act.
- Conduct all LACERA business in a fair manner and be honest in all business dealings.
- Strive to provide the highest quality of performance and counsel.
- Avoid any activity which, based on available information and reasonable due diligence and inquiry under the circumstances, constitutes an actual conflict of interest or which could be perceived or interpreted as a conflict of interest by others.
- Avoid exerting improper influence or being improperly influenced, and the appearance of improper influence or being improperly influenced.
- Exercise prudence and integrity in the management of funds.
- Report to an appropriate person actions of themselves or other persons or entities of which they become aware or suspect based on available information and reasonable due diligence and inquiry under the circumstances which may constitute violations of this Code of Ethical Conduct.
- Be responsible for maintaining professional competence.
- Be respectful, professional, and courteous to all LACERA Board Trustees and staff, LACERA members, and all persons and entities with which LACERA does business or may otherwise interact.
- Maintain the confidentiality of all plan member information and all other confidential or privileged information so designated, including but not limited to information provided for or related to closed sessions of the Boards, which is received from or created or maintained by LACERA.

- To the extent not otherwise covered by the preceding bullets, conduct LACERA business in a manner consistent with:
 - LACERA's **Mission** *to produce, protect, and provide the promised benefits.*
 - LACERA's **Values** *of Professionalism, Respect, Open Communications, Fairness, Integrity, and Teamwork.*
 - LACERA's **Vision** *of Excellence, Commitment, Trust, and Service.*
 - All other applicable LACERA policies and procedures.
- Report or seek additional information from an appropriate person, when necessary, concerning ethical questions and issues.

III. Prohibited Transactions

The specific ethical requirements in subsequent sections of the Code define and describe certain prohibited conduct. Those prohibitions are summarized in this Section III as Prohibited Transactions.

LACERA Board Trustees and staff shall not engage in the following Prohibited Transactions:

- Utilizing or permitting others to use any property, resources, information, or opportunity of LACERA for personal gain.
- Engaging in any activity or failing to disclose any activity which, based on available information and reasonable due diligence and inquiry under the circumstances, constitutes an actual conflict of interest or which could be perceived or interpreted by others as a conflict of interest in the impartial and objective execution of duty to LACERA and its members.
- Falsifying or failing to record proper entries on any books or records of LACERA.
- Engaging in serial meetings or other conduct in violation of the Ralph M. Brown Act.
- Knowingly becoming a party to, or condoning, any illegal activity, including failing to report the misconduct under this Code of themselves or other persons or entities.
- Authorizing payment of any amount on behalf of LACERA, or for any purpose, other than that explicitly disclosed in the original request for payment.
- Directly or indirectly seeking or accepting gifts, money, property, or other benefit that would influence or appear to influence the conduct of duties.
- Selling or providing goods or services to LACERA without disclosure.
- Utilizing the services of relatives or close personal associates for LACERA business without disclosing such relationship prior to execution and obtaining the appropriate approval.
- Engaging in activities involving dishonesty, fraud, deceit or misrepresentation.
- Engaging in outside employment with any providers of supplies or services to LACERA.
- Engaging in outside employment that would interfere with or hamper expected performance at LACERA.

- Engaging in other activities which compromise or appear to compromise one's objectivity in the conduct of one's duties.
- Releasing to any third person plan member information or other confidential or privileged information so designated, including but not limited to member information and information provided for or related to closed sessions of the Boards protected by the Ralph M. Brown Act, which is received from or created or maintained by LACERA.
- Engaging in any other conduct prohibited by this Code of Ethical Conduct, Board or LACERA policy, or applicable laws and regulations.

IV. Fiduciary Duties

Trustees of LACERA's Board of Retirement and Board of Investments have fiduciary duties under the California Constitution and other law. LACERA as an organization also has fiduciary duties, which are implemented through LACERA's employees. Finally, certain of LACERA's vendors have a fiduciary duty to LACERA. This Section IV addresses all three categories of fiduciary duty. Board Trustees and staff shall report actions of which they become aware or suspect based on available information and reasonable due diligence and inquiry under the circumstances that may constitute a breach of fiduciary duty by any person or entity known to have such a duty.

A. Fiduciary Duties of Board Trustees

The California Constitution, Article XVI, Section 17, defines the fiduciary duties of the LACERA Boards, and the Board Trustees:

- The Boards "shall have plenary authority and fiduciary responsibility for investment of moneys and administration of the system."
- The Boards "shall have the sole and exclusive fiduciary responsibility over the assets of the system. The retirement board also has sole and exclusive responsibility to administer the system in a manner that will assure prompt delivery of benefits and related services to the participants and their beneficiaries. The assets of a public pension or retirement system are trust funds and shall be held for the exclusive purposes of providing benefits to participants in the pension or retirement system and their beneficiaries and defraying reasonable expenses of administering the system."
- The Trustees of the LACERA Boards "shall discharge their duties solely in the interest of, and for the exclusive purposes of providing benefits to, participants and their beneficiaries, minimizing employer contributions thereto, and defraying reasonable expenses of administering the system. A retirement board's duty to its participants and their beneficiaries shall take precedence over any other duty."
- The member of the LACERA Boards "shall discharge their duties with the care, skill, prudence, and diligence under the prevailing circumstances that a prudent person acting in a like capacity and familiar with these matters would use in the conduct of an enterprise with a like character and like aims."
- As to the Board of Investments, the Trustees "shall diversify the investments of the system so as to minimize the risk of loss and to maximize the rate of return, unless under the circumstances it is clearly not prudent to do so."

These duties are also included in Section 31595 of CERL.

California case law provides that the Boards and the Board Trustees have a trust relationship with LACERA's members and beneficiaries. This trust relationship means

that the Boards and the Board Trustees have a fiduciary duty of prudence and loyalty to members and beneficiaries, which must be exercised in good faith. Further, the Boards and the Board Trustees have a duty to deal fairly with the members and beneficiaries, without the slightest misrepresentation, concealment, threat, or adverse pressure. *Hittle v. Santa Barbara County Employees Retirement Assn.* (1985) 39 Cal.3d 374.

To perform their fiduciary duties, each member of the LACERA Boards shall diligently attend to the business of the Board on which he or she serves and shall not leave to the other Trustees control over the administration of the affairs of such Board.

B. Fiduciary Duties of LACERA, and Staff's Role

LACERA as an organization has the same fiduciary duties. LACERA staff supports the organization, the LACERA Boards, and Board Trustees in the fulfillment of their fiduciary duties as described in Section IV(A) of this Code. Accordingly, LACERA staff shall be familiar with the fiduciary duties described in Section IV(A) and conduct themselves at all times in a manner consistent with those duties. LACERA staff shall take no action inconsistent with those duties. LACERA staff shall avoid any conduct which is, or may be perceived to be, detrimental to LACERA and its members and beneficiaries. In dealing with members, LACERA staff shall be honest and forthright. Staff shall ensure that the information provided to members in connection with their rights, questions, choices and decisions, concerns, and issues is complete and accurate.

C. Fiduciary Duties of Certain Vendors

Certain LACERA vendors have a fiduciary duty to the organization under applicable law or under the terms of a contract with LACERA. LACERA shall monitor those vendors that owe a fiduciary duty to ensure that the vendors comply with that duty. Staff shall ensure that the contract of any vendor with a fiduciary duty includes a provision confirming that duty.

V. Conflicts of Interest

LACERA Board Trustees and staff shall avoid conflicts of interest, including the appearance of conflicts of interest, in all aspects of their work for LACERA and shall comply with applicable laws and regulations relating to conflicts.

A. Form 700 Statement of Economic Interests

Public officials, including LACERA Board Trustees and certain staff, who make or influence governmental decisions are required to submit Form 700 Statements of Economic Interests. Form 700s are an important tool in the identification of actual or potential conflicts of interest by LACERA Board Trustees and staff. Form 700s are public documents. LACERA Board Trustees and designated staff, as generally described below, shall file Form 700s when and as required by applicable law and regulations, which are generally summarized here. Additional information can be obtained from LACERA's Legal Office and from Fair Political Practices Commission publications.

Pursuant to California's Political Reform Act, LACERA's Boards have adopted, and the County of Los Angeles Board of Supervisors has approved as code reviewing authority, a Conflict of Interest Code that requires the filing of a Form 700 by positions "which involve the making or participation in the making of decisions which may foreseeably have a material effect on any financial interest," except positions which manage public investments. Cal. Gov't Code § 87302(a). Persons, including Trustees of the Board of Retirement and identified staff, who file under an agency-adopted Conflict of Interest Code are referred to as "Code Filers." LACERA's Conflict of Interest Code sets forth the positions of all Code Filers and describes the specific economic interest Disclosure Categories that apply to each position.

There is also a separate Conflict of Interest Code for staff who serve as officers or hold other positions in LACERA's wholly-owned title holding entities.

The LACERA and title holding entity Conflict of Interest Codes are subject to biennial review.

Separate provisions of the Political Reform Act require positions managing public investments to file a Form 700. Cal. Gov't Code § 87200. Persons who file under Section 87200, including Trustees of the Board of Investments, the Los Angeles County Treasurer and Tax Collector as an ex officio member of both Boards, and identified staff, are referred to as "87200 Filers." 87200 Filers are required to disclose investments, interests in real property, income (including gifts, loans, and travel payments), and business positions as described in Form 700 and the Political Reform Act. While 87200 Filers are not subject to LACERA's Conflict of Interest Codes, they are listed as a matter of information in the Appendix to LACERA's Code.

Form 700s shall be filed, both by Code Filers and 87200 Filers, upon assuming an applicable position, annually thereafter, and on leaving an applicable position. Certain

Board Trustees and staff are Code Filers and 87200 Filers in different capacities and may complete a combined Form 700. Form 700s shall be filled out by all required filers in a timely, accurate, and thorough and complete manner.

B. Gifts, Honoraria, Travel & Loans

The Political Reform Act, and Regulations promulgated thereunder by the Fair Political Practices Commission (FPPC), impose limitations on gifts, honoraria, travel, and loans. The legal rules associated with gifts, honoraria, travel, and loans are lengthy and detailed. Additional information can be obtained from LACERA's Legal Office and from FPPC publications. A summary of the general standards with respect to these matters is as follows:

Gifts. LACERA Board of Retirement Trustees and staff who are Code Filers are prohibited from receiving gifts totaling more than the legally established gift limit from any single source in a calendar year if receipts of gifts from that source are required to be disclosed on Form 700 by LACERA's Conflict of Interest Code. LACERA Board of Investments Trustees and staff who are 87200 Filers may not accept gifts totaling more than the legally established limit from any single source in a calendar year. Even if a gift is not subject to Form 700 reporting or the gift limit, a gift may still create a conflict of interest; therefore, LACERA requires Board Trustees and all staff shall make disclosure to the Legal Office of all gifts from a single source with a combined total equal to or greater than \$50 in a calendar year from any individual or entity. Gifts to family members are included in the gift rules under certain circumstances. There are also exceptions to the gift rules for certain gifts; questions should be addressed to LACERA's Legal Office or the FPPC. The gift limit is adjusted biennially. The gift limit for 2021-2022 is \$520; the limit for any date after December 31, 2022 should be confirmed with the LACERA Legal Office or the FPPC. Gifts from a single source with a combined total less than \$50 in a calendar year currently are not reportable under FPPC law and regulations; gifts equal to or in excess of this limit are subject to reporting on Form 700, subject to the requirements and limitations described above. A more detailed SUMMARY OF GIFT LIMITATIONS AND RESTRICTIONS is attached as Appendix A.

Honoraria. LACERA Board of Retirement Trustees and staff who are Code Filers are prohibited from receiving honoraria from any source in consideration for any speech, article published, or attendance at any public or private conference, convention, meeting, social event, meal, or like fathering, if receipts of gifts from that source are required to be disclosed on Form 700 by LACERA's Conflict of Interest Code. LACERA Board of Investments Trustees and staff who are 87200 Filers may not accept any honoraria payments. There are certain exceptions to the honoraria rules; questions should be addressed to LACERA's Legal Office or the FPPC. Even if an honorarium is not subject to disclosure, Board Trustees and staff shall make disclosure to the Legal Office of such a payment from any individual or entity as to which LACERA will take any action.

Honoraria include money, advances, reimbursements, and gifts of any other type that have more than nominal value.

Travel. Payments or reimbursement for travel are subject to the reporting requirements for gifts and income. If a travel payment is a gift, it is subject to the gift limit. A travel payment can also be considered an honorarium. Recusal may be required from any decision that will have a materially foreseeable financial effect on the source of a travel payment. There are exceptions to the travel rules; additional information can be obtained from LACERA's Legal Office or the FPPC.

Loans. 87200 Filers and elected Trustees of the Boards may not receive a personal loan that exceeds \$250 at any given time from an officer, employee, member, or consultant of LACERA or from any individual or entity that has a contract with LACERA. Ordinary retail loans and credit card transactions are excepted if they are offered on the same terms as generally available to the public. Elected Trustees of the Boards may not receive a loan of \$500 or more unless the loan is made in writing and clearly states the terms. There are other limitations and exceptions. A loan can constitute a gift under certain circumstances. Additional information is available from LACERA's Legal Office or the FPPC.

Board Trustees and staff are prohibited from soliciting any gift or any other consideration (including but not limited to money, service, gratuity, favor, entertainment, hospitality, loan, or other thing of value) from anyone who is doing or is seeking to do business of any kind with LACERA.

Board Trustees and staff are prohibited from accepting any gift from anyone who is doing or is seeking to do business of any kind with LACERA, when the gift is offered with a view toward securing favorable treatment in the awarding of any contract or agreement, or the making of any determination.

All rules relating to gifts, honoraria, travel, and loans are subject to change by the FPPC and other authority. Confirmation of the current rules can be obtained from LACERA's Legal Office or the FPPC.

C. Incompatible Activities/Incompatible Offices

LACERA Board Trustees and staff shall not engage in any employment, activity, or enterprise which is inconsistent, incompatible, in conflict with, or inimical to his or her duties for or on behalf of LACERA, or with the duties, functions, or responsibilities of the position he or she occupies for LACERA. LACERA Board Trustees and staff shall not perform any work, service, or counsel outside his or her responsibilities for LACERA where any part of his or her efforts will be subject to approval by the Boards or any employee of LACERA acting in that capacity. Cal. Gov't Code § 1126.

Board Trustees may not simultaneously hold two public offices where the functions of

the offices are inconsistent or where there are conflicting interests. Cal. Gov't Code § 1199. The Los Angeles County Treasurer and Tax Collector holds that position as well as, under CERL, positions as a member of both the Board of Retirement and Board of Investments; these are not incompatible offices.

D. Contracts

LACERA Board Trustees and staff shall not be financially interested, directly or indirectly, in any contract made between LACERA and any individual or entity. The making of a contract includes any participation whatsoever, including the development of the need for the goods or services subject to the contract, issuance of a Request for Proposals (RFP), Request for Information (RFI), purchase order, or other solicitation or contracting process, evaluation of prospective contracting parties, selection of contracting parties, negotiation of the terms of the contract, and performance of the contract. Cal. Gov't Code § 1090 et seq.

E. Investments

LACERA Board Trustees and staff shall not have any personal interest, direct or indirect, in the making of any investment by LACERA, or in the gains or profits from any investment. Board Trustees and staff shall not, directly or indirectly, for themselves, or as an agent or partner of others, sell or provide any investment product to LACERA. Cal Gov't Code § 31528 (a), (b).

F. Disclosure and Recusal

LACERA Board Trustees and staff shall disclose actual or potential conflict of interest, based on available information and reasonable due diligence and inquiry under the circumstances, or the appearance of an actual or potential conflict of interest, to the Chief Executive Officer and the Legal Office. Board Trustees and staff shall recuse themselves from involvement, consideration, and decision of a matter as to which the member has an actual conflict of interest. Recusal, or disqualification, is mandatory in certain circumstances, and discretionary in others. Board Trustees and staff should consider recusing themselves from consideration and decision of a matter as to which the member has a potential conflict of interest, or the appearance of an actual or potential conflict of interest. Board Trustees and staff shall consult with the Legal Office on any issue of recusal to discuss legal requirements that may apply to the particular circumstances, including whether recusal is required, whether recusal is an effective remedy for a conflict or potential conflict or whether other steps (up to and including disqualification of an individual or the Board) are necessary, and the way in which recusal, if possible, should be documented.

G. Conflicts of Interest by Vendors

LACERA's contracts shall include appropriate provisions to ensure that there are no conflicts of interest during the contracting process and to prevent conflicts of interest during the term of a contract. Board Trustees and staff should be alert to, and take

other appropriate steps to prevent, actual or potential conflicts of interest of which they are aware or suspect based on available information and reasonable due diligence and inquiry under the circumstances by vendors in connection with the making or performance of contracts.

VI. Employment of Related and Unrelated Persons

To avoid nepotism or the appearance of nepotism, including the potential conflicts of interest and appearance of unfairness that may result, LACERA may not employ a person who is related to:

- A Board Trustee.
- The Chief Executive Officer.
- Persons serving as Deputy Chief Executive Officer, an Assistant Executive Officer, and any other employee reporting directly to the Chief Executive Officer.
- A division manager.

This prohibition does not prevent the continued employment of a person who has already been working for LACERA in a full time and non-probationary capacity for thirty consecutive days prior to the date the Board Trustee or other individual described above acquired their position, or the related party became related. If a related party is retained under these circumstances, any actual or potential conflict of interest must still be corrected or sufficiently mitigated.

Related parties of other LACERA staff may be considered for employment by LACERA provided the applicant possesses all the qualifications for employment and that no preferential or unfair treatment is given based on any relationship. Such a related party may not be hired for or assigned to a position which would either:

1. Create either a direct or indirect supervisor/subordinate relationship with a related party; or
2. Create either an actual conflict of interest or the appearance of a conflict of interest.

These criteria will also be considered when assigning, transferring, or promoting a staff member.

For purposes of this policy, “related parties” include:

- Spouse, parent or grandparent, child or grandchild, or sibling.
- First degree aunt, uncle, niece, nephew or cousin.
- Any “step” or “in-law” variant of the aforementioned relationships.
- Any member of the employee’s household, whether or not related.

A LACERA Board Trustee or staff may not exercise individual discretionary authority to hire, evaluate or promote a related party under any circumstances, even when

otherwise permitted under the standards above.

Board Trustees and staff may participate in the hiring process for any person, whether related or unrelated, only in accordance with established LACERA policies and procedures and shall not use or attempt to use influence outside of their individual hiring authority to cause the organization to hire any individual as a permanent or temporary LACERA employee. Board Trustees and staff may refer individuals interested in potential employment to LACERA's Human Resources.

VII. Contracting and Vendor Relationships

LACERA Board Trustees and staff shall not have contact with individuals or entities who are or should be reasonably known, based on available information and reasonable due diligence and inquiry under the circumstances, are seeking engagement by LACERA in response to an RFP, RFI, purchase order, or other solicitation or contracting process, except in accordance with the published terms of the contracting process or except for, and limited to, contact necessary in connection with ongoing LACERA business with an individual or entity.

LACERA's RFPs, RFIs, and other contract solicitations shall include notice that a "quiet period" will be in place from the beginning of the contracting process until the selection of the successful party such that LACERA Board Trustees and staff, as well as potential contracting parties, are instructed that contact between Board Trustees and staff, on the one hand, and all potential contracting parties, on the other hand, shall not occur, except as provided in the preceding paragraph. As part of the contracting process, potential contracting parties shall be required to disclose potential conflicts of interest. LACERA staff shall provide quiet period lists to Board Trustees and staff in monthly Board of Retirement and Board of Investments meeting packets to assist in compliance.

LACERA Board Trustees and staff shall participate in the contracting process only in accordance with established LACERA policies and procedures, and the published terms of the process. Board Trustees and staff shall not use or attempt to use influence, outside of their individual authority to cause the organization to enter into a contract with any individual or entity. Board Trustees and staff may refer individuals or entities for consideration for contracting to the appropriate LACERA staff responsible for the particular procurement or contract process.

VIII. Use of LACERA Position, Resources, and Information

LACERA Board Trustees and staff shall not use their position or status with LACERA, LACERA property, funds, or other resources, or LACERA information, including plan member information, investment information, and other information concerning LACERA's business, for any personal purpose or gain, to secure any special privilege or exemption for themselves or any other individual or entity, or to assist or further the interests of any other individual or entity except in the normal course of LACERA's business. LACERA position, resources and information are to be exclusively used for LACERA business.

Board Trustees and staff shall maintain the confidentiality of plan member information. Cal. Gov't Code § 31532.

Disclosures of public LACERA information pursuant to the Public Records Act shall be handled by the Legal Office to ensure compliance with legal requirements, consistency, and proper recordkeeping.

Board Trustees and staff shall not disclose information acquired during a closed session of the Board unless the Board takes action to authorize disclosure. Cal. Gov't Code § 54963.

Board Trustees and staff shall not, directly or indirectly, for themselves, or as an agent or partner of others, borrow or use any of the funds or deposits of LACERA, except to make authorized current and necessary payments of the retirement system. Cal. Gov't Code § 31528(a).

IX. Personal Conduct and Communication

LACERA Board Trustees and staff shall adhere to the following standards in their personal conduct in performing their work on behalf of LACERA:

- Board Trustees and staff shall conduct themselves in accordance with this Code of Ethical Conduct.
- Board Trustees and staff shall abide all applicable laws and regulations.
- Board Trustees and staff shall act in a manner consistent with LACERA's **Mission, Values, and Vision** and shall follow all LACERA policies and procedures.
- Board Trustees and staff shall treat similarly situated individuals and entities in a similar way, absent good cause, in the conduct of LACERA's business and decision-making to ensure consistency and fairness.
- Board Trustees and staff shall communicate with, orally and in writing, and otherwise in all respects and at all times treat each other and all others in a respectful, professional, courteous, and civil manner.

A Board Trustee shall not correspond with a non-LACERA person or entity using LACERA letterhead unless the communication is authorized by the Board on which the member serves. Copies of all written communications from a Board Trustee to a current service provider, or person or entity related to a current service provider, relating to LACERA's business (other than purely personal or social correspondence) shall be provided to the Chief Executive Officer for subsequent distribution to all Trustees of the Board on which the Trustee serves. A copy of any written communication (other than purely personal or social correspondence, routine announcements, generally distributed newsletters, and the like) received by a Board Trustee from a current LACERA service provider, or person or entity related to a current service provider, shall be forwarded to the Chief Executive Officer for subsequent distribution to all Trustees of the Board on which the Trustee serves. For purposes of this paragraph, the terms "communication" and "written communication" include email and other forms of electronic communication as well as physical or hard copy forms of communication.

Board Trustees and staff shall be aware of the risk of communicating inaccurate information to plan members. Board Trustees and staff shall refrain from providing specific advice or counsel with respect to a plan member's rights, benefits, or obligations, except staff who are authorized to communicate with members on such matters. All others should refer plan member questions and concerns to the Chief Executive Officer or appropriate designee.

X. Political Activities

LACERA Board Trustees and staff may work on individual candidate and ballot campaigns, and attend campaign events, during their personal time. They may make campaign contributions using personal funds, subject to applicable campaign finance laws. No LACERA funds, property, technology, letterhead, logo, or other resources may be used by LACERA Board Trustees and staff to support personal political activities. LACERA Board Trustees and staff may not solicit political contributions to a candidate or ballot campaign from other Board Trustees and staff except (1) as part of a solicitation that is made to a significant segment of the public or (2) with respect to a ballot measure which would affect the rate of pay, hours of work, retirement, civil service, or other working conditions of LACERA employees; solicitations permitted by these two exceptions may only be made on personal time. LACERA Board Trustees and staff may not use their influence or make any threats or promises relating to potential or current employment, promotion, or compensation to secure a vote or financial or other support for a candidate or ballot campaign. Cal. Gov't Code §§ 3201 et seq. LACERA Board Trustees and staff may use their LACERA position to identify themselves when making an endorsement, provided that no statement may be made or action taken directly or indirectly indicating that the person represents LACERA in making the endorsement or that the endorsement is supported by or represents the position of LACERA, except when providing information authorized by the Boards. Nothing in this section is intended to impose any limitation on the personal political activities of LACERA Board Trustees and staff not permitted by California law.

XI. Leaving LACERA

A. Prospective Employment

LACERA Board Trustees and all staff shall not make, participate in making, or influence a decision by LACERA that directly relates to a nongovernmental prospective employer while negotiating or after reaching an employment agreement. The foregoing prohibition is triggered by an interview with a nongovernmental prospective employer or a nongovernmental prospective employer's agent, discussing an offer of employment with a nongovernmental prospective employer or a nongovernmental prospective employer's agent, or accepting an offer of employment. The foregoing prohibition does not apply if the Board Trustee or staff is legally required to make or participate in the making of the decision or if the decision affects the nongovernmental prospective employer in substantially the same way as it will affect a significant segment of the public generally. Cal. Gov't Code § 87407.

B. Limitations on Subsequent Activities

LACERA Board Trustees, the Chief Executive Officer, Deputy Chief Executive Officer, Assistant Executive Officers, persons next in line to Assistant Executive Officers, Chief Counsel, chief deputy legal officers, the Chief Investment Officer, and persons next in line to the Chief Investment Officer shall not, for two years after leaving that position, for compensation, act as agent or attorney for, or otherwise represent, any person except the County of Los Angeles, by making any formal or informal appearance before, or any oral or written communication to, LACERA, or any Board Trustee or employee of LACERA, for the purpose of influencing action by LACERA, including any action involving the awarding or issuance of a contract or sale or purchase of goods or property. Cal. Gov't Code § 31528(c).

In addition, under Government Code Section 87406.3, elected Trustees and the CEO shall not, for a period of one year after leaving that office or employment, act as agent or attorney for, or otherwise represent, for compensation, any other person, by making any formal or informal appearance before, or by making any oral or written communication to, LACERA, the Boards, or any committee of the Boards, or any LACERA officer or employee if the appearance or communication is made for the purpose of influencing action by LACERA involving the issuance, amendment, awarding, or revocation of a contract or the sale or purchase of goods or property.

XII. Reporting

Reporting of ethical issues with respect to their own conduct or the conduct of others of which they become aware or suspect based on available information and reasonable due diligence and inquiry under the circumstances is an important element of ensuring compliance with ethical requirements. Any such concerns by Board Trustees and staff about possible violations of this Code of Ethical Conduct or other ethical issues by themselves or others shall be reported to the Chief Executive Officer, the Chief Audit Executive, or Chief Counsel. Board Trustees may also report concerns to their Board Chair. Staff may also report ethical issues to their immediate supervisor or division manager.

Concerns may be reported anonymously at the LACERA Ethics Hotline, which may be reached by telephone at (844) 794-9416 or online at lacera.ethicspoint.com.

XIII. Enforcement

LACERA's Chief Executive Officer is responsible for communicating, implementing and enforcing the Code of Ethical Conduct with respect to LACERA staff. The Board Chairs will enforce this Code with respect to Board Trustees and the Chief Executive Officer in accordance with Board administrative policies and applicable laws.

Violations of any of the provisions of the Code by staff may result in disciplinary action as the situation may warrant, up to and including termination of employment. Violations by Board Trustees will be handled in accordance with Board Regulations, Bylaws, and policies and applicable law.

With respect to the Los Angeles County Treasurer and Tax Collector, application of this Code shall take into account their responsibilities in that position and Los Angeles County policies applicable to the position, while recognizing that the Treasurer and Tax Collector has separate and independent fiduciary duties and legal obligations to LACERA and its members as described in this Code.

Questions on this matter should be referred to LACERA's Director of Human Resources, Internal Audit, or the Legal Office.

XIV. Training

LACERA management will provide training to new staff on this Code of Ethical Conduct as part of the new employee orientation. Management will provide training to existing staff on this Code at least every two years.

Management will include discussion of this Code in the training for new and incoming Board Trustees. The Code will be circulated to all Board Trustees at least every two years.

XV. Resources

Board Trustees and staff may refer to the following resources for additional information concerning this Code, questions concerning the application and interpretation of the Code to specific situations, and other issues concerning ethics and ethical conduct relevant to the performance of their duties and work for LACERA and its members and beneficiaries.

A. LACERA's Legal Office

The LACERA Legal Office is familiar with the laws and regulations that form the foundation for this Code. The Legal Office is experienced in applying those laws and regulations to specific situations. The Legal Office is available at any time to provide additional information concerning ethics questions and issues and provide written or oral advice or opinions with respect to specific situations. The Legal Office will respond to information about potential ethical issues, concerns, and violations in the LACERA organization and take appropriate action. Questions for the Legal Office should be directed to LACERA's Chief Counsel.

B. LACERA's Internal Audit Division/Ethics Hotline

LACERA's Internal Audit Division will respond to information concerning ethical issues, problems, and concerns regarding acts or omissions in connection with LACERA's operations and will take appropriate action. Questions for the Internal Audit Division should be directed to LACERA's Chief Audit Executive. The Internal Audit Division may also be contacted anonymously on the LACERA Ethics Hotline, which may be reached by telephone at (844) 794-9416 or online at lacera.ethicspoint.com.

C. LACERA's Conflict of Interest Code

Board Trustees and staff should refer to LACERA's current Conflict of Interest Code, which is available on LACERA's website, www.lacera.com, with respect to LACERA's requirements for the filing of Form 700 Statements of Economic Interests.

D. California Constitution

The California Constitution, Article XVI, Section 17, which sets forth the fiduciary duties of the Board and Board Trustees and the retirement system, is available online at https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=CONS§ionNum=SEC.%2017.&article=XVI.

E. CERL

CERL, California Government Code §§ 31450 et seq., is available online at https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=GOV&division=4.&title=3.&part=3.&chapter=3.&article=.

F. PEPRA

PEPRA, California Government Code §§ 7522 et seq., is available online at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=7.&title=1.&part=&chapter=21.&article=4.

G. California Government Code Section 1090 et seq.

Conflict of interest rules relating to financial interest in the making of contracts, incompatible activities, and incompatible offices are contained in California Government Code Section 1090 et seq., which is available online at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=4.&title=1.&part=&chapter=1.&article=4.

H. California Government Code Section 3201 et seq.

Rules regarding political activities are contained in California Government Code Section 3201 et seq., which is available online at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=4.&title=1.&part=&chapter=9.5.&article=.

I. The Brown Act

The Brown Act may be found online at https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=2.&chapter=9.&part=1.&lawCode=GOV&title=5.

J. Other California Statutes

Other California statutes relating to ethics issues are available online at <https://leginfo.legislature.ca.gov/faces/codes.xhtml>.

K. Fair Political Practices Commission

The California Fair Political Practices Commission (FPPC) has a large number of resources available concerning ethics issues under the Political Reform Act, FPPC Regulations, and related law. FPPC resources include:

1. Website: www.fppc.ca.gov/.
2. FPPC Publications available on the website:
 - a. Form 700 Statement of Economic Interests, and Form 700 Statement of Economic Interests Reference Pamphlet.
 - b. Limitations and Restrictions on Gifts, Honoraria, Travel and Loans: A Fact Sheet for Local Officials.

- c. Recognizing Conflicts of Interest: A Guide to the Conflict of Interest Rules of the Political Reform Act.
 - d. Leaving Local Government Employment.
 - e. Political Reform Act, including the full text of the law.
 - f. FPPC Regulations, including the full text of the regulations.
 - g. FPPC Letters and Opinions, including a searchable database of letter and opinions issued by the FPPC on ethical issues.
3. Campaign Rules/Finance. <http://www.fppc.ca.gov/learn/campaign-rules.html>.
 4. Advice and Enforcement. The FPPC offers informal and formal advice on ethical issues and has procedures for making a complaint. Instructions for seeking advice or making a complaint are on the FPPC website.

L. California Attorney General Conflict of Interest Guide

The California Attorney General has published a Conflict of Interest Guide which contains information on a wide range of conflict of interest issues. Although the Guide was last updated in 2010, it remains a useful reference. The Guide is available online at <https://oag.ca.gov/sites/all/files/agweb/pdfs/publications/coi.pdf>.

M. Los Angeles County Registrar-Recorder/County Clerk

Information concerning Los Angeles County campaign rules and finance can be obtained at <https://lavote.net/home/voting-elections/candidate-measure-information/campaign-finance-prop-b-reporting/campaign-disclosure-information>.

N. Los Angeles County Fraud Hotline

Ethical concerns may be reported to the Los Angeles County Fraud Hotline, <http://fraud.lacounty.gov/>. The County Fraud Hotline will not generally investigate LACERA issues, but it will forward concerns to LACERA for response.

XVI. Review of Code

This Code shall be reviewed by the Board of Retirement and Board of Investments every three years. The Legal Office and Internal Audit shall monitor applicable laws, regulations, and best practices on an ongoing basis and shall request amendment of the Code when deemed necessary and appropriate. This Code may be amended by action of both Boards at any time.

APPENDIX A – SUMMARY OF GIFT LIMITATIONS AND RESTRICTIONS

WHAT IS A GIFT? A “gift” is any payment or other benefit that confers a personal benefit for which you do not provide payment or services of equal or greater value. Gifts are valued at fair market value as of the time the gift is received. Gifts include price discounts and rebates, unless generally available to the public. Gifts are income reportable on Form 700, Schedule D or E, subject to applicable rules and exceptions, including those below.

Examples of Gift Exceptions (no reporting/no dollar limit/no conflict of interest):

1. Items returned unused to the donor, or for which you reimburse the donor, within 30 days.
2. Items donated unused, within 30 days of receipt, to (a) a 501(c)(3) non-profit with which you do not hold a position, or (b) a government agency. You cannot claim a tax deduction.
3. Gifts from a family member (spouse or former spouse, child, parent, grandparent, grandchild, sibling, current or former parent-in-law, siblings-in-law, aunt, uncle, niece, nephew, or first cousin, or the spouse of any such person), unless the family member is acting for another person.
4. Informational material provided to assist you in performing your official duties, including books, periodicals, videos, admission or discounts to informational conferences, demonstrations, or tours. This exception does NOT apply to meals, lodging, or (generally) transportation.
5. Tickets that you do not use and do not give to another person.
6. Two tickets, used by you and one guest, to attend a fundraiser for a campaign committee or candidate or a 501(c)(3) non-profit, provided the tickets are received from the organizer.
7. Items provided to LACERA and used by you for official business.
8. Travel payments made to LACERA and used to pay for your official business travel.

Examples of Limited Gift Exceptions:

1. Gifts commonly received from a dating partner, long-time personal friend, existing personal or business relationship unrelated to LACERA, or as an act of human compassion (no reporting or dollar limit, but these exceptions do not apply if person has LACERA business).
2. Wedding gifts received (not subject to dollar limit but reportable on Form 700 if meet gift threshold, with ½ of value reportable by each spouse; disqualification applies if donor has LACERA business).
3. Gifts commonly exchanged on holidays, birthdays, or similar occasions to the extent the gifts exchanged are not disproportionate in value.
4. Reciprocal exchanges with another individual (e.g., rotating lunches) so long as payments are not substantially disproportionate, payments are roughly equal over any calendar year, and no single payment is greater than the gift limit.
5. Travel payments for actual transportation, meals, and lodging the day of, day before, and day after you give a speech for a legitimate LACERA business purpose or on a state/national policy issue. Such payments are reportable on Form 700 and subject to conflict of interest disqualification.

GIFT LIMITS

Gifts with a combined total of under \$50 from a single source for the calendar year need not be disclosed. Gifts greater than the gift limit below in any 12-month period may require disqualification.

Board of Retirement and Staff Identified in LACERA Conflict of Interest Code (“Code Filers”):

For 2021-2022, you may not accept gifts from a single source with a combined total of more than \$520 for the calendar year if the Code requires you to report gifts from that source on your Form 700.

Board of Investments and Staff Identified in Appendix to the Conflict of Interest Code (“87200 Filers”):

For 2021-2022, you may not accept gifts from ANY single source with a combined total of more than \$520 for the calendar year.

IMPORTANT NOTE: *This document is only a summary of applicable law as of September 2021; additional rules apply. Any gift may create the appearance of a conflict of interest. Please contact the LACERA Legal Office with any questions. This summary will be updated as needed.*

October 22, 2021

TO: Each Trustee,
Board of Retirement
Board of Investments

FROM: Joint Organizational Governance Committee
Shawn R. Kehoe, Chair
Elizabeth Greenwood, Vice Chair
Alan J. Bernstein
Vivian H. Gray
Joseph Kelly
Keith Knox
Les Robbins
Herman B. Santos

FOR: November 3, 2021 Board of Retirement Meeting
November 17, 2021 Board of Investments Meeting

SUBJECT: Revised Media Policy

Recommendation

That the Board of Retirement and Board of Investments approve the revised Media Policy.

Legal Authority

Under Article XVI, Section 17 of the California Constitution, the Board of Retirement and Board of Investments have plenary authority and exclusive fiduciary responsibility for, respectively, the administration of the system and investment of system assets, which includes administrative policies such as the Media Policy. Under Section 7.4 of its Charter, the JOGC makes this recommendation under its authority with respect to joint policies.

Background

At its July 21, 2021 and September 17, 2021 meetings, the JOGC reviewed the Media Policy. The JOGC noted that the Policy has in the past been an Executive Office policy and was not approved by the Boards. On September 17, the JOGC voted to recommend to the Boards the revised Media Policy, which includes changes from that current Policy as shown in the redlined version attached as Attachment A. A clean copy is attached as Attachment B.

Attachment A
Revised Redlined Media Policy



MEDIA POLICY

PURPOSE:

The purpose of creating a formal LACERA media policy is to ensure that the policies and actions of LACERA and the Boards of Retirement and Investments are accurately transmitted and explained to legitimate representatives of the mass media. The same policy will serve as a guide for communications with all outside parties, including the Board of Supervisors, Chief ~~Administrative-Executive~~ Officer, County departments, employee organizations, and other industry groups.

Information subject to legal protection, including under the Brown Act, the Public Records Act, and other legal privileges, may not be disclosed.

LACERA STAFF:

The general spokesperson for LACERA is the Chief Executive Officer (CEO), or designee. The CEO is authorized to respond to legitimate inquiries by relaying any policy and action officially adopted by LACERA or the Board(s). This includes making available any documents which have been presented to the Board(s) and are therefore matters of public record or which are otherwise organizational records subject to disclosure under the Public Records Act.

Neither the CEO, nor any other LACERA employee, is authorized to speculate as to the intent or motivations of a Board Trustee or staff member. Personal opinions are to be avoided whenever possible. When a personal opinion is provided, discretion is to be utilized and the opinion is to be so identified to the inquiring party.

On Board of Investments policies and practices, the Chief Investment Officer (CIO), or designee, is the primary spokesperson. The CIO's discretion and restrictions are the same as those mentioned above.

The CEO Assistant Executive Officer (AEO), or designee, which may include the Deputy Chief Executive Officer (DCEO) and the Assistant Executive Officers (AEOs), is the primary spokesperson for Board of Retirement policies and practices and general administrative and benefits issues. The same discretionary authority and restrictions as those mentioned above apply to the AEO designees.

On occasion, the CEO, or CIO ~~or AEO~~ may designate a particular staff member as the sole and exclusive contact for a particular issue. Such designations will be made only to senior staff members who are technically proficient with respect to the subject of the designation and who possess the maturity and discretion to can effectively deal with media representatives. The CEO and CIO, and designees, in their discretion may use LACERA's engaged public relations and media consultant, under the terms of their contract, to assist in communicating with the media and other outside parties.

As a general rule, LACERA staff members will not initiate any mass media contact without specific Board direction. Written press releases should be referred to the respective Board

Chairman for review. All media contacts will be reported to the respective Board immediately using e-mail as part of the Staff Activity and the attached Report of Media Contact.

LACERA BOARD MEMBER TRUSTEES:

In order to achieve the purposes of the press policy, Board members Trustees should be encouraged to refer inquiries directly to the CEO or CIO.

In the event that a Board member Trustee does respond to a media inquiry, discretion should be used to limit the discussion to formally approved Board or LACERA policies and actions. Personal opinions and speculation as to the motivations of the Board or any Board Trustee or staff member are to be avoided. Any personal opinion given must be clearly identified as such.

As a courtesy to other Board members Trustee, all such contacts should be reported to the Board concerned at the earliest opportunity.

All Board contacts with outside parties, in which LACERA policies and practices are discussed, shall be conducted in accordance with the intent of this policy.

RESPONSES TO MEDIA REPORTS:

Generally, LACERA representatives will not initiate contacts with the media. News stories related to LACERA, even when positive in content, often provoke consternation and concern among our participants and beneficiaries. However, if a news story contains clearly inaccurate information, authorized LACERA representatives will contact the author and/or publication responsible for the inaccuracy in order to request a correction. Such instances shall be reported to the respective LACERA Boards.

Editorials or opinion pieces will be addressed as necessary by "letters to editor." Such communications will be submitted to the Board for approval prior to their release.

Executive Office staff will prepare position papers on media articles for staff to use when responding to member inquiries. Copies of these "position papers" will also be provided to Board members Trustees.

ATTENDANCE AT A CONFERENCE AND OTHER PUBLIC MEETINGS:

Board members Trustees and staff members representing LACERA at conferences and other public meetings should remember that reporters often attend such events. When making presentations or participating in discussions at such events, care should be taken not to speculate about past or future Board or LACERA policies and actions. Moreover, the expression of personal opinions should be avoided. If a personal opinion is given, it should be clearly identified as such. If media representatives are present when a LACERA representative makes a presentation, copies of the presentation materials should be provided to all Board members Trustees.

Approved: Board of Retirement, 2021; Board of Investments, 2021

LACERA REPORT OF MEDIA CONTACT

Prepared By

Date of Contact:

Reporter's Name:

Reporter's Phone Number:

Reporter's Employer:

Where Will the Story Be Aired?

When Will the Story Appear?

Is the Story for an Opinion Piece or a News Story?

What Prompted the Reporter's Interest?

What Topics Were Covered by the Reporter?

Distribution: ~~Members of the~~ Board of Retirement
~~Members of the~~ Board of Investments
Chief Executive Officer
Deputy Chief Executive Officer
Assistant Executive Officers
Chief Counsel
Chief Financial Officer
Chief, Communications

Attachment B
Clean Copy of Revised Media Policy



MEDIA POLICY

PURPOSE:

The purpose of creating a formal LACERA media policy is to ensure that the policies and actions of LACERA and the Boards of Retirement and Investments are accurately transmitted and explained to legitimate representatives of the mass media. The same policy will serve as a guide for communications with all outside parties, including the Board of Supervisors, Chief Executive Officer, County departments, employee organizations, and other industry groups.

Information subject to legal protection, including under the Brown Act, the Public Records Act, and other legal privileges, may not be disclosed.

LACERA STAFF:

The general spokesperson for LACERA is the Chief Executive Officer (CEO), or designee. The CEO is authorized to respond to legitimate inquiries by relaying any policy and action officially adopted by LACERA or the Board(s). This includes making available any documents which have been presented to the Board(s) and are therefore matters of public record or which are otherwise organizational records subject to disclosure under the Public Records Act.

Neither the CEO, nor any other LACERA employee, is authorized to speculate as to the intent or motivations of a Board Trustee or staff member. Personal opinions are to be avoided whenever possible. When a personal opinion is provided, discretion is to be utilized and the opinion is to be so identified to the inquiring party.

On Board of Investments policies and practices, the Chief Investment Officer (CIO), or designee, is the primary spokesperson. The CIO's discretion and restrictions are the same as those mentioned above.

The CEO, or designee, which may include the Deputy Chief Executive Officer (DCEO) and the Assistant Executive Officers (AEOs), is the primary spokesperson for Board of Retirement policies and practices and general administrative and benefits issues. The same discretionary authority and restrictions as those mentioned above apply to the designees.

On occasion, the CEO or CIO may designate a particular staff member as the sole and exclusive contact for a particular issue. Such designations will be made only to staff members who are technically proficient with respect to the subject of the designation and who can effectively deal with media representatives. The CEO and CIO, and designees, in their discretion may use LACERA's engaged public relations and media consultant, under the terms of their contract, to assist in communicating with the media and other outside parties.

As a general rule, LACERA staff members will not initiate any mass media contact without specific Board direction. Written press releases should be referred to the respective Board

Chair for review. All media contacts will be reported to the respective Board immediately using e-mail and the attached Report of Media Contact.

LACERA BOARD TRUSTEES:

In order to achieve the purposes of this policy, Board Trustees should be encouraged to refer inquiries directly to the CEO or CIO.

In the event that a Board Trustee does respond to a media inquiry, discretion should be used to limit the discussion to formally approved Board or LACERA policies and actions. Personal opinions and speculation as to the motivations of the Board or any Board Trustee or staff member are to be avoided. Any personal opinion given must be clearly identified as such.

As a courtesy to other Board Trustee, all such contacts should be reported to the Board concerned at the earliest opportunity.

All Board contacts with outside parties, in which LACERA policies and practices are discussed, shall be conducted in accordance with the intent of this policy.

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Generally, LACERA representatives will not initiate contacts with the media. News stories related to LACERA, even when positive in content, often provoke consternation and concern among our participants and beneficiaries. However, if a news story contains clearly inaccurate information, authorized LACERA representatives will contact the author and/or publication responsible for the inaccuracy in order to request a correction. Such instances shall be reported to the respective LACERA Board.

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Board Trustees and staff members representing LACERA at conferences and other public meetings should remember that reporters often attend such events. When making presentations or participating in discussions at such events, care should be taken not to speculate about past or future Board or LACERA policies and actions. Moreover, the expression of personal opinions should be avoided. If a personal opinion is given, it should be clearly identified as such. If media representatives are present when a LACERA representative makes a presentation, copies of the presentation materials should be provided to all Board Trustees.

Approved: Board of Retirement, _____ 2021; Board of Investments, _____ 2021

LACERA REPORT OF MEDIA CONTACT

Prepared By

Date of Contact:

Reporter's Name:

Reporter's Phone Number:

Reporter's Employer:

Where Will the Story Be Aired?

When Will the Story Appear?

Is the Story for an Opinion Piece or a News Story?

What Prompted the Reporter's Interest?

What Topics Were Covered by the Reporter?

Distribution: Board of Retirement
Board of Investments
Chief Executive Officer
Deputy Chief Executive Officer
Assistant Executive Officers
Chief Counsel
Chief Financial Officer
Chief, Communications



October 27, 2021

To: Board of Retirement

From: Committee on Board Roles and Responsibilities

Re: Recommendations for Revision of JOGC Charter

At its meeting of October 21, 2021, the Committee on Board Roles and Responsibilities voted to recommend a revised Charter for the Joint Organizational Governance Committee (JOGC) for consideration by the Board of Retirement. This report explains the reasons for the revisions and the Committee's recommendation to the Board. The primary basis for the recommendation is that CERL specifies those areas of responsibility that belong specifically to the Board of Retirement (BOR) and those that belong to the Board of Investment (BOI). The existing JOGC Charter confuses those boundaries. The proposed revised Charter simplifies the Charter and the JOGC's responsibilities to the core areas of the Boards' joint responsibilities.

The Committee identified the following responsibilities as solely those of the BOR¹. Where appropriate, CERL citations are noted.:

- i. Pension benefits administration upon service retirement.
(Section 31670.)*

¹The statutory list is taken from the March 27, 2018 memo from Chief Legal Officer Steven Rice and the accompanying endorsement dated June 15, 2018 from then fiduciary counsel Harvey Leiderman.

- ii. *Compensation earnable and pensionable compensation, including implementation of applicable provisions of PEPPRA. (Sections 7522.34, 31461.)*
- iii. *Disability retirement benefits administration. (Sections 31530, 31720 et seq.)*
- iv. *All other benefits and benefit-related issues. All other benefits and benefit-related issues under CERL and PEPPRA, including, for example, survivor benefits, death benefits, investigation of benefits questions, felony forfeiture, and reciprocity, are within the BOR's authority.*
- v. *Collections. The BOR oversees collection issues, including underpayment of contributions and overpayment of benefits.*
- vi. *Administrative appeals. The BOR has established and oversees an administrative appeals process, to provide due process and hears and decides member appeals with regard to plan administration issues.*
- vii. *Procedure for assessing and determining whether an element of compensation was paid to enhance benefits. (Section 31542.) The BOR is required to implement a procedure to address potential "pension spiking." If the BOR determines that compensation was paid to enhance a member's benefit, the member or employer may present evidence that the compensation was not paid for that purpose and request the BOR to reverse its decision. This requirement was implemented in part through the administrative appeals process described in (vi) above.*
- viii. *LACERA operations. All LACERA operational issues are addressed by the BOR, other than those assigned to the Boards jointly or to the BOI. This includes such important matters as privacy, Public Records Act requests, member communications, and all issues not specifically provided to be performed elsewhere.*
- ix. *Financial and accounting services. (Section 31593.) Aside from financial, actuarial, and auditing responsibilities of*

the BOI and the Audit Committee as explained above, the BOR monitors and supervises the Financial and Accounting Services Division and related financial reporting compliance issues and approves retention of LACERA's external financial auditor based on a recommendation from the Audit Committee.

- x. Personnel issues. The personnel function, which includes Human Resources, is part of the management of the system, and is therefore under the jurisdiction of the Board of Retirement. Personnel issues includes employment claims and litigation, excluding the CEO and the CAE, who report jointly to both Boards as noted above. It also excludes classification, compensation, and union contracts (although negotiations will be overseen by the BOR), which are joint board responsibilities. Boards have an interest in significant personnel issues concerning senior management, such as the Chief Counsel, who regularly advise the BOR. Accordingly, while the BOR will have oversight responsibility for most personnel issues, certain personnel issues may appropriately be addressed by both Boards working together or by the BOI alone.*
- xi. Aids to benefits administration. The BOR's broad authority over benefits, including service retirements, disability retirements, and other benefits, encompasses the ability to procure consultants and whatever other aids are necessary for the effective performance of that work.*
- xii. Tax compliance issues. The BOR oversees tax qualification issues and monitors that LACERA remains in compliance with applicable requirements of the Internal Revenue Code for plan qualification and member related matters such as withholding and tax reporting.*
- xiii. Adopt BOR regulations. (Sections 31525, 31526.)*
- xiv. Filling of BOR vacancies. (Section 31523.) The BOR is required to cause an election to be held at the earliest possible date for any vacancy in the elected positions.*

- xv. Separation from County service. (Section 31524.) Separation from County service of an elected member vacates the trustee's office.*
- xvi. 24 hours of trustee education. (Section 31522.8.) BOR trustees are required to obtain 24 hours of education every two years on the subjects listed in Section 31522.8.*
- xvii. Conflict of interest and "revolving door" limits. (Section 31528.)*
- xviii. Authority to obtain legal representation. (Sections 31529, 31529.1, 31529.5, 31529.6, 31529.9.)*
- xix. Litigation related to LACERA benefits, operations, and management, excluding investment related litigation.*
- xx. Issuance of subpoenas. (Section 31535.1)*
- xxi. Administration of the OPEB program. (Sections 31691, 31694.) The BOR administers the retiree healthcare program under the 1982 Agreement, as amended, with the County and under separate agreements with participating districts.*
- xxii. Approval of travel. The BOR has the responsibility under the Education and Travel Policy to approve travel and educational opportunities for its trustees according to the terms of the policy.*
- xxiii. Appointment of Committees as provided in BOR Regulations.*

Attached to this report is the revised JOGC Charter (Attachment A) as recommended by the Committee. It eliminates certain functions currently delegated to the JOGC and reduces the number of issues within the JOGC's designated portfolio of responsibilities.

In addition to some stylistic changes to comport with editorial changes, the following substantive changes were made in the revised draft charter as reflected in the attached draft:

Section 3 Purpose - Three of the stated purposes in the current charter have been eliminated, as explained below:

The first is “combined oversight of both Boards.” The Committee’s view was that the JOGC is designed to coordinate where the duties of the BOR and the BOI intersect as required by law, not to act as an oversight vehicle of the distinct duties of each Board.

The second was acting as a liaison between the two Boards. The Committee’s view is that communication can best be handled between the Chairs with the assistance of the CEO and other management. Using the JOGC in the current form created a blurring of the lines of the statutory duties unique to each Board.

The third recommended change was deleting the statement that the JOGC’s purpose was to ensure that each Board is comfortable that its perspectives are properly represented. The Committee expressed the view that this shared perspective should be reserved to the specific duties conferred jointly in the Boards by CERL.

Section 4 Scope - The Committee recommended combining certain responsibilities and eliminating others as set forth below. As the Scope is expanded in Section 7, the corresponding changes in that Section of the current Charter are also discussed here:

Eliminated were “Organizational Philosophy,” “CEO Search,” “Legislation, Engagement and Advocacy,” and “Board disputes.” The Committee expressed the belief that these were too general and again lead to responsibility drift. Reference to Organizational Philosophy in Section 7.1, Legislation in Section 7.5 and Board Disputes in Section 7.8 was also eliminated.

The scope for CEO Search was altered to assistance in recommending a consultant for both CEO and Chief Legal Officer vacancies as those positions equally serve both Boards. This is also referenced in a change to current Section 7.7 (renumbered as 7.4) Current Section 7.5 (renumbered as 7.3) relating to claims and litigation has been narrowed to litigation involving senior staff and other litigation affecting the interests of both Boards. The Committee recommended that litigation concerning senior staff would be managed with assistance from the CEO and the Chief Legal Officer.

“Education and Travel” was combined with “Joint Board Policy Development” to ensure that policies common to the statutory work of both Boards was uniform, while still leaving each Board the flexibility to tailor education and travel to its own needs. This is also reflected in existing

Section 7.4 (renumbered as 7.3)

Strategic Planning and Budgeting were divided into separate items. The former may involve the use of an outside consultant and primarily involves Board policy making, whereas budget development is largely a staff driven function. These functions are more specifically described in current Section 7.2 (renumbered as 7.1)

Classification and salaries of staff was added as this is a responsibility imposed on both Boards by law.

Lastly, a miscellaneous category was retained but made dependent on both Boards requesting the JOGC's assistance.

Section 10 Meeting Frequency:

The Committee members expressed concern about both the number of meetings (Board and committees) and the length of meetings. This would suggest an increase in the amount of delegation to staff of ministerial matters may be desirable. As a result of the recommended changes in the mission of the JOGC, a fixed meeting schedule was eliminated in favor of meetings called at the joint request of the Board Chairs.

Implementation of the Recommendations:

The current JOGC membership (whether the name is retained or not) could serve as a committee to vet and reach a preliminary consensus on the above issues. Once properly vetted, they could be presented for adoption jointly by the BOR and BOI. The above recommendations are consistent with the recommendation of the Committee. In particular, paragraph 7.3 (formerly 7.5) reflects the Committee's belief that in personnel matters, the direct involvement of the CEO and Chief Legal Officer are essential.

Additional Recommendation proposed by Fiduciary Counsel

In the course of the Committee's work, it was noted by Fiduciary Counsel that LACERA has a significant number of policies and procedures in separate documents. In addition to the Charter revisions, Fiduciary Counsel recommended creating a master index of all policies which could aid Board members, staff, and advisors in assuring that advice and subsequent decision-making was consistent with existing practice. That

does not suggest that once developed, policies and practices should remain unchanged. The Boards were specifically granted rule making authority so that the constantly changing needs of the System allowed for a dynamic process of policy change. This is regular and critical review of policies and practices by each Board itself a sound fiduciary “best practice.” To that end, each Board could establish a regular schedule of policy review. In the alternative, the first step of that process could be delegated to staff or advisors. The Committee also adopted that recommendation by Fiduciary Counsel, and it is incorporated in the Committee’s recommendation to the Board of Retirement

Summary of Committee Action and Recommendations:

In summary, the following action was unanimously recommended by the Committee to the Board of Retirement:

1. Approve the revised JOGC Charter, which would then need to be forwarded to the BOI for its consideration; and
2. Direct staff to create a master index of existing BOR (and BOI) policies, practices, and documents into a single, consolidated resource.

ATTACHMENTS

ATTACHMENT A

JOGC Charter (Red-Lined Version)



LOS ANGELES COUNTY EMPLOYEES RETIREMENT ASSOCIATION

Joint Organizational Governance Committee Charter

Revised and Restated
Adopted by Board of Retirement on May 1, 2019
Adopted by the Board of Investments on May 15, 2019

LACERA
Joint Organizational Governance Committee Charter

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LACERA
Joint Organizational Governance Committee Charter

1 Overview of the LACERA Board of Retirement and the Board of Investments¹

The Los Angeles County Employees Retirement Association (LACERA) is a public pension system formed in 1937 in accordance with the County Employees Retirement Law of 1937 (the '37 Act or CERL) and administered pursuant to the '37 Act, the California Public Employees' Pension Reform Act of 2013 (PEPRA), and the California Constitution. ~~Since 1971, LACERA has also administer~~see the Retiree Healthcare Benefits Program for the County and outside districts, through contractual agreements with the County, and the Other Postemployment Benefits Program (OPEB) trusts formed by the County, LACERA, and the Los Angeles Superior Court to provide support for the retiree health program in the future.

LACERA is an independent governmental entity. LACERA is the largest county retirement system in America. LACERA is funded by the County, participating employers, employees, and investment earnings.

LACERA is governed by two Boards. Both Boards include a mix of trustees that are appointed and elected members and an ex-officio member, the sitting County Treasurer and Tax Collector. The Board of Retirement (BOR) is responsible for the overall management of the retirement system and the LACERA-administered Retiree Healthcare Benefits Program. The Board of Investments (BOI) is responsible for determining LACERA's investment objectives, strategies, and policies, as well as exercising authority and control over the investment management of the Fund. The BOI also invests and manages the ~~Other Postemployment Benefits Program (OPEB) trust~~OPEB trust assets for participating employers. In addition, the BOI is responsible for obtaining pension actuarial valuations that measure the funded status and serve as the basis for setting employer and employee contribution rates required to fund the system. The BOR is responsible for obtaining actuarial valuations for the OPEB Program as part of its responsibility for administration of the OPEB Program.

The BOR and BOI have joint authority under CERL over certain shared responsibilities, including: classification and compensation of personnel; adoption of LACERA's administrative budget; the appointment and evaluation of the Chief Executive Officer (CEO); and other matters as specified in CERL.

Under the California Constitution, the Boards have plenary authority over administration of the pension fund.

¹ For a detailed analysis of the statutory duties of each board and their joint duties, please review the memorandum from Chief Legal Officer Steven Rice date March 27, 2018 and the concurrence from then fiduciary counsel Harvey Leiderman dated June 15, 2018.

Joint Organizational Governance Committee Charter

2 Purpose of this Document

The purpose of this document is to describe:

- the purpose, scope, responsibilities, meetings, and structure of the Joint Organizational Governance Committee (JOGC);

LACERA
Joint Organizational Governance Committee Charter

- the committee’s membership and leadership; and
- meeting frequency and dates.

3 Purpose of the JOGC

The purpose of the JOGC is to:

- serve and facilitate the work of both Boards when the two boards duties intersect;
- make recommendations, not decisions.

4 Scope

The scope of the JOGC’s responsibilities, as explained and defined in Section 7, includes:

- Strategic Planning;
- ~~Budgeting;~~
- Joint Board Policy Development for ~~s~~System-wide policies such as ethics, conflict of interest, media, and education and travel;
- Senior Staff Related Employment Litigation and other litigation affecting the interests of both Boards ;
- Assist in recommending Search Consultant for Chief Executive Officer and Chief Legal Officer-;
- ~~Recommendations concerning selection of CEO, Chief Legal Officer, and Fiduciary Counsel serving both Boards~~
- ~~Such other assistance as may be jointly requested by the Boards; and~~
- ~~Classification and salaries of staff (consistent) with County Ordinance~~

5 Powers Reserved for the BOR and BOI

The BOR reserves for itself all powers related to (i) retirement and healthcare benefits including policy, legislation, litigation, operations, and administration, and (ii) actuarial valuations of the OPEB Program.

The BOI reserves for itself all powers related to (i) investments, including policy, legislation,

LACERA

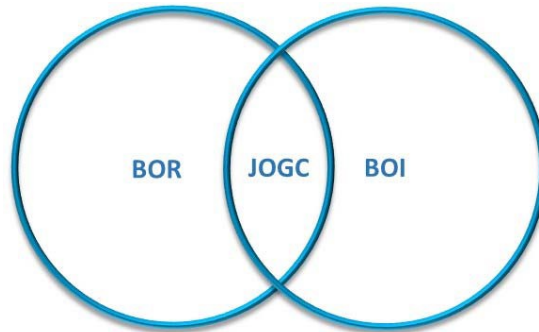
Joint Organizational Governance Committee Charter

litigation, operations, and administration, (ii) actuarial valuations of the pension fund, and (iii) oversight of the OPEB Trusts.

LACERA
Joint Organizational Governance Committee Charter

6 Authority

The JOGC will only make recommendations to each Board on matters that intersect and affect both the BOR and BOI as described in Section 7, Responsibilities of this Charter. The following Venn diagram visually highlights the JOGC role to facilitate the work of both Boards when the Boards' duties intersect.



7 Responsibilities

7.1 Strategic Planning and Budgeting

Provide guidance on the development of a three-year strategic plan and the associated annual budgeting process for the Administrative, Retiree Healthcare, OPEB Program, and Non-Administrative budgets and make recommendations to the Boards, including the following:

- Strategic Plan: Provide oversight and guidance on the development of a three-year strategic plan that will guide the annual budgeting process, including resources needed to achieve organizational objectives.

In providing input and guidance on the development of the strategic plan, and associated budget plans, the JOGC will take into account, but will not reconsider, actions taken by the Boards within the areas of their separate jurisdiction, including the Board of Retirement for pension, healthcare, and administrative matters and the Board of

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Investments for investment-related strategic planning. The JOGC's role reflects an understanding that the entire budget process for LACERA, under Government Code Section 31580.2, is subject to the approval of both Boards, and that therefore oversight and guidance for the development of the budget is a joint Board responsibility, based in part upon actions taken by the Boards separately, including vendor selections and other matters.

Additionally, the JOGC's role reflects an understanding that each three-year strategic plan is a rolling plan and will also take into account past strategic plan initiatives that have already been set in motion and for which resources have already been allocated and expended as they provide input on new expectations and initiatives.

- Staffing Needs.
 - Staff Classifications: Review and make recommendations on staff requests to create all new Staff Member classifications.
 - Staff Compensation: Review and make recommendations on Staff Member requests related to:
 - Negotiation and approval of collective bargaining agreements;
 - Approval of initial compensation levels and ranges applicable to new positions to be added to the County Code;
 - Approval of compensation level and range changes for existing positions that require changes to the County Code; and
 - Budgeting for compensation to be provided for existing positions within existing County Code ranges.
- Budget Development: Provide guidance during the annual budget development cycle for the Administrative, Retiree Healthcare, OPEB Program, and Non-Administrative budgets. The staff will develop preliminary budget plans that take into account and support the approved strategic plans and general operating needs. The JOGC will review and provide a recommendation regarding the proposed budgets which will in turn be presented to the Boards during budget hearings. Both Boards will then independently take action on the JOGC's recommended proposed budget.

Staff will present a three-year strategic plan for the SS system as a whole incorporating the strategic plan of each Board and annual budget plan development process, including a proposed JOGC meeting schedule with respect to planning and budget issues, for the JOGC's approval. This process will govern how the organization will conduct the strategic plan and budgeting process on an annual basis. Once approved the process will remain in effect until reviewed and modified

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by the JOGC and staff, with a mandatory review every six years.

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The JOGC will complete its strategic planning and budgeting responsibilities on a timetable outlined in the approved annual strategic planning and budgeting process. All plans will include presentation of the budget to the Boards for final approval no later than June of each year.

On-going Oversight: Once a three-year strategic plan and annual budget is approved the JOGC will provide on-going oversight of the budget-to-actual results and the progress made towards fulfilling the Strategic Plan initiatives of each Board and the combined Strategic Plan for the ~~s~~System as a whole, during the fiscal year according to a schedule approved by the Committee in consultation with the staff.

By this section, the JOGC does not assume and will not exercise any responsibility as Appointing Authority not granted to the Boards under the Los Angeles County Code, including Section 5 (Personnel) and Section 6 (Salaries), or otherwise in conflict with the County Code and LACERA Policy.

~~7.2 — Education and Travel~~

~~Oversee and make recommendations with respect to the:~~

- ~~• Education and Travel Policy; and~~
- ~~• Other training issues relevant to both Boards as needed.~~

~~7.3~~7.2 Joint Policies

When not otherwise reserved to either the BOR or the BOI, assist in the ~~development of and make recommendations with respect to all joint policies, such as ethics, conflict of interest, media, and education and travel as outlined in Section 4, .~~

~~7.4 — Legislation, Engagement, and Advocacy~~

~~May make recommendations about legislation, engagement, and advocacy that impact both Boards.~~

~~7.5~~7.3 Litigation and Claims

Make recommendations about employment related and other Litigation and Claims affecting the interests of both Boards as described in Section 4. In matters specifically related to employment litigation concerning senior staff that serve both Boards, the CEO and Chief Legal Officer shall participate in the Committee's deliberations.

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. They may also include any other Litigation and Claims, including onesthat each Board is generally expected to separately manage, that the Board Chairs, the CEO, or Chief Counsel reasonably believe justify the involvement of this Committee because of mutual interest and concern to both Boards.

Litigation and Claims are defined as court actions, pre-litigation demands or claims, potential court actions, demands, or claims, and other forms of dispute resolution, such as arbitration and mediation.

Each Board is generally expected to separately manage:

- (1) As to the Board of Retirement, Litigation and Claims relating to the regular course of business regarding retirement, disability, and healthcare benefits, all LACERA personnel (other than the Chief Executive Officer, and all those reporting directly to them or as to whom the Boards or any of their committees have an Appointing Authority role as stated in this section), and the general operations and administration of the retirement system and the OPEB Program (including actuarial services for the OPEB Program),
- (2) As to the Board of Investments, Litigation and Claims relating to the regular course of business regarding investments, pension actuarial services, and the OPEB Trusts, and
- (3) Litigation and Claims concerning contracts approved only by that Board.

By this section, the JOGC does not assume any responsibility as Appointing Authority not granted to the Boards under the Los Angeles County Code, including Section 5 (Personnel) and Section 6 (Salaries) or otherwise in conflict with the County Code.

[7.67.4](#) Chief Executive Officer and Chief Legal Officer

Should a vacancy occur:

- Make a recommendation for a search consultant; and
- Provide such additional assistance in the selection process as the Boards may determine at the time.

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[7.7.5](#) **Miscellaneous Matters**

Miscellaneous matters that may need to be brought before the JOGC will be determined on a case by case basis by the respective Board Chairs and the Chair of the JOGC in consultation with the CEO. Additionally, miscellaneous matters may be brought before the JOGC by any JOGC member.

8 Membership, Quorum, and Rules

There will be eight (8) members with no designated alternates. The JOGC will be comprised of the BOR and BOI Chairs and Vice-Chairs plus one member appointed by each Chair and one member elected by each Board. In making their appointment, each Chair will endeavor to include an overall mix of trustees who are appointed by the Board of Supervisors, elected by active employees (general and safety), elected by retired members, and who serve in an ex officio capacity. The Chairs will also consider continuity of service when appointing members, so that development of expertise and familiarity with the subject matters jurisdictional to the JOGC are encouraged, and to benefit the JOGC's goals.

If there is one JOGC member who represents both Boards (one overlap), then an additional appointment will be made by the BOR Chair in even years and by the BOI Chair in odd years. If there is more than one overlap, the BOR and BOI Chairs will make an equal number of additional appointments; if there are an odd number of overlaps, the final appointment, after the Board Chairs make their separate appointments, will be made following the rule as stated in the preceding sentence that applies in the case of one overlap.

A quorum exists when a majority of the members are present, without regard to the Board from which individual members were appointed.

The JOGC is subject to the Ralph M. Brown Act (Brown Act), and its meetings will be noticed, agendized, and conducted in accordance with the Brown Act. The JOGC may meet in closed session as provided in the Brown Act.

Robert's Rules of Order will also apply in the JOGC's meetings. A motion may be made or seconded by any member. A motion passes if a majority of the members present, without regard to the Board from which they were appointed, vote in favor of the motion.

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9 Leadership

The Chair and Vice Chair of the JOGC will be elected by members of the JOGC at the first meeting of each year.

10 Meeting Frequency and Dates

10.1 Frequency

The Committee shall meet as needed with the concurrence of the Board Chairs ~~with exception of budget. Meetings related to budget and strategic planning shall be scheduled _____~~. All meetings shall be noticed in accordance with the Ralph M. Brown Act.

10.2 Dates

To the extent possible, meetings will alternate between scheduled BOR and BOI meetings, and as needed.

11 Charter Review

The BOR and BOI shall review and update this Charter, based on recommendations from the JOGC, at least once every three years.

~~This Charter was adopted by the Board of Retirement on _____ and by the Board of Investments on _____.~~

HISTORY:

Revised and Restated by the Board of Retirement on _____ and by the Board of Investments on _____.

ATTACHMENT B

JOGC Charter (Clean Version)



LOS ANGELES COUNTY EMPLOYEES RETIREMENT ASSOCIATION

Joint Organizational Governance Committee Charter

Revised and Restated
Adopted by Board of Retirement on May 1, 2019
Adopted by the Board of Investments on May 15, 2019

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Joint Organizational Governance Committee Charter

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LACERA
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1 Overview of the LACERA Board of Retirement and the Board of Investments¹

The Los Angeles County Employees Retirement Association (LACERA) is a public pension system formed in 1937 in accordance with the County Employees Retirement Law of 1937 (the '37 Act or CERL) and administered pursuant to the '37 Act, the California Public Employees' Pension Reform Act of 2013 (PEPRA), and the California Constitution. LACERA also administers the Retiree Healthcare Benefits Program for the County and outside districts, through contractual agreements with the County, and the Other Postemployment Benefits Program (OPEB) trusts formed by the County, LACERA, and the Los Angeles Superior Court to provide support for the retiree health program in the future.

LACERA is an independent governmental entity. LACERA is the largest county retirement system in America. LACERA is funded by the County, participating employers, employees, and investment earnings.

LACERA is governed by two Boards. Both Boards include a mix of trustees that are appointed and elected members and an ex-officio member, the sitting County Treasurer and Tax Collector. The Board of Retirement (BOR) is responsible for the overall management of the retirement system and the LACERA-administered Retiree Healthcare Benefits Program. The Board of Investments (BOI) is responsible for determining LACERA's investment objectives, strategies, and policies, as well as exercising authority and control over the investment management of the Fund. The BOI also invests and manages the OPEB trust assets for participating employers. In addition, the BOI is responsible for obtaining pension actuarial valuations that measure the funded status and serve as the basis for setting employer and employee contribution rates required to fund the system. The BOR is responsible for obtaining actuarial valuations for the OPEB Program as part of its responsibility for administration of the OPEB Program.

The BOR and BOI have joint authority under CERL over certain shared responsibilities, including classification and compensation of personnel; adoption of LACERA's administrative budget; the appointment and evaluation of the Chief Executive Officer (CEO); and other matters as specified in CERL.

Under the California Constitution, the Boards have plenary authority over administration of the pension fund.

2 Purpose of this Document

The purpose of this document is to describe:

¹ For a detailed analysis of the statutory duties of each board and their joint duties, please review the memorandum from Chief Legal Officer Steven Rice date March 27, 2018 and the concurrence from then fiduciary counsel Harvey Leiderman dated June 15, 2018.

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- the purpose, scope, responsibilities, meetings, and structure of the Joint Organizational Governance Committee (JOGC);
- the committee’s membership and leadership; and
- meeting frequency and dates.

3 Purpose of the JOGC

The purpose of the JOGC is to:

- serve and facilitate the work of both Boards when the two boards duties intersect;
- make recommendations, not decisions.

4 Scope

- The scope of the JOGC’s responsibilities, as explained and defined in Section 7, includes: Strategic Planning;
- Budgeting; Joint Board Policy Development for system-wide policies such as ethics, conflict of interest, media, and education and travel;
- Senior Staff Related Employment Litigation and other litigation affecting the interests of both Boards ;
- Assist in recommending Search Consultant for Chief Executive Officer and Chief Legal Officer;
- Such other assistance as may be jointly requested by the Boards; and Classification and salaries of staff

5 Powers Reserved for the BOR and BOI

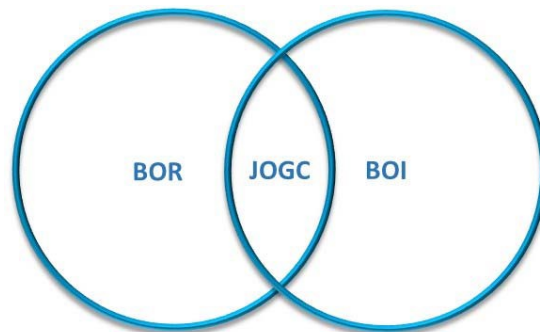
The BOR reserves for itself all powers related to (i) retirement and healthcare benefits including policy, legislation, litigation, operations, and administration, and (ii) actuarial valuations of the OPEB Program.

The BOI reserves for itself all powers related to (i) investments, including policy, legislation, litigation, operations, and administration, (ii) actuarial valuations of the pension fund, and (iii) oversight of the OPEB Trusts.

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6 Authority

The JOGC will only make recommendations to each Board on matters that intersect and affect both the BOR, and BOI as described in Section 7, Responsibilities of this Charter. The following Venn diagram visually highlights the JOGC role to facilitate the work of both Boards when the Boards' duties intersect.



7 Responsibilities

7.1 Strategic Planning and Budgeting

Provide guidance on the development of a three-year strategic plan and the associated annual budgeting process for the Administrative, Retiree Healthcare, OPEB Program, and Non-Administrative budgets and make recommendations to the Boards, including the following:

- Strategic Plan: Provide oversight and guidance on the development of a three-year strategic plan that will guide the annual budgeting process, including resources needed to achieve organizational objectives.

In providing input and guidance on the development of the strategic plan, and associated budget plans, the JOGC will take into account, but will not reconsider, actions taken by the Boards within the areas of their separate jurisdiction, including the Board of Retirement for pension, healthcare, and administrative matters and the Board of Investments for investment-related strategic planning. The JOGC's role reflects an understanding that the entire budget process for LACERA, under Government Code Section 31580.2, is subject to the approval of both Boards, and that therefore oversight and guidance for the development of the budget is a joint Board responsibility, based in part upon actions taken by the Boards separately, including vendor selections and other matters.

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Additionally, the JOGC's role reflects an understanding that each three-year strategic plan is a rolling plan and will also take into account past strategic plan initiatives that have already been set in motion and for which resources have already been allocated and expended as they provide input on new expectations and initiatives.

- Staffing Needs.
 - Staff Classifications: Review and make recommendations on staff requests to create all new Staff Member classifications.
 - Staff Compensation: Review and make recommendations on Staff Member requests related to:
 - Negotiation and approval of collective bargaining agreements;
 - Approval of initial compensation levels and ranges applicable to new positions to be added to the County Code;
 - Approval of compensation level and range changes for existing positions that require changes to the County Code; and
 - Budgeting for compensation to be provided for existing positions within existing County Code ranges.
- Budget Development: Provide guidance during the annual budget development cycle for the Administrative, Retiree Healthcare, OPEB Program, and Non- Administrative budgets. The staff will develop preliminary budget plans that take into account and support the approved strategic plans and general operating needs. The JOGC will review and provide a recommendation regarding the proposed budgets which will in turn be presented to the Boards during budget hearings. Both Boards will then independently take action on the JOGC's recommended proposed budget.

Staff will present a three-year strategic plan for the system as a whole incorporating the strategic plan of each Board and annual budget plan development process, including a proposed JOGC meeting schedule with respect to planning and budget issues, for the JOGC's approval. This process will govern how the organization will conduct the strategic plan and budgeting process on an annual basis. Once approved the process will remain in effect until reviewed and modified by the JOGC and staff, with a mandatory review every six years.

The JOGC will complete its strategic planning and budgeting responsibilities on a timetable outlined in the approved annual strategic planning and budgeting process. All plans will include presentation of the budget to the Boards for final approval no later than June of each year.

On-going Oversight: Once a three-year strategic plan and annual budget is approved the JOGC

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will provide on-going oversight of the budget-to-actual results and the progress made towards fulfilling the Strategic Plan initiatives of each Board and the combined Strategic Plan for the system as a whole, during the fiscal year according to a schedule approved by the Committee in consultation with the staff.

By this section, the JOGC does not assume and will not exercise any responsibility as Appointing Authority not granted to the Boards under the Los Angeles County Code, including Section 5 (Personnel) and Section 6 (Salaries), or otherwise in conflict with the County Code and LACERA Policy.

7.2 Joint Policies

When not otherwise reserved to either the BOR or the BOI, assist in the development of and make recommendations with respect to all joint policies, such as ethics, conflict of interest, media, and education and travel.

7.3 Litigation and Claims

Make recommendations about employment related and other Litigation and Claims affecting the interests of both Boards as described in Section 4. In matters specifically related to employment litigation concerning senior staff that serve both Boards, the CEO and Chief Legal Officer shall participate in the Committee's deliberations.

They may also include any other Litigation and Claims, including one that each Board is generally expected to separately manage, that the Board Chairs, the CEO, or Chief Counsel reasonably believe justify the involvement of this Committee because of mutual interest and concern to both Boards.

Litigation and Claims are defined as court actions, pre-litigation demands or claims, potential court actions, demands, or claims, and other forms of dispute resolution, such as arbitration and mediation.

Each Board is generally expected to separately manage:

- (1) As to the Board of Retirement, Litigation and Claims relating to the regular course of business regarding retirement, disability, and healthcare benefits, all LACERA personnel (other than the Chief Executive Officer, and all those reporting directly to them or as to whom the Boards or any of their committees have an Appointing Authority role as stated in this section), and the general operations and administration of the retirement system and the OPEB Program (including actuarial services for the OPEB Program),
- (2) As to the Board of Investments, Litigation and Claims relating to the regular course of business regarding investments, pension actuarial services, and the OPEB Trusts, and

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(3) Litigation and Claims concerning contracts approved only by that Board.

By this section, the JOGC does not assume any responsibility as Appointing Authority not granted to the Boards under the Los Angeles County Code, including Section 5 (Personnel) and Section 6 (Salaries) or otherwise in conflict with the County Code.

7.4 Chief Executive Officer and Chief Legal Officer

Should a vacancy occur:

- Make a recommendation for a search consultant; and
- Provide such additional assistance in the selection process as the Boards may determine at the time.

7.5 Miscellaneous Matters

Miscellaneous matters that may need to be brought before the JOGC will be determined on a case by case basis by the respective Board Chairs and the Chair of the JOGC in consultation with the CEO. Additionally, miscellaneous matters may be brought before the JOGC by any JOGC member.

8 Membership, Quorum, and Rules

There will be eight (8) members with no designated alternates. The JOGC will be comprised of the BOR and BOI Chairs and Vice-Chairs plus one member appointed by each Chair and one member elected by each Board. In making their appointment, each Chair will endeavor to include an overall mix of trustees who are appointed by the Board of Supervisors, elected by active employees (general and safety), elected by retired members, and who serve in an ex officio capacity. The Chairs will also consider continuity of service when appointing members, so that development of expertise and familiarity with the subject matters jurisdictional to the JOGC are encouraged, and to benefit the JOGC's goals.

If there is one JOGC member who represents both Boards (one overlap), then an additional appointment will be made by the BOR Chair in even years and by the BOI Chair in odd years. If there is more than one overlap, the BOR and BOI Chairs will make an equal number of additional appointments; if there are an odd number of overlaps, the final appointment, after the Board Chairs make their separate appointments, will be made following the rule as stated in the preceding sentence that applies in the case of one overlap.

A quorum exists when a majority of the members are present, without regard to the Board from which individual members were appointed.

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The JOGC is subject to the Ralph M. Brown Act (Brown Act), and its meetings will be noticed, agendaized, and conducted in accordance with the Brown Act. The JOGC may meet in closed session as provided in the Brown Act.

Robert's Rules of Order will also apply in the JOGC's meetings. A motion may be made or seconded by any member. A motion passes if a majority of the members present, without regard to the Board from which they were appointed, vote in favor of the motion.

9 Leadership

The Chair and Vice Chair of the JOGC will be elected by members of the JOGC at the first meeting of each year.

10 Meeting Frequency and Dates

10.1 Frequency

The Committee shall meet as needed with the concurrence of the Board Chairs. All meetings shall be noticed in accordance with the Ralph M. Brown Act.

10.2 Dates

To the extent possible, meetings will alternate between scheduled BOR and BOI meetings, and as needed.

11 Charter Review

The BOR and BOI shall review and update this Charter, based on recommendations from the JOGC, at least once every three years.

HISTORY:

Revised and Restated by the Board of Retirement on _____ and by the Board of Investments on _____.

ATTACHMENT C

April 4, 2018 - Joint and Separate Responsibilities of
the Boards Memo

FOR INFORMATION ONLY

March 27, 2018

TO: Each Member
Board of Retirement
Board of Investments

FROM: Steven P. Rice *SPR*
Chief Counsel

FOR: April 4, 2018 Joint Board of Retirement and Board of Investments Meeting

SUBJECT: Joint and Separate Responsibilities of the Boards

At the March 15, 2018 Board of Retirement (BOR) meeting, certain BOR members requested a legal analysis of the joint and separate responsibilities of the BOR and the Board of Investments (BOI) (together, Boards) in order to facilitate a clear understanding and compliance with applicable law.

LEGAL AUTHORITY

The responsibilities of the Boards are enumerated in Article XVI, Section 17 of the California Constitution, the County Employees Retirement Law of 1937 (CERL), Cal. Gov't Code §§ 31450, *et seq.*, the California Public Employees' Pension Reform Act of 2013 (PEPRA), Cal. Gov't Code §§ 7522, *et seq.*, and the Internal Revenue Code, 26 U.S.C. §§ 401(a), *et seq.*

The Boards' overarching plenary authority and fiduciary responsibilities are addressed in Article XVI, Section 17 of the Constitution. Article XVI, Section 17 applies generally to all California public pension boards. The Constitution does not change the division of responsibilities between the Boards as established in CERL.

Specific operational responsibilities of the Boards are set forth in CERL and PEPRA, which describe the duties of LACERA's Boards in detail.

LACERA is the only California public pension system that has separate boards for administration and investments (although a number of California charter cities have established separate pension funds and boards for safety and general members).

DISCUSSION

A. Constitution.

Under Article XVI, Section 17 of the Constitution, "the retirement board of a public pension or retirement system shall have plenary authority and fiduciary responsibility for

investment of moneys and administration of the system.” The Constitution only uses the singular term “retirement board,” but it does not create that board. Rather, the Constitution confers duties on governing board(s) otherwise established by plan sponsor agencies under the laws that provide for their respective plans. For example, the Public Employees’ Retirement Law, Cal. Gov’t Code §§ 20000, *et seq.* (PERL), establishes the Board of CalPERS; the Teachers’ Retirement Law, Cal. Ed. Code §§ 22000, *et seq.*, establishes the Board of CalSTRS. So, too, CERL authorizes the twenty California counties adopting the CERL to establish the retirement boards for their respective county systems. For Los Angeles County, CERL authorized the County to establish two boards for jointly governing a single retirement system, and the County exercised that authority to create the BOI. Because of the unique authority granted by CERL, both LACERA Boards have constitutional fiduciary obligations that are important to the performance of their coordinated governance of the retirement system. The Boards both have the same constitutional mission and the same fiduciary duties of prudence and loyalty. It is important to review these fiduciary duties because they have a direct bearing on how the Boards should interact with each other in considering their joint and separate operational responsibilities under CERL.

Article XVI, Section 17 provides for the following duties, which apply to both the BOR and the BOI:

- “The retirement board . . . shall have the sole and exclusive fiduciary responsibility over the assets” of the system. (Section 17(a).)
- “The retirement board shall also have sole and exclusive responsibility to administer the system in a manner that will assure prompt delivery of benefits and related services to the participants and their beneficiaries.” (Section 17(a).)
- Fund assets “are trust funds and shall be held for the exclusive purposes of providing benefits to participants . . . and their beneficiaries and defraying reasonable expenses of administering the system.” (Section 17(a).)
- Trustees “shall discharge their duties with respect to the system solely in the interest of, and for the exclusive purposes of providing benefits to, participants and their beneficiaries, minimizing employer contributions thereto, and defraying reasonable expenses of administering the system. A retirement board’s duty to its participants and their beneficiaries shall take precedence over any other duty.” This is the duty of loyalty. (Section 17(b); *see also* CERL, Section 31595(a).)
- Trustees “shall discharge their duties with respect to the system with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with these matters would

use in the conduct of an enterprise of a like character and with like aims.” This is the duty of prudence. (Section 17(b).)

In addition, Article XVI, Section 17 includes two duties that apply to the BOI, although the BOI is not mentioned by name:

- Trustees “shall diversify the investments of the system so as to minimize the risk of loss and to maximize the rate of return, unless under the circumstances it is clearly not prudent to do so.” (Section 17(d); see *also* CERL, Section 31595(c).)
- The board, “consistent with the exclusive fiduciary responsibilities vested in it, shall have the sole and exclusive power to provide for actuarial services in order to assure the competency of the assets of the public pension or retirement system.” (Section 17(e).)

The BOR and BOI share the same constitutional fiduciary duties in furtherance of the same purpose. The trustees of the boards are co-fiduciaries of the retirement system. The Boards must work together to achieve the purpose of the fund. The need to work together is a constitutional requirement that follows from the duty of prudence because any reasonable trustee in a like position must cooperate fully with their trustees on the other board. Joint effort also follows from the duty of loyalty because the interests of the members and their beneficiaries could be impaired if there are jurisdictional disagreements between the Boards. The Boards must respect clear lines drawn in CERL as to their separate and joint authorities. The Boards should also be flexible and collaborative in addressing ambiguities in the law as to board authority where they exist in CERL and PEPRA and in addressing special circumstances that may prudently require joint action or joint communication.

B. CERL and PEPRA.

1. Background.

a. BOR.

Section 31520 of CERL provides, “Except as otherwise delegated to the board of investments and except for statutory duties of the county treasurer,¹ the management of the retirement system is vested in the board of retirement” Section 31520 provides for a five-member board of retirement. However, where a system (like LACERA) provides for safety member contributions and retirement, Section 31520.1 provides for a nine-

¹ CERL provides that the Boards may delegate certain responsibilities, such as the holding and investment of assets, to the treasurer. The Boards have not exercised this authority.

member board of retirement, with an alternate safety member. The nine members include four elected by the members (two by general members, one by safety members, and one by retired members), four appointed by the board of supervisors, and the county treasurer, sitting ex officio. Section 31520.5 provides for a retired member alternate to the board of retirement.

LACERA has had its Board of Retirement since the fund's formation in 1938.

b. BOI.

Section 31520.2 provides that, in any county with over \$800 million in assets, the board of supervisors may establish a nine-member board of investments. The membership of the board of investments follows the same pattern as described above for the board of retirement, except that there are no alternate members.

LACERA has had a Board of Investments since 1972, shortly after the Board of Supervisors voted to authorize it. LACERA is the only CERL system with a board of investments. Under Section 31520.2(b), "The board of investments shall be responsible for all investments of the retirement system."

2. Definition of "Board."

The responsibilities of the BOR and BOI are contained in various CERL and PEPRA provisions. Sometimes, the statutes are clear and specific as to which board is given a particular responsibility. Other provisions simply use the term "board" or are vague as to whether they apply to the BOR, the BOI, or both. Section 31459.1 provides a definition of "board" which is applicable only to LACERA, as follows:

(a) In a county in which a board of investments has been established pursuant to Section 31520.2:

(1) As used in Sections 31453, 31453.5, 31454, 31454.1, 31454.5, 31472, 31588.1, 31589.1, 31591, 31592.3, 31594, 31595.1, 31595.9, 31596, 31596.1, 31601.1, 31607, 31610, 31611, 31612, 31613, 31616, 31618, 31621.11, 31625, 31639.26, 31784, and 31872, "board" means board of investments.

(2) As used in the first paragraph of Section 31592.2 and the first paragraph and subdivision (c) of the second paragraph of Section 31595, "board" means a board of investments.

(3) Sections 31521, 31522, 31522.1, 31522.2, 31523, 31524, 31525, 31528, 31529, 31529.5, 31535.1, 31580.2, 31614, 31680, and 31680.1,

apply to both the board of retirement and board of investments, and “board” means either or both the board of retirement and board of investments.

(4) Subdivision (a) of Section 31526 and subdivisions (a) and (b) of the second paragraph of Section 31595 apply to both the board of retirement and board of investments, and “board” means either or both the board of retirement and board of investments.

(b) In Article 17 (commencing with Section 31880) of this chapter, “board” means the Board of Administration of the Public Employees’ Retirement System.

(c) In all other cases, “board” means the board of retirement.

(d) This section shall apply only in a county of the first class, as defined in Section 28020, as amended by Chapter 1204 of the Statutes of 1971, and Section 28022, as amended by Chapter 43 of the Statutes of 1961.

The specific CERL sections mentioned in Section 31459.1 are discussed in detail in the next section of this memo. Section 31459.1 does not list all provisions of CERL that specifically mention the board of investments. Other provisions must be interpreted in developing a list of the Boards’ responsibilities. In addition, it is important to note that Section 31459.1 is not itself a grant of authority to either board; it is a definitional section to assist in interpreting some but not all of the substantive provisions of CERL that describe specific areas of board responsibility.

3. Responsibilities and Authorities of the Boards.

As quoted above, Section 31520 states that “the management of the retirement system is vested in the board of retirement,” and Section 31520.2(b) provides that “The board of investments shall be responsible for all investments of the retirement system.” However, these statements are so general that they do not provide much practical guidance in understanding how the many specific functions of managing a public retirement system are to be handled by the Boards.

Understanding of the detailed allocation of responsibilities is found in the definition quoted above from Section 31459.1 and in other provisions of CERL that specifically mention one or both of the Boards. Based on Section 31459.1 and the rest of CERL, certain responsibilities belong to both the BOI and the BOR, certain responsibilities belong to the BOI, and everything else that is not specifically identified belongs to the BOR. The next three subsections of this memo list specific responsibilities that fall into each category. CERL is a long and complex statute, over 360 pages in length. There may be specific separate responsibilities of the BOR or BOI that are not listed below. However, the lists below include major responsibilities and authorities of the Boards.

a. Joint Responsibilities and Authorities of the BOR and BOI.

Under CERL, there are two specific responsibilities and authorities that require joint action of both the BOR and the BOI:

- i. Appointment of personnel.* (Sections 31522.1, 31522.2, 31522.4.) These provisions provide that “the board of retirement and both the board of retirement and board of investment may appoint” the retirement administrator and other staff. Since LACERA has both the BOR and BOI, the statutory language giving appointing authority to “both” the BOR and the BOI governs. Appointing authority includes the power to approve organizational staffing needs, classifications and classification changes, evaluation, compensation adjustments, and discipline. Accordingly, appointment of staff is a statutory joint responsibility of the Boards.

Long ago, the Boards determined to retain joint appointing authority over the Chief Executive Officer (CEO) and delegate appointing authority for all other positions, other than the Chief Audit Executive,² to the CEO. This structure is reflected in County Salary Ordinance provisions, as required by CERL.³

The Salary Ordinance provides, “The person appointed by the Boards of Retirement and Investments to act as retirement administrator pursuant to Government Code Section 31522.2, shall be known as the Chief Executive Officer.” (Ordinance 6.127.020(A).) The Salary Ordinance defines “Appointing Authority” for the CEO as “the board of retirement and the board of investments jointly” and for staff as the “retirement administrator.” (Ordinance 6.127.040(B)(1).)

² The Boards have determined that they are the appointing authority for the Chief Audit Executive (CAE) with respect to appointment, discipline, dismissal, and/or removal. The Audit Committee is the CAE’s appointing authority with respect to performance management and salary adjustments. The CAE reports to the CEO for administrative purposes. The role of the Boards, the Audit Committee, and CEO are fully described in the Audit Committee Charter. Note that changes to the Salary Ordinance to implement the system described in this footnote, as approved by the Boards in January 2017, are pending approval by the Board of Supervisors as of the date of this memo.

³ This structure is not unique to LACERA. A similar arrangement exists in the City of San José, which has separate boards to administer its Police and Fire Department Retirement Plan and its Federated City Employees’ Retirement System. By City Charter (Section 810.1(a)), however, the two boards have the authority to “jointly appoint the chief executive officer and the chief investment officer.”

The CEO's compensation "may be determined by written agreement between the boards of retirement and investments and such designated person." (Ordinance 6.127.030(B)(1); see also Ordinance 6.127.040(C).) The CEO's salary may be adjusted "by the boards of retirement and investments," even if it falls outside designated Salary Ranges. (Ordinance 6.127.030(B)(3).) The Boards jointly may authorize additional compensation to the CEO for "exceptional or extraordinary service." (Ordinance 6.127.030(B)(2).) The County's Table of Classes of Positions with Salary Schedule and Level does not state the CEO's compensation; instead, it refers back to the Board's joint compensation setting authority under Ordinance 6.127.020(A). (Ordinance 6.127.050, Note N37.)

Under the Ordinance, salary adjustments and performance management for LACERA staff are the responsibility of the CEO as Appointing Authority under Chapter 127 of the Ordinance.

The Boards also have the independent authority, by joint resolution, to create a Performance Compensation Program for LACERA employees. (Ordinance 6.127.030(C).)

The Boards may, by joint action, request a change in the Ordinance. However, at present, the structure for personnel is as described above. The Civil Services Rules are consistent, where applicable.

- ii. Budget approval. (Section 31580.2.) This statute provides that, where "the board of retirement, or the board of retirement and the board of investments, have appointed personnel . . . , the respective board or boards shall annually adopt a budget covering the entire expense of administration of the retirement system which expense shall be charged against the earnings of the retirement fund." At LACERA, since the Boards jointly appoint personnel under CERL as discussed above, the responsibility and authority to adopt a budget belongs as a matter of law under Section 31580.2 to both Boards acting jointly. This is in fact the way LACERA conducts its budget process.

Although appointment of personnel and budget approval are the only two specified areas of joint Board action under CERL and PEPR, there may be other important issues that flow from the specified areas or otherwise reasonably should be handled by both Boards. Examples include: litigation that presents significant organizational risks; union contracts; legislation that affects LACERA's overall governance structure; changes in LACERA's

Mission, Values, or Vision; joint committees such as the Audit Committee;⁴ policies that affect both Boards, such as the Audit Committee Charter, Education and Travel Policy, Legislative Policy, Code of Ethical Conduct, Conflict of Interest Code, and similar policies that cross board lines; and engagement of fiduciary counsel to advise both Boards. As noted above, a spirit of cooperation, collaboration, and flexibility is legally required among the Boards as a matter of their co-fiduciary duties in addressing other issues of joint interest.

b. BOI Responsibilities and Authorities.

CERL is generally structured so that the responsibilities and powers of the BOI are specifically identified. Any responsibilities and powers not given to the BOI belong to the BOR. Despite this structure, there are still some ambiguities because Section 31459.1 is not complete and other CERL and PEPR provisions are also ambiguous. Responsibilities and authorities that the BOI, and its trustees, may separately exercise as identified in governing law include the following:

- i. All investments.* (Sections 7514.2, 31520.2(b), 31594, 31595, 31595.1, 31595.9, 31601.1, 31602, 31603.) The BOI “shall be responsible for all investments of the retirement system.” (Section 31520.2(b).) The statutory authority is very broad. Investments may be made “in any form or type of investment deemed prudent” in compliance with the BOI’s fiduciary duties. (Section 31494.) Note that investments in real property require approval by at least six votes, except that nine votes are required if the Board of Supervisors or County Board of Education has a material interest. (Section 31601.1.) Investments in in-state infrastructure projects are specifically addressed by statute. (Section 7514.2.)
- ii. Diversification of investments.* (Section 31595(c).) The BOI is required to “diversify the investments of the system so as to minimize the risk of loss and to maximize the rate of return, unless under the circumstances it is clearly prudent not to do so.” (*Id.*) This same language appears in Article XVI, Section 17(d).

⁴ The responsibilities and authorities of the Audit Committee include oversight of Internal Audit, oversight of the CAE (see footnote 2), oversight of and recommendations regarding selection of the External Auditor, monitoring of the financial reporting process, monitoring management’s system of internal controls and compliance, and conflicts and ethics. These responsibilities are fully defined in the Audit Committee Charter approved by both Boards.

- iii. Delegation of investment authority. (Sections 31595, 31595.1, 31596.) The BOI has the authority and discretion to “invest, or delegate the authority to invest, the assets of the fund.” (Section 31595.) One party to whom the BOI may delegate authority is the treasurer. (Sections 31595.1, 31596.)
- iv. Actuarial investigations, assumptions, and valuations. (Sections 31453, 31453.6, 31454, 31454.1, 31515.1.) The BOI has sole authority under CERL over actuarial matters related to the pension fund. Actuarial issues are also recognized in the Constitution, which provides that board (as to LACERA, the BOI) “shall have the sole and exclusive power to provide for actuarial services in order to assure the competency of the assets of the public pension or retirement system.” (Article XVI, Section 17(e).)
- v. Retirement benefit funding policy. (Sections 7522.52, 31591.) The BOI sets the funding policy for LACERA, which includes the funding goal, annual implementation, allocation of actuarial assets, and the valuation cycle.
- vi. Recommendation of interest rates on deposits. (Sections 31453, 31454, 31472, 31591.) Based on actuarial investigation, valuation, and recommendations, the BOI recommends to the Board of Supervisors changes in the interest rate on deposits.
- vii. Recommendation of member contribution rates. (Sections 31453, 31454, 31621.11, 31625, 31639.26, 31872.) Based on actuarial input, the BOI recommends to the Board of Supervisors the rates of member contributions.
- viii. Recommendation of employer contribution rates and appropriations. (Sections 31453, 31453.5, 31454, 31454.5, 31495.) Similarly, the BOI recommends to the Board of Supervisors employer contributions rates and appropriations based on actuarial findings.
- ix. Transfer of excess interest. (Section 31592.2(a).) The BOI has authority, when the surplus interest in excess of the amount credited to contributions and reserves exceeds 1% of total assets, to transfer such surplus into a county advance reserve for the payment of benefits.
- x. Selection of custodian. (Section 31596.) The BOI is responsible to select LACERA’s custodian.

- xi. Investment, actuarial, custodial, and investment legal expenses. (Section 31596.1) The BOI manages expenses of investment, the fund's actuary, the custodian, and investment counsel, all of which are then charged against investment earnings or fund assets as the BOI determines.
- xii. Adopt BOI regulations. (Sections 31525, 31526(a).) The BOI is required to adopt board regulations providing for election of officers, their terms, meetings, and all other matters relating to the administrative procedure of the board.
- xiii. Interest on unpaid installments of death benefit. (Section 31784.) The BOI determines the rate at which interest is paid to a person who elects to receive a death benefit over time.
- xiv. Certain Plan E actions. (Sections 31488, 31491(f) and (g), 31492(b) and (c).) The interest and mortality tables adopted by the BOI are used for calculation of the early retirement adjustment factors that may be employed under Plan E. (Section 31491(f).) The BOI also adjusts primary insurance amounts for Plan E based on the advice of the actuary. (Section 31491(g).) In addition, the BOI approves the actuarial equivalence of a Plan E member's election for an increased survivor allowance. (Section 31492(c).)
- xv. Filling of BOI vacancies. (Section 31523.1.) The BOI is required to cause an election to be held at the earliest possible date for any vacancy in the elected positions.
- xvi. Separation from County service. (Section 31524.) Separation from County service of an elected member vacates the trustee's office.
- xvii. 24 hours of trustee education. (Section 31522.8.) BOI trustees are required to obtain 24 hours of education every two years on the subjects listed in Section 31522.8.
- xviii. Conflict and revolving door limits. (Section 31528.) Members of the BOI may not have a personal interest, direct or indirect, in the making of any investment, the profit or losses on any investments, or the sale of any investment, or act as agent for others in the use of trust funds. BOI members also may not, for a period of two years after leaving office, act as an agent or attorney for or otherwise represent for compensation any person, except the County, before the BOI, BOR, or staff by personal appearance or any oral or written communication for the purpose of influencing LACERA administrative or legislative

action or concerning a contract, grant, or purchase or sale of good or property. Beyond Section 31528, the BOI has authority to regulate conflicts that may arise in the conduct of its affairs and the matters under its authority.

- xix. Authority to obtain legal representation. (Sections 31529, 31529.1, 31529.5, 31529.6, 31529.9, 31607.) The BOI may retain outside counsel to act as counsel for the board or assist in the performance of its responsibilities.
- xx. Securities and investment-related litigation. Authorization and oversight of securities and other investment-related litigation is the responsibility of the BOI because the issues involve matters within the broad investment responsibility of that board.
- xxi. Issuance of subpoenas. (Section 31535.1) The BOI has the authority to issue subpoenas in connection with its areas of responsibility.
- xxii. OPEB trust investments and trust administration. (Sections 31694.1, 31694.3, 31694.5.) The BOI may invest Other Post-Employment Benefit (OPEB) trust assets contributed by participating employers. The BOI is trustee under the County, Court, and Master OPEB Trust Agreements with responsibility for trust investment and administration.
- xxiii. Approval of travel. The BOI has the responsibility under the Education and Travel Policy to approve travel for its trustees according to the terms of the policy.
- xxiv. Committees. Under the BOI Regulations, the BOI Chair may appoint such standing and ad hoc committees as he or she deems necessary to accomplish the BOI's responsibilities. The BOI as a whole also has authority to establish committees.

The BOI has the authority to perform and manage their specific responsibilities as listed above, adopt policies and procedures, retain other consultants and vendors, and take other reasonable and necessary actions related to their specifically assigned responsibilities. The BOI's authorities and responsibilities are further addressed in the BOI's Regulations (or Bylaws), Board Charter, Powers Reserved Defined, Powers Reserved and Delegated Authorities, the Powers and Duties of Investments Board Members, Investment Policy Statement, Corporate Governance Committee Charter, Corporate Governance Principles and Policy, Domestic Proxy Voting Guidelines, and other existing policies and procedures. The BOI must manage its meetings and affairs so as to comply with the Brown Act, Cal. Gov't Code 54950, *et seq.*

c. BOR Responsibilities and Authorities.

Under Section 31520, “the management of the retirement system is vested in the” BOR, except for those responsibilities specifically assigned to both Boards or the BOI. Accordingly, the short answer to the question of the BOR’s responsibilities and authorities is that the BOR separately can do anything, required under CERL, PEPRA, and the Constitution to manage the system, that is not specifically listed in paragraph 3(a) (joint BOR and BOI responsibilities) and paragraph 3(b) (BOI responsibilities). However, to provide a more helpful response, the responsibilities and authorities that may be separately exercised by the BOR include the following:

- i. Pension benefits administration upon service retirement.* (Section 31670.) The BOR approves all service retirements and administers all issues and processes under CERL and PEPRA related to delivery and support of pension benefits, including Member Services, Benefits, and Quality Assurance.
- ii. Compensation earnable and pensionable compensation.* (Sections 7522.34, 31461.) The BOR makes determinations as to whether pay codes are compensation earnable under CERL. The BOR also acts upon pensionable compensation recommendations under PEPRA, although there is less board discretion under PEPRA than there is under CERL because PEPRA does not specifically reference a board determination.
- iii. Disability retirement benefits administration.* (Sections 31530, 31720 *et seq.*) The BOR approves all disability retirements. In that role, the BOR administers Disability Retirement Services, engages physicians, manages the board’s medical advisor, decides applications, appoints referees to conduct appeal hearings, receives and acts upon referee reports, sets rules for disability applications and hearings, and makes such other decisions and performs such other oversight as required for delivery of disability retirement benefits. Member Services, Benefits, and Quality Assurance may also be necessary, from time to time, to support the administration of disability retirement.
- iv. All other benefits and benefit-related issues.* All other benefits and benefit-related issues under CERL and PEPRA, including, for example, survivor benefits, death benefits, investigation of benefits questions, felony forfeiture, and reciprocity, are within the BOR’s authority.

- v. Collections. The BOR oversees collection issues, including underpayment of contributions and overpayment of benefits.
- vi. Administrative appeals. The BOR has established and oversees an administrative appeals process, and hears and decides member appeals with regard to plan administration issues. The administrative appeals process adopted by the BOR provides due process to members with disputes.
- vii. Procedure for assessing and determining whether an element of compensation was paid to enhance benefits. (Section 31542.) The BOR is required to implement a procedure to address potential “pension spiking.” If the BOR determines that compensation was paid to enhance a member’s benefit, the member or employer may present evidence that the compensation was not paid for that purpose and request the BOR to reverse its decision. This requirement was implemented in part through the administrative appeals process described in (vi) above.
- viii. LACERA operations. All LACERA operational issues are addressed by the BOR, other than those assigned to the Boards jointly or to the BOI as described in the preceding sections of this memo. The BOR’s operational responsibilities are broad, except as limited, and include such important matters as privacy, Public Records Act requests, member communications, and all issues not specifically provided to be performed elsewhere.
- ix. Financial and accounting services. (Section 31593.) Aside from financial, actuarial, and auditing responsibilities of the BOI and the Audit Committee as explained above, the BOR monitors and supervises the Financial and Accounting Services Division and related financial reporting compliance issues and approves retention of LACERA’s external financial auditor based on a recommendation from the Audit Committee.
- x. Personnel issues. The personnel function, which includes Human Resources, is part of the management of the system, and is therefore under the jurisdiction of the Board of Retirement. Personnel issues includes employment claims and litigation. This responsibility excludes the CEO and the CAE, which report jointly to both Boards as noted above. It also excludes classification, compensation, and union contracts (although negotiations will be overseen by the BOR), which are joint board responsibilities. In addition, it is reasonable to

acknowledge that both Boards have an interest in significant personnel issues concerning senior management, such as the Chief Counsel, who regularly advise the BOR. Accordingly, while the BOR will have oversight responsibility for most personnel issues, certain personnel issues may appropriately be addressed by both Boards working together or by the BOI alone.

- x. Aids to benefits administration.* The BOR's broad authority over benefits, including service retirements, disability retirements, and other benefits, encompasses the ability to procure consultants and whatever other aids are necessary for the effective performance of that work.
- xii. Tax compliance issues.* The BOR oversees tax qualification issues and monitors that LACERA remains in compliance with applicable requirements of the Internal Revenue Code. The BOR also monitors compliance with other tax laws, such as state and federal withholding requirements for member and beneficiary payments.
- xiii. Adopt BOR regulations.* (Sections 31525, 31526.) The BOR is required to adopt board regulations providing for election of officers, their terms, meetings, and all other matters relating to the administrative procedure of the board.
- xiv. Filling of BOR vacancies.* (Section 31523.) The BOR is required to cause an election to be held at the earliest possible date for any vacancy in the elected positions.
- xv. Separation from County service.* (Section 31524.) Separation from County service of an elected member vacates the trustee's office.
- xvi. 24 hours of trustee education.* (Section 31522.8.) BOR trustees are required to obtain 24 hours of education every two years on the subjects listed in Section 31522.8.
- xvii. Conflict and revolving door limits.* (Section 31528.) Members of the BOR may not have a personal interest, direct or indirect, in the making of any investment, the profit or losses on any investments, or the sale of any investment, or act as agent for others in the use of trust funds. BOR members also may not, for a period of two years after leaving office, act as an agent or attorney for or otherwise represent for compensation any person, except the County, before the BOI, BOR, or staff by personal appearance or any oral or written communication for the purpose of influencing LACERA administrative or legislative action or concerning a contract, grant, or purchase or sale of goods or

property. Beyond Section 31528, the BOR has authority to regulate conflicts that may arise in the conduct of its affairs and the matters under its authority.

- xviii. Authority to obtain legal representation. (Sections 31529, 31529.1, 31529.5, 31529.6, 31529.9.) The BOR may retain outside counsel to act as counsel for the board or assist in the performance of its responsibilities.
- xix. Litigation related to LACERA benefits, operations, and management. All non-investment related litigation is managed by the BOR, with the possible exception that there may be limited, extraordinary situations where good governance and fiduciary duty suggests that the best case management will be performed by both Boards.
- xx. Issuance of subpoenas. (Section 31535.1) The BOR has the authority to issue subpoenas in connection with its areas of responsibility.
- xxi. Administration of the OPEB program. (Sections 31691, 31694.) The BOR administers the retiree healthcare program under the 1982 Agreement, as amended, with the County and under separate agreements with participating districts.
- xxii. Approval of travel. The BOR has the responsibility under the Education and Travel Policy to approve travel for its trustees according to the terms of the policy.
- xxiii. Committees. Under the BOR Regulations, the BOR Chair may appoint such standing and ad hoc committees as he or she deems necessary to accomplish the BOR's responsibilities. The BOR as a whole also has the authority to establish committees.

The BOR also has the authority to perform and manage their specific responsibilities as listed above, adopt policies and procedures, and take other reasonable and necessary actions related to their specifically assigned responsibilities. The BOR's authorities and responsibilities are further addressed in the BOR's Regulations, Board Charter, Committee Charters, the Power and Duties of Retirement Board Members, Policies and Procedures for Handling Disability Applications, Procedures for Disability Retirement Hearings, and other existing policies and procedures. The BOR must manage its meetings and affairs to comply with the Brown Act, Cal. Gov't Code 54950, *et seq.*

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CONCLUSION

This summary of the Boards' responsibilities is based on the current state of the law. It is also important to repeat that, while this memo is intended to be comprehensive, there may be specific responsibilities of the Boards that are not mentioned with particularity. To the extent there are ambiguities in the law or the Boards would like to change existing practice, LACERA can seek legislative changes. The Boards, separately or jointly depending on the subject matter, also have the discretion to adopt additional policies and procedures to clarify their respective responsibilities.

c:	Robert Hill	Vincent Lim	Leilani Ignacio
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To: Members of the Board of Retirement and Board of Investments
Los Angeles County Employees Retirement Association
c/o Steven P. Rice, Chief Counsel

Date: June 15, 2018

Subject: Boards' Responsibilities

It came to our attention yesterday that some members of the Boards had requested that we, as Fiduciary Counsel, provide an analysis of the law and policies establishing the respective responsibilities of the two Boards, separate and apart from the analysis presented to the Boards during the joint meeting held on April 4, 2018. This Memorandum addresses that request.

Chief Counsel submitted a Memorandum to the Boards, dated March 27, 2018, regarding the "Joint and Separate Responsibilities of the Boards," for the April 4th joint meeting (copy attached.) Prior to submitting that Memorandum, Chief Counsel afforded us an opportunity to review and comment on its content, which we did; our comments and suggestions were incorporated into the final Memorandum presented to the Boards. At the April 4, 2018 meeting, we accompanied Chief Counsel in presenting the Memorandum to the Boards and responding to Board member questions and comments. At the conclusion of the meeting counsel was directed to incorporate the Memorandum into the Board Charters.

Although not expressly stated in the Chief Counsel's Memorandum, we fully agree with the legal analysis and conclusions found in the Memorandum. The respective responsibilities of the two Boards are detailed extensively in the Memorandum, sourced to their statutory bases, and are consistent with the common law of trusts (particularly the law relating to the fiduciary obligations of co-trustees.) Where the law may not be crystal clear in its direction, the Boards have established reasonable policies and procedures to accommodate their respective duties and implement the intent of the law.

In sum, we believe that the March 27, 2018 Memorandum accurately states the current status of the law establishing the respective powers and duties of the Boards, and here confirm our agreement with its analysis and conclusions.

If we can provide further guidance to the Boards please let us know.

October 21, 2021

TO: Each Trustee
Board of Retirement

FROM: Barry W. Lew *BWL*
Legislative Affairs Officer

FOR: November 3, 2021 Board of Retirement Meeting

SUBJECT: **Board Officer Rotation Policy**

RECOMMENDATION

That the Board of Retirement approve the Board Officer Rotation Policy.

LEGAL AUTHORITY

Pursuant to Article XVI, Section 17 of the California Constitution, the Board of Retirement (BOR) has plenary authority and exclusive fiduciary responsibility for the administration of the system. The BOR may make policies related to the governance of its board operations.

Government Code Section 31525 provides that the BOR may make regulations that are not inconsistent with the County Employees Retirement Law of 1937 (CERL). The regulations become effective when approved by the Board of Supervisors.

The BOR Regulations provide that each January the BOR shall elect from its members a Chair, Vice Chair, and Secretary to serve for a term of one year or until his or her successor is duly elected and qualified.

Fiduciary counsel advised that the formulation of a new board policy is sufficient to implement a new process for the selection of board officers without amending the BOR Regulations.

BACKGROUND

The BOR Regulations provide for a Chair, Vice Chair, and Secretary to serve as officers of the Board. The current process to determine board officers provides for elections to be held at the BOR's first regular meeting in January with nominations submitted by any trustees during the board meeting.

At the BOR meeting on September 1, 2021 and at the Board of Investments (BOI) meeting on September 8, 2021, BOR Chair Alan J. Bernstein and BOI Chair Keith Knox, respectively, presented different options to potentially replace the current process of annual elections. Trustees from each board provided feedback on the various options.

The general consensus favored a seniority-based system to determine the selection of board officers.

At the BOR meeting on October 6, 2021 and at the BOI meeting on October 13, 2021, BOR Chair Alan J. Bernstein and BOI Chair Keith Knox, respectively, engaged in further discussions with the Boards for feedback on and approval of the key terms that would serve as a template and basis for creating a policy for a seniority-based system. The Chief Executive Officer and staff were directed to prepare a final policy for implementation prior to the selection of Board officers by January 2022.

DISCUSSION

The attached policy was formulated based on the feedback by the trustees on the key terms that would serve as a basis for this policy. In summary, the policy would encapsulate the following—

- For Appointed trustees, count the one-year gap between the trustee's consecutive appointments as service to determine seniority to provide a level of parity between Appointed and Elected trustees in their accrual of seniority. As such, the seniority list for each board officer position would be one list of all trustees rather than separate lists of Appointed and Elected trustees.
- No minimum service requirement for trustees to serve as officers.
- A trustee who is eligible to serve as an officer may opt out of serving an indefinite number of times with no loss of seniority.

During the formulation of the policy, staff encountered a few contingencies that were not discussed in the prior meetings but should be addressed by the policy. Based on staff's understanding of the BOR's feedback, the sentiment of the BOR in those prior meetings was that the policy should not mandate any trustee to serve as an officer; at the same time, the policy should not penalize any trustee for choosing not to serve. Moreover, the policy is intended to broaden the opportunities for trustees who wish to serve as officers.

In the spirit of the BOR's sentiment, the policy addresses the following contingencies—

- In case of a tie for years of service between trustees, the trustee who has served fewer times in the board officer position for which the seniority list is promulgated shall be higher in position on the list.
- Since Appointed trustees are to be credited with the one-year gap as service between consecutive appointments, the time that the Appointed trustee remains on the BOR after the expiration of his or her term because a successor has not been appointed yet is not counted for seniority.
- Consistent with the Trustee Travel Policy that mandates trustees to cease arranging future travel once they become aware their term of service will end, the

Board Officer Rotation Policy mandates that an Appointed trustee who remains on the BOR after the expiration of his or her term is not eligible to serve as an officer.

- In the event a vacancy occurs for a board officer position, a trustee with seniority is eligible to serve out the remaining term as a successor. However, a trustee who opts to serve as result of a vacancy shall not have his or her seniority reset to zero and may serve as an officer in this position the following year.

CONCLUSION

Staff requests that the BOR provide any additional comments or terms that may be incorporated into the policy as it considers approval of the policy.

IT IS THEREFORE RECOMMENDED THAT THE BOARD approve the Board Officer Rotation Policy.

Reviewed and Approved:



Santos H. Kreimann
Chief Executive Officer

Attachment

Board Officer Rotation Policy

cc: Santos H. Kreimann
Luis Lugo
JJ Popowich
Laura Guglielmo
Steven P. Rice

BOARD OF RETIREMENT BOARD OFFICER ROTATION POLICY

PURPOSE

The Board of Retirement (BOR) has three officers who provide leadership and facilitate the operations of the board as provided by the BOR Charter: Chair, Vice Chair, and Secretary. The BOR Regulations provide that each January the BOR shall elect a trustee to serve as an officer in each of these positions for a term of one year. This policy replaces the process of electing board officers by prescribing a seniority-based system to select board officers each January.

AUTHORITY

Pursuant to Article XVI, Section 17 of the California Constitution, the BOR has plenary authority and exclusive fiduciary responsibility for the administration of the system. As such, the BOR may make administrative policies related to the governance of its board operations.

DEFINITIONS

“Appointed” means appointed by the Board of Supervisors.

“Board Officer” means Chair, Vice Chair, or Secretary.

“Elected” means elected by the general, safety, or retired members of LACERA.

“Ex officio” means the Treasurer and Tax Collector.

“Opt out” means a trustee’s choice to not commence service as a board officer when eligible based on seniority.

“Seniority” means a trustee’s total accumulated service.

“Seniority list” means a list of appointed, elected, and ex officio trustees ordered by seniority from highest to lowest in each trustee’s years of service. In case of a tie for years of service between trustees, the trustee who has served fewer times in the board officer position for which the seniority list is promulgated shall be higher in position on the list.

“Service” means the trustee’s service while in office as a member of the BOR and includes all combinations of service in his or her capacity as an appointed, elected, or ex officio trustee, including interim ex officio service. Service for an appointed trustee includes the one year between consecutive appointments during which the trustee is not in service to the BOR. Service for an appointed trustee does not include the time he or she remains on the BOR after the expiration of his or her term because his or her successor has not

been appointed in time to take office in January. Service for an elected trustee does not include any breaks in elected service on the BOR.

STATEMENT OF POLICY

Seniority List

For each board officer position of Chair, Vice Chair, and Secretary, a separate seniority list shall be maintained.

The seniority list shall also include the alternate seventh and alternate retired trustees but not the alternate ex officio trustee.

Board Officer Selection

With reasonable and sufficient time before the first regular meeting in January, the Executive Board Assistant shall verify the seniority of each trustee on the list for each board officer position who would be in office during the calendar year commencing in January and ascertain in order of seniority which trustee opts to serve as a board officer for the upcoming year. There is no minimum service requirement for eligibility to serve as a board officer. A trustee may serve in only one board officer position during any year.

At the first regular meeting in January, the BOR shall hold a vote to ratify the slate of board officers determined by the Executive Board Assistant under this policy.

An appointed trustee whose term of service has ended but remains on the BOR because his or her successor has not been appointed in time to take office in January is not eligible to serve as a board officer.

A trustee who opts to serve as a board officer shall have his or her seniority reset to zero and begin accruing seniority anew.

Although the alternate seventh and alternate retired trustees may serve as board officers, they shall not vote on board matters unless their voting rights are invoked under the County Employees Retirement Law of 1937.

Opting Out

A trustee who is eligible to commence service as a board officer based on seniority may opt out of serving without loss of seniority. There is no limit to the number of times a trustee may opt out. A trustee who has seniority in more than one officer position and opts to serve in one position shall not be considered as having opted out of serving in the other position.

Vacancy

In the event of a vacancy in the office of Chair, Vice Chair, or Secretary, the seniority list for that board officer position will be used to determine which trustee is eligible to serve out the remaining term of office as a successor. The BOR shall vote to ratify the filling of

such vacancy at the next meeting following the vacancy. A trustee who opts to serve out the remaining term of office resulting from a vacancy shall not have his or her seniority reset to zero and, if eligible, may serve as an officer in this position the following year.

Adopted: _____

October 8, 2021

TO: Each Trustee
Board of Retirement

FROM: Barry W. Lew *BW*
Legislative Affairs Officer

FOR: November 3, 2021 Board of Retirement Meeting

SUBJECT: **PROVIDE VOTING DIRECTIONS ON SACRS 2022 LEGISLATIVE PROPOSALS**

RECOMMENDATION

That the Board of Retirement direct its voting delegate to vote YES on sponsorship by the State Association of County Retirement Systems (SACRS) of an omnibus bill for the SACRS 2022 legislative platform.

BACKGROUND

Each year, the 20 retirement systems operating under the County Employees Retirement Law of 1937 (CERL) are asked to submit proposals to the SACRS Legislative Committee for sponsorship in the annual SACRS legislative platform. The items submitted should have application to all CERL systems rather than an individual system; they should not propose new benefits that will be paid for by the plan sponsor; and they should not create major issues, such as conflicts with Proposition 162 or with any of the 19 other CERL retirement systems.

The proposal for the omnibus bill includes technical and clarifying amendments developed by the SACRS Legislative Committee as well as items submitted by individual CERL systems. The amendments had been circulated to the Chief Executive Officers of each CERL system for review and feedback. The SACRS Legislative Committee reviewed the feedback and included items that garnered broad agreement. The proposal will be presented to the SACRS membership for approval at the Business Meeting of the SACRS Fall Conference on November 12, 2021.

The Board of Retirement's (BOR) policy for SACRS business is that the Chief Executive Officer is the SACRS voting delegate with alternates being the BOR officers and the remaining trustees by board seat number.

DISCUSSION

Issue 1: 31452.7 – Beneficiaries Designating Estate

Current Law

Upon the death of a member after retirement or a survivor, the retirement allowance or survivor's allowance that was earned but not yet paid is paid to a designated beneficiary.

Proposed

The proposed amendment would allow a member or survivor to designate a corporation, trust, or estate as a beneficiary in addition to a natural person. This would allow an estate or trust to receive a member or survivor's last check upon death but not ongoing payments.

Issue 2: 31525 – Board of Retirement Regulations

Current Law

The retirement board may make regulations not inconsistent with CERL. The regulations become effective when approved by the board of supervisors.

Proposed

The proposed amendment would remove the requirement that the regulations must be approved by the board of supervisors. The requirement is a holdover from the period when county retirement systems were administered by a county department and predates the passage of Proposition 162, which gives plenary authority to retirement boards to administer their retirement systems. Retirement boards enact regulations to implement the statutes under their jurisdiction.

Issue 3: 31641.4 – Prior Military Reserve Service

Current Law

Members may receive service credit for service rendered in another public agency or for military service if they are not entitled to receive a pension from another agency based on that service. However, 10 U.S. Code Section 12736 provides that military service may not be excluded from a pension based on civilian employment even if that service is used to qualify for a military reservist retirement benefit.

Proposed

The case of *Cantwell v. County of San Mateo*, 631 F.2d 631 (9th Cir. 1980) determined that federal law superseded Government Code Section 31641.4 and that a member whose military reserve service is credited towards a military pension is also eligible to use that service for a county retirement pension. The proposed amendment would conform Section 31641.4 to the *Cantwell* decision.

Issue 4: 31646 – Uncompensated Leave of Absence for Illness; Parental Leave; Conditions

Current Law

A member who returns to active service following an uncompensated leave of absence due to illness may receive service credit for that period by paying the contributions and interest that would have paid and earned if the member had not been absent. Members are limited to 12 months of service credit for each period of absence.

A member who returns to active service following an uncompensated period of parental leave may receive service for that period by paying the contributions that the member and employer would have paid and the interest that would have been earned. Members are limited to 12 months of service credit for each period of absence. This provision is subject to adoption by the board of supervisors.

Proposed

The proposed amendment would include the types of leave covered under the Family Medical and Leave Act that are not due to the illness of the member. A member who returns to active service following this type of uncompensated period of leave may receive service for that period by paying the contributions that the member and employer would have paid and the interest that would have been earned. Members are limited to 12 months of service credit for each period of absence. This provision is subject to adoption by the board of supervisors.

Issue 5: 31646.XX – Furloughs

Current Law

CERL provides that a temporary layoff followed by reinstatement or re-employment within one year shall not be considered as breaking the continuity of service.

Proposed

The proposed amendment would add a new section providing that members subject to a temporary mandatory furlough are entitled to the same service credit and compensation earnable or pensionable compensation to which the members would have been entitled in the absence of the temporary mandatory furlough. The retirement board may condition additional member and employer contributions that are necessary to fund such benefits on an actuarially sound basis.

A temporary mandatory furlough is defined as a period not to exceed two years during which a member is directed to be absent from work without pay for up to one quarter of the member's normal working hours.

Issue 6: 31680.20 – Postretirement Employment

Current Law

Members retired from the California Public Employees' Retirement System may serve part-time on a state board or commission without reinstatement from retirement or loss or interruption of benefits.

Proposed

The amendment would clarify that members retired under a county retirement system may serve part-time on a state, county, city, district, or other political subdivision's board or commission without reinstatement from retirement or loss or interruption of benefits.

Issue 7: 31725.7, 31760 – Disability Retirement: Optional Allowances

Current Law

A member who applies for a disability retirement may, if eligible, apply for a service retirement pending the determination of the member's entitlement to disability retirement. If granted a disability retirement, the member may change the benefit option that the member selected for the service retirement benefit to apply to the disability retirement benefit. However, a member who retires for service and then applies for, and is granted, disability retirement is not entitled to change the benefit option.

Proposed

The proposed amendment would allow a member retired for service who is granted disability retirement to change the benefit option regardless of whether the member applied for disability retirement before or after retiring for service.

Issue 8: 31726 and 31726.5 – Nonservice-connected Disability

Current Law

General and safety members may be retired for nonservice-connected disability. The benefit formulas for nonservice-connected disability retirement distinguish between retiring before or after age 65 for general members and before or after age 55 for safety members.

Proposed

The proposed amendment does not make any substantive changes. It restructures the sections for more clarity and makes technical updates.

Issue 9: 31730 – Disability Reinstatement

Current Law

If the retirement board determines that a member retired for disability is no longer incapacitated and the member's employer offers to reinstate the member, the member's retirement allowance is canceled, and the member is reinstated into county service.

Proposed

The proposed amendment addresses the scenario in which the member is no longer incapacitated, but the employer does not offer reinstatement, by converting the disability retirement benefit into a service retirement benefit without adjusting the benefit. In the case of a service-connected disability retirement, for tax reporting purposes, a member would no longer be entitled to a tax exclusion equal to 50 percent of final compensation since the member is no longer incapacitated due to service-connected causes. The amendment conforms to the practice of several county retirement systems.

Issue 10: 31761, 31762, 31763, and 31764 – Optional Retirement Allowances

Current Law

A member may elect an optional settlement and designate a beneficiary that is a person having an insurable interest in the member's life to receive the benefit after the member's death.

Proposed

The proposed amendment would clarify that it is a "natural" person having an insurable interest in the member's life as opposed to a fictitious person.

Issue 11: 31781 – Death Benefit; Elements

Current Law

The basic death benefit consists of a member's accumulated contributions and an amount equal to one-twelfth of the member's annual compensation earnable or pensionable compensation multiplied by the number of completed years of service. The amount cannot exceed 50 percent of such annual compensation.

Proposed

The proposed amendment adds language consistent with the definition of compensation earnable to determine the computation when a member is on a leave of absence during the 12 months immediately preceding the member's death.

Issue 12: 31838.5 – Concurrent Retirement; Disability

Current Law

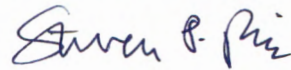
Reciprocal members who are eligible for disability retirement cannot receive a disability allowance, whether service-connected or nonservice-connected, that when combined with any amount from any other reciprocal system results in a disability allowance greater than the amount the member would have received had all the member's service been with only one system. Each system calculates the benefit based upon the member's service with that system and adjusts its payment on a pro rata basis.

Proposed

The proposed amendment would clarify that a CERL system shall reduce the benefit "as much as necessary" to avoid having the member receive a combined allowance that is greater than the amount the member would have received had all the member's service been with only one system. Non-CERL systems are not subject to Section 31838.5 and might not be making the appropriate reduction to prevent the member from receiving a windfall.

IT IS THEREFORE RECOMMENDED THAT THE BOARD direct its voting delegate to vote YES on sponsorship by the State Association of County Retirement Systems (SACRS) of an omnibus bill for the SACRS 2022 legislative platform.

Reviewed and Approved:



Steven P. Rice, Chief Counsel

Attachment

Recommendation to SACRS Board of Directors with Summary Matrix and Draft Bill Language

cc: Santos H. Kreimann
Luis Lugo
JJ Popowich
Laura Guglielmo
Steven P. Rice
Fern Billingsy
Ricki Contreras
Frank Boyd
Allan Cochran
Carlos Barrios
Joe Ackler, Ackler & Associates



September 20, 2021

RE: SACRS-Sponsored Legislation in 2022

Dear SACRS Board of Directors,

The SACRS Legislative Committee recommends that SACRS sponsor legislation in 2022 to amend various sections of the County Employees' Retirement Law of 1937 (CERL).

At its September 17, 2021 meeting, the Legislative Committee approved bill language for a CERL Omnibus Bill and recommended approval by the SACRS Board of Directors. If approved by the SACRS membership at the Fall Conference, the bill language can be introduced in January 2022 for consideration during the 2022 legislative session.

The enclosed language reflects the work of Legislative Committee members, in collaboration with system administrators, over the past year to develop non-controversial, technical, and clarifying amendments to the CERL.

A summary matrix and draft bill language are attached.

If you have questions or would like to provide additional feedback, please contact us at dnelsen@acera.org or sterne@sacounty.net.

Respectfully,

/s/

David Nelsen and Eric Stern
Co-Chairs, Legislative Committee

ATTACHMENTS

- Summary Matrix
- Draft Bill Language

2022 CERL Clean-Up Bill

Issue	Gov Code	Topic	Issue/Justification
1	31452.7	Beneficiaries - Designating Estate	This amendment would allow a member to designate a corporation, trust, or estate to receive his or her last check upon death. This does not allow an estate or trust to receive ongoing payments. Note: Members who choose Option 1 already can designate an estate to receive the balance of contributions.
2	31525	Board of Supervisor approval of Board of Retirement regulations	This amendment would delete the requirement that Board of Retirement regulations must be approved by the Board of Supervisors. This language is a holdover from when CERL systems were managed by a county department, and was adopted prior to the passage on Prop.162 in 1992. Adoption of regulations is part of the BOR's duty to administer the system.
3	31641.4	Prior Service -- Military Reserve Service	This amendment would note a potential federal pre-emption issue regarding purchasing prior military reserve service. Current statute establishes that prior service purchases from another public agency must not yield a pension from that agency. However, 10 U.S.C. § 12736 provides that a period of military service may not be excluded from credit towards a civilian employment pension just because that period also counts towards reservist retirement. Thus, the question arises which statute prevails in a conflict between 10 U.S.C. § 12736 and Section 31641.4. The Ninth Circuit Court of Appeal considered that question in <i>Cantwell v. San Mateo County</i> , 631 F.2d 631 (9th Cir. 1980), and determined that federal law overrides Section 31641.4.
4	31646	Service Purchase for FMLA Leave	This amendment would include all leaves that are covered under the FMLA that are not due to the illness of the member.
5	31646.XX	Furloughs	This amendment would provide boards with authority to prevent temporary mandatory furloughs from impacting member benefits under specified circumstances. Similar to CalPERS statutes (see GC 20968, 20969, 20969.1, 20969.2), but granting more discretion to boards, this proposed new code section may help avoid inequities that can arise because of the timing of temporary mandatory furloughs in relation to members' planned retirements.

6	31680.2	Post-Retirement Employment	This amendment would add clarifying language that nonsalaried positions and per diems do not count as double dipping for members appointed to boards and commissions under purview of a participating employer of a county system; similar to language of 7522.57 for state boards and commission.
7	31725.7 31760	Disability Retirement: Optional Allowances	This amendment would allow members to change optional allowance if subsequently granted disability retirement, regardless of when the member filed a Disability Retirement application. Currently, Section 31725.7 only allows a benefit option change for members who retired for service after filing a disability retirement application but does not provide the same ability for those who retired for service before filing an application, even though both members may subsequently be granted a disability retirement.
8	31726 31726.5	Nonservice-connected disability	This amendment restructures the sections to provide more clarity; no substantive changes. The sections on the nonservice-connected disability retirement benefit formula distinguish between those retiring on or after age 65 for general and on or after age 55 for safety versus those retiring under these ages in the same section: 31726 and 31726.5.
9	31730	Disability -- Reinstatement	This amendment addresses the scenario in which an employer does not offer to take the employee back who has been found to no longer be incapacitated. The proposed amendment would convert convert the disability retirement into service retirement without adjusting benefit (i.e. actuarial reduction). This conforms to existing practice of several systems. Note: Similar to GC 21193 in which CalPERS only reinstates if the local employer offers to take the employee back.
10	31761 31762 31763 31764	Beneficiary Designation	This amendment would insert the word "natural" in front of the phrase "person having an insurable interest in his or her life" to clarify that the optional retirement settlement death benefit cannot be paid to a fictitious person such as a trust or corporation.
11	31781	Lump Sum Death Benefit	This amendment would add language consistent with other CERL sections that provide direction on the calculation of compensation earnable and pensionable compensation when the member is on a leave of absence during the 12 months immediately preceding the member's death.

12	31838.5	Concurrent Retirement: Disability	<p>Section 31838.5 prevents windfalls for members who retire for disability from one or more systems. This amendment would clarify that a CERL system must reduce a member's allowance from that system as much as necessary so that the member does not receive a combined allowance that is "greater than the amount the member would have received had all the member's service been with only one entity." The statute currently refers to a pro rata reduction by each system, but some systems (like CalPERS) are not subject to section 31838.5 and do not make any reduction. This may leave the member with the windfall that section 31838.5 is designed to prevent, depending upon how a system calculates its "pro rata" reduction. This statute would make clear that the windfalls section 31838.5 is designed to prevent should always be prevented.</p>
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CERL Clean-Up Bill 2022: Draft Language

Issue 1: 31452.7 – Beneficiaries Designating Estate

This amendment would allow a member to designate a corporation, trust, or estate to receive his or her last check upon death. This does not allow an estate or trust to receive ongoing payments. Note: Members who choose Option 1 already can designate an estate to receive the balance of contributions.

Section 31452.7 of the Government Code is amended to read:

(a) Upon the death of any member after retirement, any retirement allowance earned but not yet paid to the member shall, notwithstanding any other provision of law, be paid to the member's designated beneficiary.

(b) Upon the death of any person receiving a survivor's allowance under this chapter, any allowance earned but not yet paid to the survivor shall, notwithstanding any other provision of law, be paid to the survivor's designated beneficiary.

(c) For purposes of this section, "beneficiary" includes, but is not limited to, a corporation, a trust, or an estate.

Issue 2: 31525 – BOR Regulations

This amendment would delete the requirement that Board of Retirement regulations must be approved by the Board of Supervisors. This language is a holdover from when CERL systems were managed by a county department, and was adopted prior to the passage on Prop. 162 in 1992. Adoption of regulations is part of the BOR's duty to administer the system.

Section 31525 of the Government Code is amended to read:

The board may make regulations not inconsistent with this chapter, **the Public Employees' Pension Reform Act of 2013, The California Pension Protection Act of 1992, and any other provisions of law applicable to county retirement systems.**

~~The regulations become effective when approved by the board of supervisors.~~

Issue 3: 31641.4 -- Prior Military Reserve Service

This amendment would note a potential federal pre-emption issue regarding purchasing prior military reserve service. Current statute establishes that prior service purchases from another public agency must not yield a pension from that agency. However, 10 U.S.C. § 12736 provides that a period of military service may not be excluded from credit towards a civilian employment pension just because that period also counts towards reservist retirement. Thus, the question arises which statute prevails in a

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conflict between 10 U.S.C. § 12736 and Section 31641.4. The Ninth Circuit Court of Appeal considered that question in Cantwell v. San Mateo County, 631 F.2d 631 (9th Cir. 1980), and determined that federal law overrides Section 31641.4.

Section 31641.4 of the Government Code is amended to read:

A member shall receive credit for employment in public service only for such service as he is not entitled to receive a pension or retirement allowance from such public agency. The service for which he elects to contribute and the fact that no pension or retirement allowance will accrue to such member by virtue of his employment in such public agency must be certified to by an officer of the public agency where he rendered such public service or must be established to the satisfaction of the board. **Nothing in this paragraph prohibits a member from receiving credit for a period of federal public service where federal law expressly permits such credit even though the member is already entitled to receive a pension or retirement allowance from that service (Cantwell v. San Mateo County, 631 F.2d 631 (9th Cir. 1980)).**

Issue 4: 31646 – Credit for Uncompensated Leave of Absence for Illness; Parental Leave; Conditions

This amendment would include all leaves that are covered under the FMLA that are not due to the illness of the member.

Section 31646 of the Government Code is amended to read:

(a) A member who returns to active service following an uncompensated leave of absence on account of illness may receive service credit for the period of the absence upon the payment of the contributions that the member would have paid during that period, together with the interest that the contributions would have earned had they been on deposit, if the member was not absent. The contributions may be paid in a lump sum or may be paid on a monthly basis for a period of not more than the length of the period for which service credit is claimed. Credit shall not be received for any period of such an absence in excess of 12 consecutive months.

(b) (1) A member who returns to active service following an uncompensated leave of absence on account of parental leave may receive service credit for the period of the absence upon the payment of the contributions that the member and the employer would have paid during that period, together with the interest that the contributions would have earned had they been on deposit, if the member was not absent. For purposes of this subdivision, parental leave is defined as any time, up to one year, during which a member is granted an approved maternity or paternity leave and returns to employment at the end of the approved leave for a period of time at least equal to that leave. The contributions may be paid in a lump sum or may be paid on a monthly basis for a period of not more than the length of the period for which service credit is

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claimed. Credit shall not be received for any period of such an absence in excess of 12 consecutive months.

(2) This subdivision shall not be operative until the board of supervisors, by resolution adopted by majority vote, makes the provisions applicable to that county and applies it to parental leave that commences after the adoption by the board of supervisors.

(c) (1) A member who returns to active service following an uncompensated leave of absence on account of the serious illness of a family member when the absence is eligible for coverage under the Family Medical Leave Act, 29 U.S.C. section 2601 et. seq., or the California Family Rights Act, Government Code section 12945 et. seq., may receive service credit for the period of the absence upon the payment of the contributions that the member and the employer would have paid during that period, together with the interest that the contributions would have earned had they been on deposit, if the member was not absent. For purposes of this subdivision, leave on account of illness of a family member is defined as any time, up to one year, during which a member is granted an approved leave to care for a seriously ill family member and returns to employment at the end of the approved leave for a period of time at least equal to that leave. The contributions may be paid in a lump sum or may be paid on a monthly basis for a period of not more than the length of the period for which service credit is claimed. Credit shall not be received for any period of such an absence in excess of 12 consecutive months.

(2) This subdivision shall not be operative until the board of supervisors, by resolution adopted by majority vote, makes the provisions applicable to that county and applies it to leave that commences after the adoption by the board of supervisors.

Issue 5: 31646.XX – Furloughs

This amendment would provide boards with authority to prevent temporary mandatory furloughs from impacting member benefits under specified circumstances. Similar to CalPERS statutes (see GC 20968, 20969, 20969.1, 20969.2), but granting more discretion to boards, this proposed new code section may help avoid inequities that can arise because of the timing of temporary mandatory furloughs in relation to members' planned retirements.

Section 31646.XX of the Government Code is added to read:

The board may grant members who are subject to a temporary mandatory furlough the same service credit and “compensation earnable” or “pensionable compensation” to which the members would have been entitled in the absence of the temporary mandatory furlough. The board may condition such grant on the receipt of additional member and/or employer contributions that the board

determines are necessary to fund any benefits granted under this section on an actuarially sound basis.

For the purposes of this section, a “temporary mandatory furlough” refers to time during which a member is directed to be absent from work without pay for up to one quarter of the member’s normal working hours, with such reduced working hours in place for no longer than two years.

Issue 6: 31680.20 – Postretirement Employment

This amendment would add clarifying language that nonsalaried positions and per diems do not count as double dipping for members appointed to boards and commissions under purview of a participating employer of a county system; similar to language of 7522.57 for state boards and commission.

Section 31680.20 of the Government Code is added to read:

A person who is retired under this chapter may serve without reinstatement from retirement or loss or interruption of benefits under this chapter or the Public Employees’ Pension Reform Act of 2013 provided the service is on a part-time state, county, city, district, or other political subdivision board or commission. A retired person whose employment without reinstatement is authorized by this subdivision shall acquire no benefits, service credit, or retirement rights with respect to the employment. Part-time service is limited to less than 20 hours per week, and salary or stipend of the part-time service may not exceed \$60,000 annually.

Issue 7: 31725.7, 31760 – Disability Retirement: Optional Allowances

This amendment would allow members to change optional allowance if subsequently granted disability retirement, regardless of when the member filed a Disability Retirement application. Currently, Section 31725.7 only allows a benefit option change for members who retired for service after filing a disability retirement application but does not provide the same ability for those who retired for service before filing an application, even though both members may subsequently be granted a disability retirement.

Section 31725.7 of the Government Code is amended to read:

(a) At any time after filing an application for disability retirement with the board, the member may, if eligible, apply for, and the board in its discretion may grant, a service retirement allowance pending the determination of his or her entitlement to disability retirement. If he or she is found to be eligible for disability retirement, appropriate

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adjustments shall be made in his or her retirement allowance retroactive to the effective date of his or her disability retirement as provided in Section 31724.

(b) Notwithstanding subdivision (a), this section shall also apply to a member retired for service who subsequently files an application for disability retirement with the board. If he or she is found to be eligible for disability retirement, appropriate adjustments shall be made in his or her retirement allowance retroactive to the effective date of his or her disability retirement as provided in Section 31724.

~~(b)~~(c) This section shall not be construed to authorize a member to receive more than one type of retirement allowance for the same period of time nor to entitle any beneficiary to receive benefits which the beneficiary would not otherwise have been entitled to receive under the type of retirement which the member is finally determined to have been entitled. In the event a member retired for service is found not to be entitled to disability retirement he or she shall not be entitled to return to his or her job as provided in Section 31725.

~~(c)~~(d) If the retired member should die before a final determination is made concerning entitlement to disability retirement, the rights of the beneficiary shall be as selected by the member at the time of retirement for service. The optional or unmodified type of allowance selected by the member at the time of retirement for service shall also be binding as to the type of allowance the member receives if the member is awarded a disability retirement.

~~(d)~~(e) Notwithstanding subdivision ~~(c)~~(d), if the retired member should die before a final determination is made concerning entitlement to disability retirement, the rights of the beneficiary may be as selected by the member at the time of retirement for service, or as if the member had selected an unmodified allowance. The optional or unmodified type of allowance selected by the member at the time of retirement for service shall not be binding as to the type of allowance the member receives if the member is awarded a disability retirement. A change to the optional or unmodified type of allowance shall be made only at the time a member is awarded a disability retirement and the change shall be retroactive to the service retirement date and benefits previously paid shall be adjusted. If a change to the optional or unmodified type of allowance is not made, the benefit shall be adjusted to reflect the differences in retirement benefits previously received. This paragraph shall only apply to members who retire on or after January 1, 1999.

Section 31760 of the Government Code is amended to read:

(a) Except as provided in subdivisions **(b) and (c)**, until the first payment of any retirement allowance is made, a member or retired member, in lieu of the retirement allowance for the member's life alone, may elect to have the actuarial equivalent of his or her retirement allowance as of the date of retirement applied to a lesser retirement

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allowance payable throughout life in accordance with one of the optional settlements specified in this article.

(b) Notwithstanding subdivision (a), a member who applies for disability and is subsequently granted a service retirement pending a determination of entitlement to disability may change the type of optional or unmodified allowance that he or she elected at the time the service retirement was granted, subject to the provisions of Section 31725.7.

(c) Notwithstanding subdivision (a), a member retired for service who applies for and is subsequently granted a disability retirement may change the type of optional or unmodified allowance that he or she elected at the time the service retirement was granted, subject to the provisions of Section 31725.7.

Issue 8: Sections 31726 and 31726.5: Nonservice-connected disability

This amendment restructures the sections to provide more clarity; no substantive changes. The sections on the nonservice-connected disability retirement benefit formula distinguish between those retiring on or after age 65 for general and on or after age 55 for safety versus those retiring under these ages in the same section: 31726 and 31726.5.

Section 31726 of the Government Code is amended to read:

(a) Upon retirement for ~~non-service~~**nonservice**-connected disability a member who has attained age 65 shall receive his or her service retirement allowance.

(b) Every member under age 65 who is retired for ~~non-service~~**nonservice**-connected disability and who is not simultaneously retired as a member on deferred retirement of the ~~State~~**Public** Employees' Retirement System or a retirement system established under this chapter in another county shall receive a disability retirement allowance which shall be the greater of the following:

~~(a)~~(1) The sum to which he or she would be entitled as service retirement; **or**

~~(b)~~(2) A sum which shall consist of ~~any of the following~~:

~~(1)~~(A) An annuity which is the actuarial equivalent of his or her accumulated contributions at the time of his or her retirement.

~~(2)~~(B) If, in the opinion of the board, his or her disability is not due to intemperate use of alcoholic liquor or drugs, willful misconduct, or violation of law on his or her part, a disability retirement pension purchased by contributions of the county or district.

~~(3)~~(C) If, in the opinion of the board, his or her disability is not due to conviction of a felony or criminal activity which caused or resulted in the member's disability, a disability retirement pension purchased by contributions of the county or district. This paragraph

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shall only apply to a person who becomes a member of the system on or after January 1, 1988.

Section 31726.5 of the Government Code is amended to read:

- (a) Upon retirement for nonservice-connected disability a safety member who has attained age 55 shall receive his or her service retirement allowance.
- (b) Every safety member under age 55 who is retired for nonservice-connected disability and who is not simultaneously retired as a member on deferred retirement of the Public Employees' Retirement System or a retirement system established under this chapter in another county shall receive a disability retirement allowance which shall be the greater of:
 - ~~(a)~~(1) The sum to which he or she would be entitled to as service retirement; or
 - ~~(b)~~(2) A sum which shall consist of:
 - ~~(1)~~(A) An annuity which is the actuarial equivalent of his or her accumulated contributions at the time of his or her retirement.
 - ~~(2)~~(B) If, in the opinion of the board, his or her disability is not due to intemperate use of alcoholic liquor or drugs, willful misconduct, or violation of law on his or her part, a disability retirement pension purchased by contributions of the county or district.
 - ~~(3)~~(C) If, in the opinion of the board, his or her disability is not due to conviction of a felony or criminal activity which caused or resulted in the member's disability, a disability retirement pension purchased by contributions of the county or district.

~~Paragraph 3~~**Subparagraph (C)** shall only apply to a person who becomes a member of the association on or after January 1, 1988.

Issue 9: 31730 – Disability Reinstatement

This amendment addresses the scenario in which an employer does not offer to take the employee back who has been found to no longer be incapacitated. The proposed amendment would convert convert the disability retirement into service retirement without adjusting benefit (i.e. actuarial reduction). This conforms to existing practice of several systems. Note: Similar to GC 21193 in which CalPERS only reinstates if the local employer offers to take the employee back.

Section 31730 of the Government Code is amended to read as follows:

- (a) If the board determines that the beneficiary is not incapacitated, and his or her employer offers to reinstate that beneficiary, his or her retirement allowance shall be

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canceled forthwith, and he or she shall be reinstated in the county service pursuant to the regulations of the county or district for reemployment of personnel.

(b) If the board determines that the beneficiary is not incapacitated, and his or her employer does not offer to reinstate that beneficiary, notwithstanding any requirement of this chapter regarding eligibility therefor, his or her retirement allowance shall be reclassified to a service retirement in the same amount and subject to any applicable future cost of living adjustments. The optional or unmodified type of allowance selected by the beneficiary at the time of retirement for disability shall be binding as to the service retirement.

Issue 10: 31761, 31762, 31763, and 31764 – Optional Retirement Allowances:

This amendment would insert the word “natural” in front of the phrase “person having an insurable interest in his or her life” to clarify that the optional retirement settlement death benefit cannot be paid to a fictitious person such as a trust or corporation.

Sections 31761, 31762, 31763, and 31764 of the Government Code are amended to read:

31761 – Optional settlement 1 consists of the right to elect in writing to have a retirement allowance paid him or her until his or her death and, if he or she dies before he or she receives in annuity payments the amount of his or her accumulated contributions at retirement, to have the balance at death paid to his or her estate or to the **natural** person, having an insurable interest in his or her life, as he or she nominates by written designation duly executed and filed with the board.

31762 – Optional settlement 2 consists of the right to elect in writing to have a retirement allowance paid to him or her until his or her death, and thereafter to the **natural** person, having an insurable interest in his or her life, as he or she nominates by written designation duly executed and filed with the board at the time of his or her retirement.

31763 – Optional settlement 3 consists of the right to elect in writing to have a retirement allowance paid him or her until his or her death, and thereafter to have one-half of his or her retirement allowance paid to the **natural** person, having an insurable interest in his or her life, as he or she nominates by written designation duly executed and filed with the board at the time of his or her retirement.

31764 – Optional settlement 4 consists of the right to elect in writing to have a retirement allowance paid him or her until his or her death and thereafter to have other benefits as are approved by the board, upon the advice of the actuary, continued throughout the life of and paid to the **natural** persons, having an insurable interest in his or her life, as he or she nominates by written designation duly executed and filed with the board at the time of his or her retirement. The designation shall not, in the opinion of the board and the actuary, place any additional burden upon the retirement system.

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CERL Clean-Up Bill 2022: Draft Language

Issue 11: 31781 – Death Benefit; Elements

This amendment would add language consistent with other CERL sections that provide direction on the calculation of compensation earnable and pensionable compensation when the member is on a leave of absence during the 12 months immediately preceding the member's death.

Section 31781 of the Government Code is amended to read:

The death benefit shall consist of:

- (a) The member's accumulated contributions.
- (b) An amount, provided from contributions by the county or district, equal to one-twelfth of the annual compensation earnable or pensionable compensation as defined in [Section 7522.34](#), whichever is applicable, by the deceased during the 12 months immediately preceding his death, multiplied by the number of completed years of service under the system, but not to exceed 50 percent of such annual compensation. **The computation for any absence shall be based on the compensation of the position held by the member at the beginning of the absence.**

Issue 12: 31838.5 – Concurrent Retirement; Disability

Section 31838.5 prevents windfalls for members who retire for disability from one or more systems. This amendment would clarify that a CERL system must reduce a member's allowance from that system as much as necessary so that the member does not receive a combined allowance that is "greater than the amount the member would have received had all the member's service been with only one entity." The statute currently refers to a pro rata reduction by each system, but some systems (like CalPERS) are not subject to section 31838.5 and do not make any reduction. This may leave the member with the windfall that section 31838.5 is designed to prevent, depending upon how a system calculates its "pro rata" reduction. This statute would make clear that the windfalls section 31838.5 is designed to prevent should always be prevented.

Section 31838.5 of the Government Code is amended to read:

No provision of this chapter shall be construed to authorize any member, credited with service in more than one entity and who is eligible for a disability allowance, whether service connected or nonservice connected to receive an amount from one county that, when combined with any amount from other counties or the Public Employees' Retirement System, results in a disability allowance greater than the amount the member would have received had all the member's service been with only one entity.

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In cases of service-connected disability allowances only, the limitation on disability allowances provided for in this section shall apply to service-connected disability allowances payable to those who, after being employed with another county or an entity within the Public Employees' Retirement System, become employed by a second public entity on or after January 1, 1984.

Each entity shall calculate its respective obligations based upon the member's service with that entity and each shall adjust its payment on a pro rata basis. **If, however, another entity does not reduce the amount it pays the member, an entity subject to this section shall reduce the allowance it pays the member by as much as necessary to ensure that the member does not receive a disability allowance greater than the amount the member would have received had all the member's service been with only one entity.**

FOR INFORMATION ONLY

October 20, 2021

TO: Each Trustee
Board of RetirementFROM: Ricki Contreras, Division Manager 
Disability Retirement Services

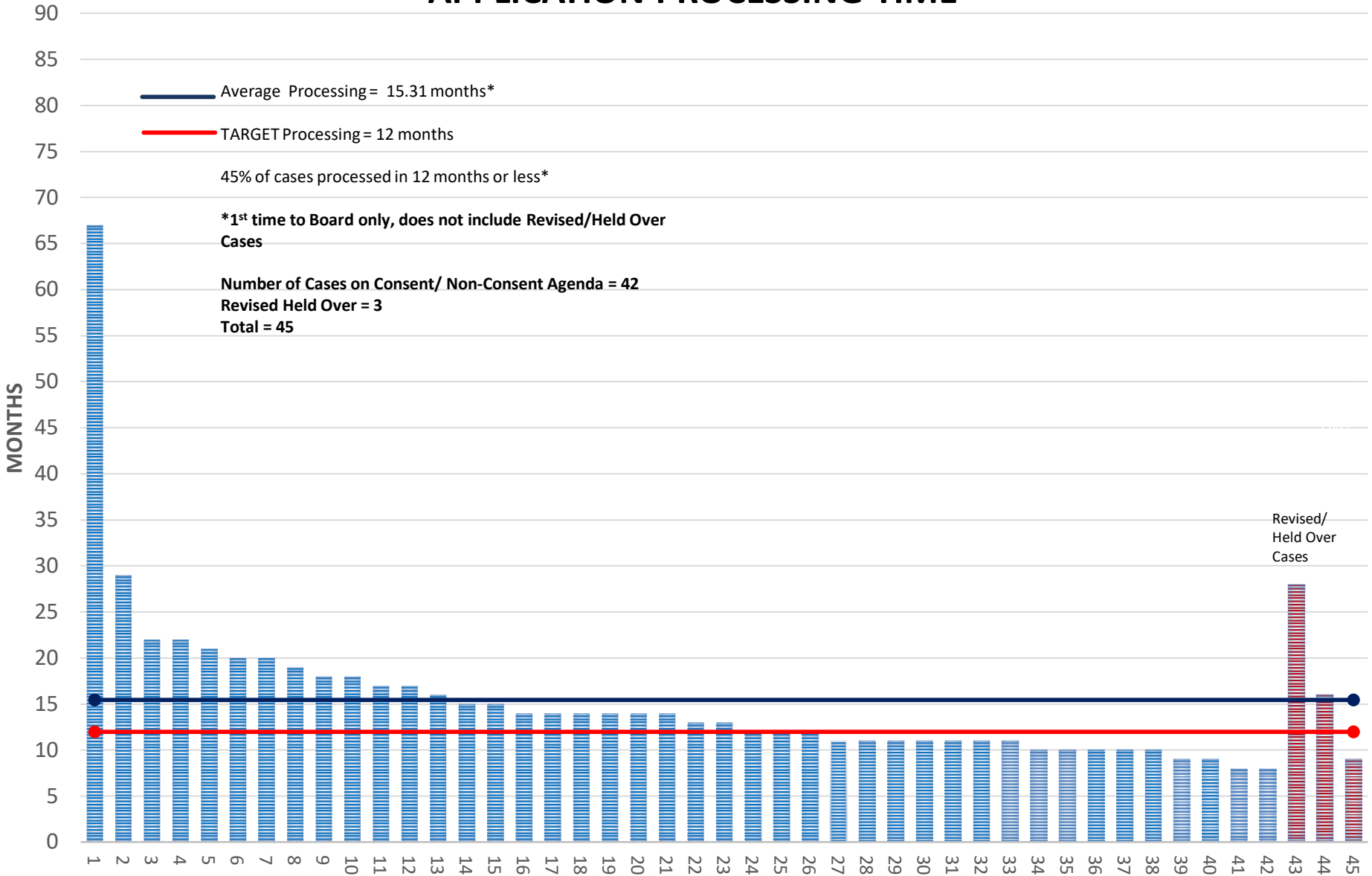
FOR: November 3, 2021, Board of Retirement Meeting

SUBJECT: **Application Processing Time Snapshot Reports**

The following chart shows the total processing time from receipt of the application to the first Board action for all cases on the November 3, 2021, Disability Retirement Applications Agenda.

Consent & Non-Consent Calendar			
Number of Applications	42		
Average Processing Time (in Months)	15.31		
Revised/Held Over Calendar			
Number of Applications	3		
Processing Time Per Case (in Months)	Case 1 28	Case 2 16	Case 3 9
Total Average Processing Time All <u>45</u> Cases on Agenda			
15.47			

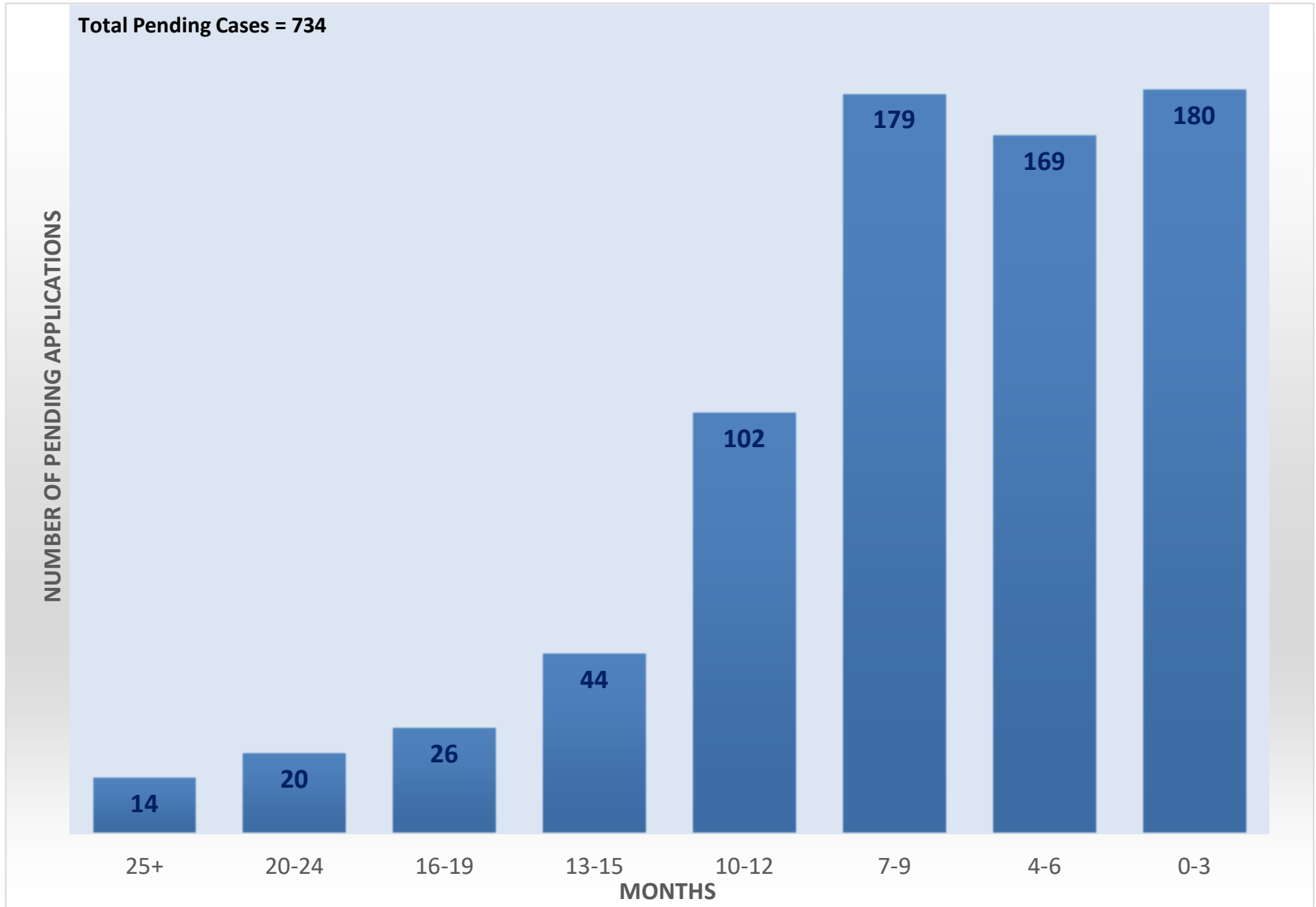
DISABILITY RETIREMENT SERVICES APPLICATION PROCESSING TIME



As of October 20, 2021

NOVEMBER 3, 2021 AGENDA

DISABILITY RETIREMENT SERVICES PENDING APPLICATIONS/TIME INTERVALS



As of October 20, 2021

**FOR INFORMATION ONLY**

October 20, 2021

TO: Each Trustee
Board of Retirement
Board of Investments

FROM: Ted Granger 
Interim Chief Financial Officer

FOR: November 3, 2021 Board of Retirement Meeting
November 17, 2021 Board of Investments Meeting

SUBJECT: **MONTHLY TRAVEL & EDUCATION REPORT – SEPTEMBER 2021**

Attached, for your review, is the Trustee Travel & Education Report. This report includes all events (i.e., attended and canceled) from the beginning of the fiscal year through September 2021. Staff travel and education is not included in this report and will be reported to the Chief Executive Officer separately.

REVIEWED AND APPROVED:



Santos H. Kreimann
Chief Executive Officer

TG/EW/krh

Attachments

c: L. Lugo
J. Popowich
L. Guglielmo
J. Gabel
S. Rice
J. Beasley

**TRUSTEE TRAVEL AND EDUCATION REPORT
FOR FISCAL YEAR 2021 - 2022
SEPTEMBER 2021**

Attendee	Purpose of Travel - Location	Event Dates	Travel Status
Alan Bernstein			
A	1 Edu - NCPERS 2021 Public Pension Funding Forum - New York, NY	08/22/2021 - 08/24/2021	Attended
Vivian Gray			
A	1 Edu - NCPERS 2021 Public Pension Funding Forum - New York, NY	08/22/2021 - 08/24/2021	Attended
V	- Edu - Congressional Black Caucus Foundation - VIRTUAL	09/12/2021 - 09/17/2021	Attended
	- Edu - Private Credit Outlook: Key Trends and the Road Ahead - VIRTUAL	09/16/2021 - 09/16/2021	Attended
	- Edu - NASP 32nd Annual Financial Services Virtual Conference - VIRTUAL	09/22/2021 - 09/24/2021	Attended
David Green			
X	- Edu - 2021 CII Fall Conference - Chicago, IL	09/22/2021 - 09/24/2021	Host Canceled
Patrick Jones			
V	- Edu -SACRS Public Pension Investment Management Program - VIRTUAL	07/13/2021 - 07/22/2021	Attended
X	- Edu - Duke University Executive Education Program - Corporate Social Responsibility - Durham, NC	09/23/2021 - 09/25/2021	Host Canceled
Joseph Kelly			
V	- Edu -SACRS Public Pension Investment Management Program - VIRTUAL	07/13/2021 - 07/22/2021	Attended
	- Edu - Private Credit Outlook: Key Trends and the Road Ahead - VIRTUAL	09/16/2021 - 09/16/2021	Attended
	- Edu - Pugh Capital 30th Anniversary Virtual Event Series - VIRTUAL	09/22/2021 - 09/22/2021	Attended
Keith Knox			
V	- Edu - Harvard Business School Audit Committees In A New Era of Governance - VIRTUAL	07/21/2021 - 07/23/2021	Attended
	- Edu - Pugh Capital 30th Anniversary Virtual Event Series - VIRTUAL	09/22/2021 - 09/22/2021	Attended
Gina Sanchez			
V	- Edu - 2021 CII Fall Conference - VIRTUAL	09/22/2021 - 09/24/2021	Attended
X	- Edu - 2021 CII Fall Conference - Chicago, IL	09/22/2021 - 09/24/2021	Host Canceled
Herman Santos			
A	1 Edu - NCPERS 2021 Public Pension Funding Forum - New York, NY	08/22/2021 - 08/24/2021	Attended
V	- Edu - PPI Roundtable - July 2021 - VIRTUAL	07/13/2021 - 07/15/2021	Attended
	- Edu - Private Credit Outlook: Key Trends and the Road Ahead - VIRTUAL	09/16/2021 - 09/16/2021	Attended

Category Legend:

A - Pre-Approved/Board Approved

B - Educational Conferences and Administrative Meetings in CA where total cost is no more than \$2,000 per Trustee Travel Policy; Section III.A

C - Second of two conferences and/or meetings counted as one conference per Trustee Education Policy Section IV.C.2 and Trustee Travel Policy Section IV.

V - Virtual Event

X - Canceled events for which expenses have been incurred.

Z - Trip was Canceled - Balance of \$0.00



Documents not attached are exempt from disclosure under the California Public Records Act and other legal authority.

**For further information, contact:
LACERA
Attention: Public Records Act Requests
300 N. Lake Ave., Suite 620
Pasadena, CA 91101**



Documents not attached are exempt from disclosure under the California Public Records Act and other legal authority.

**For further information, contact:
LACERA
Attention: Public Records Act Requests
300 N. Lake Ave., Suite 620
Pasadena, CA 91101**



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