

VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

BOARD OF RETIREMENT

FINANCE COMMITTEE MEETING

AUGUST 21, 2023

AGENDA

PLACE: Ventura County Employees' Retirement Association
Second Floor, Boardroom
1190 S. Victoria Avenue, Suite 200
Ventura, CA 93003

The public may listen to the Public Session and offer comments by calling: +1 669-219-2599, using Meeting ID: 840-1666-5401. Persons may also submit written comments to publiccomment@vcera.org prior to and during the Board meeting. Please include your name, agenda item, the last 4 numbers of the telephone number that will be used to call in, and your comment. Public comment emails will be read into the record or summarized if lengthy.

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

TIME: 11:00 a.m.

ITEM:

I. CALL TO ORDER

A. Roll Call.

II. APPROVAL OF AGENDA

III. APPROVAL OF MINUTES

A. Finance Committee Meeting Minutes of June 15, 2023.

IV. OLD BUSINESS

A. Letter from Chair – Post-Retirement Health Insurance Premiums.
RECOMMENDED ACTION: Approve.

B. Actuarial Audit Services Request for Proposal (RFP) Update.
RECOMMENDED ACTION: Receive and File.

C. Analysis Result of March 31, 2023 - Management Fee Ratio Questions.
RECOMMENDED ACTION: Receive and File.

V. NEW BUSINESS

A. Fiscal Year 2022-23 Quarterly Financial Statements and Budget Summaries Update.

1. Staff Letter by Chief Financial Officer.

V. NEW BUSINESS (continued)

B. GASB 67 Actuarial Valuation Report as of June 30, 2022 - Revised.
RECOMMENDED ACTION: Receive and File.

1. Staff Letter by Chief Financial Officer.
2. GASB 67 Report, as of June 30, 2022 - Revised.

VI. PUBLIC COMMENT

VII. STAFF COMMENT

VIII. COMMITTEE MEMBER COMMENT

IX. ADJOURNMENT

VENTURA COUNTY EMPLOYEES' RETIREMENT ASSOCIATION

BOARD OF RETIREMENT

FINANCE COMMITTEE MEETING

JUNE 15, 2023

MINUTES

**TRUSTEES
PRESENT:**

Arthur E. Goulet, Finance Committee Chair, Retired Member
Jordan Roberts, General Employee Member
Tommie E. Joe, Public Member

**TRUSTEES
ABSENT:**

**STAFF
PRESENT:**

Linda Webb, Retirement Administrator
La Valda Marshall, Chief Financial Officer
Amy Herron, Chief Operations Officer
Leah Oliver, Chief Technology Officer
Brian Owen, Sr. Information Technology Specialist
Michael Sanchez, Sr. Information Technology Specialist
Chris Ayala, Program Assistant

PLACE:

Ventura County Employees' Retirement Association
Second Floor, Boardroom
1190 S. Victoria Avenue, Suite 200
Ventura, CA 93003

TIME:

11:00 a.m.

ITEM:

I. CALL TO ORDER

A. Roll Call.

Chair Goulet called the Finance Committee meeting of June 15, 2023, to order at 11:00 a.m.
Roll Call:

Trustees Present: Art Goulet, Tommie Joe, Jordan Roberts.

Trustees Absent: -

II. APPROVAL OF AGENDA

MOTION: Approve.

Moved by Roberts, seconded by Joe

Vote: Motion carried

Yes: Joe, Roberts, Goulet

No: -

Absent: -

Abstain: -

III. APPROVAL OF MINUTES

A. Finance Committee Meeting Minutes of May 15, 2023.

Chair Goulet noted a typo in the minutes for May 15th. The minutes incorrectly listed his title as, "Retiree Member", instead of, "Retired Member".

MOTION: Approve as Amended.

Moved by Roberts, seconded by Joe

Vote: Motion carried

Yes: Joe, Roberts, Goulet

No: -

Absent: -

Abstain: -

IV. OLD BUSINESS

A. Retiree Health Insurance Premium's Current Staff Eligibility Analysis.

RECOMMENDED ACTION: Receive and File.

1. Staff Letter by Chief Financial Officer.

2. Attachment A – Retiree Health Insurance Premium Coverage Analysis Result Summary.

3. Attachment A.1. – Retiree Health Insurance Premium Coverage Analysis Detail.

Chair Goulet stated at the last meeting he had requested that Ms. Marshall review which of VCERA's current employees would be eligible for the Retiree Health Insurance Premium benefit in the near future, and there was one identified. He then asked if the committee should recommend to the Board that the Retirement Administrator negotiate with the County of Ventura to not have them charge VCERA for the employee benefit at all or split the charge depending on how long the eligible retiree member had worked for the system, as opposed to working for the County itself.

Ms. Webb provided background on some of the discussions she had had with Shawn Atin, Assistant CEO/HR Director for the County of Ventura regarding the benefit. She explained that the County believed the cost of the benefit to VCERA was minimal, given VCERA's budget and did not feel that a change to the benefit was necessary. Therefore, the next step would be for the Board to extend the request to the County.

Trustee Joe said he felt the committee should bring the matter to the Board, so that they were aware of it, and to decide if they would like to proceed by making a formal request to the County.

Trustee Roberts remarked that he believed the County could be asked to pay for the portion of the benefit cost that was earned by the employee while they were employed with the County. However, considering the potential amount of time, effort, and cost it would take to fight for a change to the benefit, it may not be worth pursuing, given the fact that the benefit would only pertain to one employee. So, he believed they should bring the matter to the Board's attention so that they could decide on how to proceed.

MOTION: Bring the Item Back to Board of Retirement with a Recommendation that VCERA Continue to Pay the Retiree Health Care Premiums.

Moved by Roberts, seconded by Joe

Vote: Motion carried

Yes: Joe, Roberts

No: Goulet

Absent: -

Abstain: -

V. NEW BUSINESS

A. Fiscal Year 2022-23 Quarterly Financial Statements and Budget Summaries.

RECOMMENDED ACTION: Receive and File.

1. Staff Letter by Chief Financial Officer.
2. Financial Statements.
3. Budget Summaries.

Ms. Marshall presented the Quarterly Financial Statements and Budget Summaries for Fiscal Year 2022-23.

Chair Goulet said there were a few line items that caught this attention, which pertained to the fees paid to Investment Managers, particularly Walter Scott, HarbourVest, VWH Partners, Vitruvian and

Flex Point. He explained that the percentage of the fees seemed high relative to the amount of the portfolio that they each manage.

Ms. Marshall said that she did not have the amount of the fees that VCERA was required to pay according to the contract with these investment managers, so she would have to research the issue and get back to him with the information.

Chair Goulet was concerned with the amount that VCERA was paying for the hosting of the retirement data system.

Ms. Oliver reminded the committee that Trustee Goulet had initially asked Ms. Oliver to look into alternatives to VSG hosting of VCERA's Pension Administration System to reduce costs. There were some obstacles to this, and moving the hosting environment could also disrupt the Alameda Implementation Project, and would also be a major project. Another consideration was that the Pension Administration System would be at the end of its life in 10 years, so there were a number of factors that needed to be considered, but she would providing a report to the Board, with recommendations in the near future regarding these issues.

Chair Goulet noted the Staff Letter that was included with the materials did not have a recommendation from staff to the Board regarding the Quarterly Financial Statements and Budget Summaries, and there were a couple of typos that needed to be corrected.

MOTION: Approve the staff letter, with Amendments and Recommend to the Board of Retirement they Receive and File.

Moved by Roberts, seconded by Joe

Vote: Motion carried

Yes: Joe, Roberts, Goulet

No: -

Absent: -

Abstain: -

B. Review of Draft Fiscal Year 2023-2024 Proposed Budget.

RECOMMENDED ACTION: Adoption.

1. Staff Letter by Chief Financial Officer.
2. Proposed Budget for Fiscal Year 2023-24.
3. Budget Presentation by Chief Financial Officer.

To be Provided.

Ms. Marshall presented the Proposed Budget for Fiscal Year 2023-24. She pointed out that on page 2 of the staff letter, in the second paragraph, there was a typo which stated that there was an increase of 5 Full-Time Equivalentents (FTE's) over the previous fiscal year, which would be corrected to list 4 Full-Time Equivalentents.

Chair Goulet noted an increase in the line item for *Technology – V3 Software*.

Ms. Oliver explained that the increase in the line item was related to reporting software for the V3 Retirement Administration System, to allow staff to run various reports, including one for the Alameda

Implementation project. Additionally, the increased cost in the line item was also related to a number of enhancements to the V3 software that staff was making because of the Alameda Implementation.

Chair Goulet proposed that staff add a separate line item to accommodate the enhancements to V3 due to the Alameda Implementation.

Ms. Marshall said staff would add a column with a corresponding total budget that's related to Alameda projected costs, as well as noting which costs were associated with Consulting Services and Reporting Solutions.

MOTION: Recommend the Board of Retirement Adopt the Proposed Fiscal Year 2023-2024 Budget, with the Noted Clarifications.

Moved by Roberts, seconded by Joe

Vote: Motion carried

Yes: Joe, Roberts, Goulet

No: -

Absent: -

Abstain: -

Trustee Roberts left the meeting at 12:15 p.m., after the vote.

Trustee Roberts returned to the meeting at 12:19 p.m.

VI. PUBLIC COMMENT

None.

VII. STAFF COMMENT

None.

VIII. COMMITTEE MEMBER COMMENT

Trustee Roberts thanked staff for all of the hard work that they had done.

Ms. Webb commended Ms. Marshall for her work on the budget.

Chair Goulet said Ms. Marshall was a pleasure to work with.

IX. ADJOURNMENT

The Chair adjourned the meeting at 12:45 p.m.

Approved,

ART GOULET, Finance Committee Chair



Board of Retirement
Ventura County Employees' Retirement Association
1190 S. Victoria Avenue, Suite 200
Ventura, CA 93003

SUBJECT: Post-Retirement Health Insurance Premiums

Dear Board Members,

Since April of this year, the Finance Committee has been considering what recommendation it should make to the Board of Retirement (BoR) regarding payment of Post-Retirement Health Insurance premiums earned by eligible employees based on their County service.

As a reminder, except for Executive Management who are VCERA employees, all others performing work for VCERA are management or confidential County employees covered by the County Management Resolution. Section 506 (formerly 504) of the Resolution provides:

..... the County shall contribute an amount for the purpose of health plan premium payments to employees covered by this resolution who retire after July 1, 1999,The amount of the County's contribution to such retirees shall be equal to the monthly equivalent of the premium charged to active employees for the Ventura County Health Care Plan "VCHCP." Payment shall be made directly to the retiree. (e)ligibility shall be based upon the retiree's longevity as an employee of the County of Ventura as follows: for every five (5) full years of service completed with the County of Ventura the retiree shall be entitled to one year of health premium allowance; in no event shall the health premium contribution extend beyond five years from the date of retirement. The above provisions apply only to employees covered by the Management Resolution before July 3, 2005.

Further, the County Budget Development Manual provides that the payment will be charged directly against the department from which eligible employees retire. Prior to the passage of Proposition 162 in 1962, management of VCERA was a function of the Treasurer-Tax Collector's office and payment for the post-retirement health insurance premium would have been charged to that office's budget. However, notwithstanding that VCERA subsequently became an independent entity and is no longer a County department, the County has been charging VCERA for the cost of post-retirement health insurance premiums for eligible retirees, allegedly pursuant to the current Human Resources Services Agreement between VCERA and the County and, presumably, pursuant to predecessor agreements. A review of such agreement revealed no provision pertaining to this County post-retirement benefit.

Currently there are only three retirees whose final service was for VCERA while a County employee, and who were eligible for Post-Retirement Health Insurance

P.2

premiums. The current fiscal year cost for each is \$16,500 and \$49,500 is included in the 2023-24 FY budget. 2024 will be the last year of entitlement for one retiree. The other two will exhaust their entitlements in 2026 and 2027, respectively. The estimated future costs for these retirees total \$80,542.

While there are no other County employees working for VCERA eligible for Post-Retirement Health insurance Premiums, there is one VCERA employee whose prior County service entitles that employee to five full years of Post-Retirement Health Insurance premiums. Assuming this employee retires in 2025, the estimated future cost is \$100,557.

Depending on one's point of view as to whether payment for Post-Retirement Health Insurance premiums based on service as a County employee is a responsibility of the Retirement System, there several alternatives for future action:

- Continue paying for the benefit as VCERA has historically
- Seek agreement with the County that future payments be pro-rated such that VCERA pays only for the portion of the benefit earned while the County employee performed work for VCERA
- Cease paying for the benefit beginning with the current fiscal year
- Seek recovery of all or a portion of past payments

One Finance Committee member remarked that he believed the County could be asked to pay for the portion of the benefit cost that was earned by the employee while they were employed with the County and not performing work for VCERA. However, considering the potential amount of time, effort, and cost it would take to fight for a change to the benefit, it may not be worth pursuing, given the fact that the benefit would only pertain to one additional employee. So, he believed the Committee should bring the matter to the Board's attention so that they could decide on how to proceed and made the following motion:

- Bring the Item Back to Board of Retirement with a Recommendation that VCERA Continue to Pay the Retiree Health Care Premiums.

The motion passed 2 to 1, so the Board needs to decide how to proceed.

Sincerely,



Chair, Finance Committee

August 21, 2023

Finance Committee
Ventura County Employees' Retirement Association
1190 South Victoria Avenue, Suite 200
Ventura, CA 93003

SUBJECT: RECEIVE AND FILE – ACTUARIAL AUDIT SERVICES REQUEST for PROPOSAL (RFP) UPDATE

Dear Finance Committee:

On May 15, 2023 staff presented the Finance Committee with a DRAFT RFP for Actuarial Audit Services (Redline). During the meeting, staff received feedback from the Finance Committee. Staff updated the redline and created a clean and final RFP for presentation to the Retirement Board, on May 22, 2023..

On May 22, 2023 the Retirement Board (1) Approved the Request for Proposal (RFP) for Actuarial Audit Services; (2) Directed Staff to Issue the RFP to Gabriel, Roeder, Smith & Company (GRS), Milliman, Cheiron, and various websites; and (3) Directed Staff to Review the Responses to the RFP and Develop a Recommendation to the Board Regarding the Firm that Should be Selected for the Engagement.

Staff is pleased to provide the Finance Committee with an Actuarial Audit Services RFP project update. See Attachment A.

RECOMMENDATION: RECEIVE AND FILE – ACTUARIAL AUDIT SERVICES REQUEST for PROPOSAL (RFP) UPDATE

Staff will be happy to answer any questions at today's Finance Committee meeting.

Sincerely,



La Valda R. Marshall
Chief Financial Officer

Attachment A: Actuarial Audit Services RFP Update

Ventura County Employee's Retirement Association (VCERA)
Actuarial Audit Services RFP Update
As of August 2023

DAY	ACTION ITEM (WHAT)	FROM	Target Date	STATUS	NOTES
-56	RFP presented to Finance Committee	Staff - CFO	5/15/2023	Complete	RFP approved to present to Retirement Board at 5/22/2023 meeting.
-49	RFP Approval to release	Retirement Board	5/22/2023	Complete	RFP approved to distribute.
-35	RFP Distribution	Fiscal / Admin	6/5/2023	Complete	Emails sent to 2 potential Firms and U.S. mailing to same 2 potential Firms + 1 additional potential Firm.
-11	Firm Information Request	Potential Firms	6/29/2023	Complete	2023 Actuarial Audit RFP Q & As 2017 Actuarial Audit Presentation Hyperlink: https://www.vcera.org/post/rfp-actuarial-auditing-services
0	Proposal Submission	Firms	7/10/2023	Complete	Received 2 bids.
22	RFP Team Identified/Formed	RFP Staff Team	8/1/2023	Complete	Team: CFO, Accounting Manager, and Program Assistant.
42	Update provided to Finance Committee (FC)	CFO	8/21/2023	Scheduled	Provide an update and receive any FC questions and/or comments.
52	RFP Proposal Submission Review	RFP Staff Team	By 8/31/2023	Active	Bids were distributed, being evaluated and discussed.
59	Firm Interviews (Determination)	RFP Staff Team	9/7/2023	Not Started	Interviews may or may not occur.
66	Firm Interviews (Scheduling)	RFP Staff Team	9/14/2023	Not Started	If Interviews will occur.
73	Week of Firm Interviews	RFP Staff Team	9/21/2023	Not Started	If required, at the earliest.
77	Develop a Recommendation to the Board regarding the Firm that Should be Selected for the Engagement.	RFP Staff Team	9/25/2023	Not Started	Staff Letter from CFO
91	Decision Award Notification	RFP Staff Team	10/9/2023	Not Started	On or after September 22, 2023.
120	Actuarial Services Audit Contract in place	RFP Staff Team	11/7/2023	Not Started	Project Complete.



August 21, 2023

Finance Committee
Ventura County Employees' Retirement Association
1190 South Victoria Avenue, Suite 200
Ventura, CA 93003

SUBJECT: RECEIVE AND FILE – ANALYSIS RESULT of MARCH 31, 2023 – MANAGEMENT FEE RATIO QUESTIONS.

Dear Finance Committee:

On June 15, 2023 staff presented the Finance Committee with the Fiscal Year Quarter Ended, March 31, 2023 – Quarterly Financial Statements and Budget Summaries. Staff received valuable feedback and questions from the Finance Committee.

Staff received a few questions pertaining to the fees paid to Investment Managers, particularly Walter Scott, HarbourVest, VWH Partners, Vitruvian and Flex Point. Specifically, the percentage of the fees seemed high relative to the amount of the portfolio that each of the aforementioned investment managers manage. Staff agreed to perform research analysis and bring the result to the next Finance Committee meeting.

Staff is pleased to provide the Finance Committee with the Analysis Result of March 31, 2023 – Management Fee Ratio Questions. See Attachment A.

RECOMMENDATION: RECEIVE AND FILE – ANALYSIS RESULT of MARCH 31, 2023 – MANAGEMENT FEE RATIO QUESTIONS.

Staff will be happy to answer any questions at today's Finance Committee meeting.

Sincerely,

La Valda R. Marshall
Chief Financial Officer

Attachment A: Analysis Result of March 31, 2023 – Management Fee Ratio Question.

Ventura County Employees' Retirement Association (VCERA)
Management Fee Ratio Analysis
At the Period of March 31, 2023

ASSET Investment Description	Investment Market Value <i>(Denominator)</i>	NET Management Fee		
		Investment Expense Carried Interest	Management Fee <i>(Numerator)</i>	NET Management Fee
1 Non US Equity - Walter Scott	\$ 270,669,436	\$ - 0.00%	\$ 997,713 0.37%	\$ 997,713 0.37%
2 Private Equity - Flexpoint	\$ 9,924,323	\$ 402,274 4.05%	\$ 411,883 4.15%	\$ 814,157 8.20%
3 Private Equity - Harbour/Vest	\$ 153,563,404	\$ - 0.00%	\$ 1,576,446 1.03%	\$ 1,576,446 1.03%
4 Private Equity - Vitruvian	\$ 14,854,902	\$ 1,461,686 9.84%	\$ 264,890 1.78%	\$ 1,726,576 11.62%
5 Private Credit - VWH Partners III	\$ 20,768,911	\$ 124,459 0.60%	\$ 939,041 4.52%	\$ 1,063,500 5.12%

This management fee ratio analysis is submitted in response to the 06.15.2023 Item V.A.2 Investment Management Fee review questions. The stand-alone management fee amounts and percentages, for selected asset-investment, are displayed in column "E."



August 21, 2023

Finance Committee
Ventura County Employees' Retirement Association
1190 South Victoria Avenue, Suite 200
Ventura, CA 93003

SUBJECT: RECEIVE AND FILE - FISCAL YEAR 2022-23 QUARTERLY FINANCIAL STATEMENTS AND BUDGET SUMMARIES UPDATE.

Dear Finance Committee:

The Fiscal Year 2022-23 Quarterly Financial Statements and Budget Summaries for the quarter ended June 30, 2023 will not be presented at this August 21, 2023 Finance Committee meeting. The delay is due to asset-investment and expenditure information, expected to arrive for processing within next few weeks.

Fiscal staff plans to close the June 30, 2023 general ledger (GL) by September 8, 2023. Staff looks forward to presenting this financial information at a September 2023 Finance Committee meeting.

RECOMMENDED ACTION: Receive and File the FISCAL YEAR 2022-23 QUARTERLY FINANCIAL STATEMENTS AND BUDGET SUMMARIES UPDATE.

I would be happy to respond to any questions you may have on this matter.

Sincerely,

La Valda R. Marshall
Chief Financial Officer

September 11, 2023

Board of Retirement
Ventura County Employees' Retirement Association
1190 South Victoria Avenue, Suite 200
Ventura, CA 93003

SUBJECT: GASB 67 ACTUARIAL VALUATION REPORT AS OF JUNE 30, 2022 - REVISED.

Dear Board Members:

In January 2023, Paul Angelo, Segal Consulting presented the Actuarial Information - GASB 67 Actuarial Valuation Report as of June 30, 2022 to the Retirement Board. The Retirement Board adopted to receive and file the report.

In February 2023, a DRAFT GASB 68 report, Actuarial Valuation Based on June 30, 2022 Measurement Date for Employer Reporting as of June 30, 2023 (GASB 68 report) was received from Segal. The GASB 68 report was distributed to County of Ventura (i.e., includes Ventura County Courts), Ventura County Air Pollution Control District (VCAPCD) and Ventura Regional Sanitation District (VRSD), the applicable employers, for their review and comment.

In May 2023, VRSD brought to staff's attention that their GASB 68, FY 2022 "pensionable earnings" was significantly overstated. Consequently, VCERA staff researched and reviewed the cause and components of the overstatement. VCERA updated the actuarial data source, submitted to Segal, and requested a revised DRAFT GASB 68 report. Through lessons learned, procedures are now in place to prevent such an actuarial data submission error, prompting a report revision.

In August 2023, the revised GASB 68 report was received. Consequently, GASB 67 Actuarial Valuation Report as of June 30, 2022 required changes. See the attached GASB 68 report. The changes are revised numbers on pages 19 and 20 (covered payroll and NPL/contributions expressed as a percentage of covered payroll) as well as in Appendices B and C. Appendix B provides the revised allocation that is used in the revised GASB 68 report.

The GASB 67 Actuarial Valuation Report as of JUNE 30, 2022 – Revised was presented to and reviewed by the Finance Committee at its August 21, 2023 meeting and the committee recommends that Board receive and file.

RECOMMENDATION: RECEIVE AND FILE GASB 67 ACTUARIAL VALUATION REPORT AS OF JUNE 30, 2022 - REVISED.

Staff will be happy to answer any questions at today's Disability meeting.

Sincerely,



La Valda R. Marshall
Chief Financial Officer

Ventura County Employees' Retirement Association

Governmental Accounting Standards Board Statement No. 67 (GAS 67) Actuarial Valuation

As of June 30, 2022



This report has been prepared at the request of the Board of Retirement to assist in administering the Plan. This valuation report may not otherwise be copied or reproduced in any form without the consent of the Board of Retirement and may only be provided to other parties in its entirety, unless expressly authorized by Segal. The measurements shown in this actuarial valuation may not be applicable for other purposes.

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August 14, 2023

Board of Retirement
Ventura County Employees' Retirement Association
1190 S. Victoria Avenue, Suite 200
Ventura, CA 93003-6572

Dear Board Members:

We are pleased to submit this Governmental Accounting Standards Board Statement No. 67 (GAS 67) Actuarial Valuation as of June 30, 2022. It contains various information that will need to be disclosed in order to comply with GAS 67.

This report was prepared in accordance with generally accepted actuarial principles and practices at the request of the Board to assist VCERA in preparing items related to the pension plan in their financial report. The census and financial information on which our calculations were based was prepared by VCERA. That assistance is gratefully acknowledged.

The measurements shown in this actuarial valuation may not be applicable for other purposes. Future actuarial measurements may differ significantly from the current measurements presented in this report due to such factors as the following: plan experience differing from that anticipated by the economic or demographic assumptions; changes in economic or demographic assumptions; increases or decreases expected as part of the natural operation of the methodology used for these measurements; and changes in plan provisions or applicable law.

The actuarial calculations were directed under the supervision of Molly Calcagno, ASA, MAAA, Enrolled Actuary. We are members of the American Academy of Actuaries and we meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion herein. To the best of our knowledge, the information supplied in the actuarial valuation is complete and accurate. Further, in our opinion, the assumptions as approved by the Board are reasonably related to the experience of and expectations for the Plan.

We look forward to reviewing this report with you and to answering any questions.

Sincerely,

Segal

A handwritten signature in black ink, appearing to read "Paul Angelo", written over a horizontal line.

Paul Angelo, FSA, MAAA, FCA, EA
Senior Vice President and Actuary

A handwritten signature in blue ink, appearing to read "Molly Calcagno", written over a horizontal line.

Molly Calcagno, ASA, MAAA, EA
Actuary

JY/jl

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Section 1: Actuarial Valuation Summary

Purpose and basis

This report has been prepared by Segal to present certain disclosure information required by Governmental Accounting Standards Board Statement No. 67 (GAS 67) as of June 30, 2022. This valuation is based on:

- The benefit provisions of VCERA, as administered by the Board of Retirement;
- The characteristics of covered active members, inactive vested members, and retired members and beneficiaries as of June 30, 2021, provided by VCERA;
- The assets of the Plan as of June 30, 2022, provided by VCERA;
- Economic assumptions regarding future salary increases and investment earnings adopted by the Board of Retirement for the June 30, 2022 valuation; and
- Other actuarial assumptions, regarding employee terminations, retirement, death, etc. adopted by the Board of Retirement for the June 30, 2022 valuation.

General observations on GAS 67 actuarial valuation

1. It is important to note that the Governmental Accounting Standards Board (GASB) rules only define pension liability and expense for financial reporting purposes, and do not apply to contribution amounts for actual pension funding purposes. Employers and plans should develop and adopt funding policies under current practices.
2. When measuring pension liability, GASB uses the same actuarial cost method (Entry Age method) and the same type of discount rate (expected return on assets) as VCERA uses for funding. This means that the Total Pension Liability (TPL) measure for financial reporting shown in this report is determined on generally the same basis as VCERA's Actuarial Accrued Liability (AAL) measure for funding. We note that the same is generally true for the Normal Cost component of the annual plan cost for funding and financial reporting.
3. It is our understanding that VCERA terminated the non-vested supplemental (\$27.50) reserve after the June 2019 payment due to the depletion of that Reserve. Any remaining amount in that Reserve is available to pay retroactive benefits, if any. Note that we have included the Reserve amount in the Plan's Fiduciary Net Position but have not included any corresponding liability amount in the TPL.

Section 1: Actuarial Valuation Summary

4. The Net Pension Liability (NPL) is equal to the difference between the TPL and the Plan's Fiduciary Net Position. The Plan's Fiduciary Net Position is equal to the market value of assets and therefore, the NPL measure is very similar to an Unfunded Actuarial Accrued Liability (UAAL) calculated on a market value basis.

Highlights of the valuation

1. For this report, the reporting dates for the Plan are June 30, 2022 and 2021. The NPLs measured as of June 30, 2022 and 2021 have been determined by rolling forward the TPL as of June 30, 2021 and 2020, respectively. The Plan's Fiduciary Net Position (plan assets) was valued as of the measurement dates. In addition, any changes in actuarial assumptions or plan provisions that occurred between the valuation date and the measurement date have been reflected.
2. The NPL increased from \$(505) million as of June 30, 2021 to \$438 million as of June 30, 2022 primarily due to the -7.25% return on the market value of assets during 2021/2022 (that was less than the assumed return of 7.00%). Changes in these values during the last two fiscal years ending June 30, 2022 and June 30, 2021 can be found in *Section 2, Schedules of changes in Net Pension Liability* on page 19.
3. The discount rate used to determine the TPL and NPL as of June 30, 2022 was 7.00% following the same assumption used by VCERA in the funding valuation as of the same date. The detailed derivation of the discount rate of 7.00% used in calculation of the TPL and NPL as of June 30, 2022 can be found in *Section 3, Appendix A*. Various other information that is required to be disclosed can be found throughout *Section 2*.
4. *Section 3* contains two schedules that the American Institute of Certified Public Accountants (AICPA) recommends be prepared by cost sharing pension plans. These two schedules contain summary information related to GAS 68 and are based on many of the results that will be shown in a separate GAS 68 report. The first schedule shows the method used for allocating the NPL along with the NPL amounts allocated amongst all of the employers in VCERA. The second schedule is a summary that shows the allocated NPL, deferred outflows and inflows of resources and pension expense by employer. Further information regarding GAS 68 including additional information that employers will need to disclose will be provided in a separate report that is anticipated to be completed during the first quarter of 2023.
5. On July 30, 2020, the California Supreme Court issued a decision in the Alameda County Deputy Sheriffs' Assn. et al. v. Alameda County Employees' Retirement Assn. litigation that clarified what should be considered compensation earnable for non-PEPRA members and pensionable compensation for PEPRA members. In response, the Board adopted a Resolution, which detailed the implementation of certain aspects of the Alameda decision including reclassifying certain pay items so that they are no longer included in compensation earnable, including standby and call-back pay. However, the Board has delayed certain exclusions including flexible benefit credits. As discussed with VCERA staff, the effect of the Alameda Decision will be reflected as gains and losses as issues are settled and corrections are made to the membership data provided for each

Section 1: Actuarial Valuation Summary

valuation. Our understanding is that the June 30, 2021 membership data (used in the roll forward to determine the TPL as of June 30, 2022) provided reflected some of the reclassifications of the pay codes that have been adopted by the Board for active members, including standby and call-back pay. Any additional changes in the membership data after June 30, 2021 as a result of the Alameda Decision will be reflected in future valuations once they are known. In addition, any additional impact on the Plan's Fiduciary Net Position related to recovery of benefits and/or refunds of member contributions previously paid in conjunction with these pay items has not been reflected in this valuation but will be reflected in future valuations once it is known.

6. It is important to note that this actuarial valuation is based on plan assets as of June 30, 2022. Due to the COVID-19 pandemic, market conditions have changed significantly since the onset of the Public Health Emergency. The plan's funded status does not reflect short-term fluctuations of the market, but rather is based on the market values on the last day of the plan year. Moreover, this actuarial valuation does not include any possible short-term or long-term impacts on mortality of the covered population that may emerge after June 30, 2022. While it is impossible to determine how the pandemic will affect market conditions and other demographic experience of the plan in future valuations, Segal is available to prepare projections of potential outcomes upon request.

Section 1: Actuarial Valuation Summary

Summary of key valuation results

Measurement Date		June 30, 2022	June 30, 2021
Disclosure elements for plan year ending June 30:	• Service cost ¹	\$165,663,753	\$152,049,281
	• Total Pension Liability	7,463,430,523	7,177,087,693
	• Plan's Fiduciary Net Position	7,025,332,391	7,681,553,297
	• Net Pension Liability	438,098,132	(504,465,604)
Schedule of contributions for plan year ending June 30:	• Actuarially determined contributions ²	\$178,667,231	\$178,628,118
	• Actual contributions	178,667,231	178,628,118
	• Contribution deficiency / (excess)	0	0
Demographic data for plan year ending June 30:³	• Number of retired members and beneficiaries	8,007	7,751
	• Number of inactive vested members ⁴	3,812	3,491
	• Number of active members	9,077	8,491
Key assumptions as of June 30:	• Investment rate of return	7.00%	7.00%
	• Inflation rate	2.50%	2.50%
	• Projected salary increases ⁵	General: 3.75% to 10.00% and Safety: 4.00% to 12.00%	General: 3.75% to 10.00% and Safety: 4.00% to 12.00%
	• Cost of living adjustments		
	– Tiers with 3.00% COLA	2.75%	2.75%
	– Tiers with fixed 2% COLA	2.00%	2.00%
	– Tiers without COLA	0.00%	0.00%

¹ The service cost is based on the previous year's valuation, meaning the 2022 and 2021 values are based on the valuations as of June 30, 2021 and June 30, 2020, respectively. The 2022 service cost has been calculated using the assumptions shown in the 2021 column and the 2021 service cost has been calculated using the assumptions used in the June 30, 2020 valuation. The key assumptions as of June 30, 2020 are as follows:

Key assumptions as of June 30, 2020:

Investment rate of return	7.25%
Inflation rate	2.75%
Projected salary increases*	General: 3.75% to 10.25% and Safety: 3.95% to 11.75%
Cost of living adjustments:	Tiers with 3.00% COLA: 2.75%, Tiers with fixed 2% COLA: 2.00% and Tiers without COLA: 0.00%

* Includes inflation at 2.75% plus real across-the-board salary increases of 0.50% plus merit and promotion increases.

² Actuarially Determined Contributions exclude employer paid member contributions.

³ Data as of June 30, 2021 is used in the measurement of the TPL as of June 30, 2022.

⁴ Includes inactive members with member contributions on deposit.

⁵ Includes inflation at 2.50% plus real across-the-board salary increases of 0.50% plus merit and promotion increases that vary by service.

Section 1: Actuarial Valuation Summary

Important information about actuarial valuations

An actuarial valuation is a budgeting tool with respect to the financing of future projected obligations of a pension plan. It is an estimated forecast – the actual long-term cost of the plan will be determined by the actual benefits and expenses paid and the actual investment experience of the plan.

In order to prepare a valuation, Segal relies on a number of input items. These include:

Plan of benefits	Plan provisions define the rules that will be used to determine benefit payments, and those rules, or the interpretation of them, may change over time. It is important to keep Segal informed with respect to plan provisions and administrative procedures, and to review the plan description in this report (as well as the plan summary included in our funding valuation report) to confirm that Segal has correctly interpreted the plan provisions.
Participant data	An actuarial valuation for a plan is based on data provided to the actuary by VCERA. Segal does not audit such data for completeness or accuracy, other than reviewing it for obvious inconsistencies compared to prior data and other information that appears unreasonable. It is important for Segal to receive the best possible data and to be informed about any known incomplete or inaccurate data.
Assets	This valuation is based on the market value of assets as of the measurement date, as provided by VCERA.
Actuarial assumptions	In preparing an actuarial valuation, Segal projects the benefits to be paid to existing plan participants for the rest of their lives and the lives of their beneficiaries. This projection requires actuarial assumptions as to the probability of death, disability, withdrawal, and retirement of each participant for each year. In addition, the benefits projected to be paid for each of those events in each future year reflect actuarial assumptions as to salary increases and cost-of-living adjustments. The projected benefits are then discounted to a present value, based on the assumed rate of return that is expected to be achieved on the plan's assets. There is a reasonable range for each assumption used in the projection and the results may vary materially based on which assumptions are selected. It is important for any user of an actuarial valuation to understand this concept. Actuarial assumptions are periodically reviewed to ensure that future valuations reflect emerging plan experience. While future changes in actuarial assumptions may have a significant impact on the reported results that does not mean that the previous assumptions were unreasonable.
Models	Segal valuation results are based on proprietary actuarial modeling software. The actuarial valuation models generate a comprehensive set of liability and cost calculations that are presented to meet regulatory, legislative and client requirements. Our Actuarial Technology and Systems unit, comprised of both actuaries and programmers, is responsible for the initial development and maintenance of these models. The models have a modular structure that allows for a high degree of accuracy, flexibility and user control. The client team programs the assumptions and the plan provisions, validates the models, and reviews test lives and results, under the supervision of the responsible actuary.

Section 1: Actuarial Valuation Summary

The user of Segal's actuarial valuation (or other actuarial calculations) should keep the following in mind:

The valuation is prepared at the request of the Board to assist VCERA in preparing items related to the pension plan in their financial reports. Segal is not responsible for the use or misuse of its report, particularly by any other party.

An actuarial valuation is a measurement of the plan's assets and liabilities at a specific date. Accordingly, except where otherwise noted, Segal did not perform an analysis of the potential range of future financial measures. The actual long-term cost of the plan will be determined by the actual benefits and expenses paid and the actual investment experience of the plan.

If VCERA is aware of any event or trend that was not considered in this valuation that may materially change the results of the valuation, Segal should be advised, so that we can evaluate it.

Segal does not provide investment, legal, accounting, or tax advice. Segal's valuation is based on our understanding of applicable guidance in these areas and of the plan's provisions, but they may be subject to alternative interpretations. The Board should look to their other advisors for expertise in these areas.

As Segal has no discretionary authority with respect to the management or assets of VCERA, it is not a fiduciary in its capacity as actuaries and consultants with respect to VCERA.

Section 2: GAS 67 Information

General information about the pension plan

Plan Description

Plan administration. The Ventura County Employees' Retirement Association (VCERA) was established by the County of Ventura in 1947. VCERA is administered by the Board of Retirement and governed by the County Employees' Retirement Law of 1937 (California Government Code Section 31450 et seq.) and the California Public Employees' Pension Reform Act of 2013 or "PEPRA" (California Government Code Section 7522 et seq.). VCERA is a cost-sharing multiple employer public employee retirement system whose main function is to provide service retirement, disability, death and survivor benefits to the safety and general members employed by the County of Ventura. VCERA also provides retirement benefits to the employee members of the Ventura County Courts, Air Pollution Control District, the Ventura Regional Sanitation District and VCERA.

The management of VCERA is vested with the VCERA Board of Retirement. The Board consists of nine members and three alternates. The County Treasurer is elected by the general public and a member of the Board of Retirement by law. Four members and one alternate, one of whom may be a County Supervisor, are appointed by the Board of Supervisors. Two members are elected by the general membership; one member and one alternate are elected by the safety membership, one member and one alternate are elected by the retired members of the Association. All members of the Board of Retirement serve terms of three years except for the County Treasurer whose term runs concurrent with his term as County Treasurer.

Plan membership. At June 30, 2022, pension plan membership consisted of the following:

Retired members or beneficiaries currently receiving benefits	8,007
Inactive vested members entitled to but not yet receiving benefits ¹	3,812
Active members	<u>9,077</u>
Total	20,896

Note: Data as of June 30, 2022 is not used in the measurement of the TPL as of June 30, 2022.

¹ Includes inactive members with member contributions on deposit.

Section 2: GAS 67 Information

Benefits provided. VCERA provides service retirement, disability, death and survivor benefits to eligible employees. All permanent employees of the County of Ventura or contracting district who work a regular schedule of 64 or more hours per bi-weekly pay period become members of VCERA upon appointment. There are separate retirement plans for safety and general member employees. Safety membership is extended to those involved in active law enforcement, fire suppression, and probation. The table below indicates all existing VCERA membership tiers:

Membership Tier	Retirement Eligibility
Tier 1 - General Legacy Members hired before January 1, 2013	Age 50 and 10 or more years of service credit, or 30 years or more of service credit, regardless of age. Age 70, regardless of service.
Tier 1 - Safety Legacy Members hired before January 1, 2013	Age 50 and 10 or more years of service credit, or 20 years or more of service credit, regardless of age. Age 70, regardless of service.
Tier 2 - General Legacy Members hired before January 1, 2013	Age 50 and 10 or more years of service credit, or 30 years or more of service credit, regardless of age. Age 70, regardless of service.
Tier 2 COLA - General Legacy Members hired before January 1, 2013	Age 50 and 10 or more years of service credit, or 30 years or more of service credit, regardless of age. Age 70, regardless of service.
Tier 5 ¹ - General PEPRA Members hired on or after January 1, 2013	Age 52 and five years of service credit. Age 70, regardless of service credit.
Tier 6 ² - General PEPRA Members hired on or after January 1, 2013	Age 52 and five years of service credit. Age 70, regardless of service credit.
Tier 7 ³ - Safety PEPRA Members hired on or after January 1, 2013	Age 50 and five years of service credit. Age 70, regardless of service credit.
Tier 8 ² COLA - General PEPRA Members hired on or after January 1, 2013	Age 52 and five years of service credit. Age 70, regardless of service credit.

¹ These are also referred to as PEPRA Tier 1.

² These are also referred to as PEPRA Tier 2.

³ These are also referred to as Safety PEPRA.

Section 2: GAS 67 Information

The retirement benefit the member will receive is based upon age at retirement, final average compensation, years of retirement service credit and retirement plan and tier.

General member benefits for Tier 1 and Tier 2 are calculated pursuant to the provisions of California Government Code Sections 31676.11 and 31676.1, respectively. The monthly allowance is equal to 1/90th of the first \$350 of final compensation, plus 1/60th of the excess final compensation times years of accrued retirement service credit times age factor from either Section 31676.11 (Tier 1) or 31676.1 (Tier 2). General member benefits for those who are first hired on or after January 1, 2013, are calculated pursuant to the provisions of California Government Code Section 7522.20(a). The monthly allowance is equal to the final compensation multiplied by years of accrued retirement credit multiplied by the age factor from Section 7522.20(a).

Safety member benefits are calculated pursuant to the provisions of California Government Code Section 31664. The monthly allowance is equal to 1/50th of final compensation times years of accrued retirement service credit times age factor from Section 31664. For those Safety members first hired on or after January 1, 2013, benefits are calculated pursuant to the provisions of California Government Code Section 7522.25(d). The monthly allowance is equal to the final compensation multiplied by years of accrued retirement credit multiplied by the age factor from Section 7522.25(d).

For members with membership dates before January 1, 2013, the maximum monthly retirement allowance is 100% of final compensation. There is no 100% of final average compensation limit on the maximum monthly retirement allowance benefit for members with membership dates on or after January 1, 2013. However, the maximum amount of compensation earnable that can be considered for purposes of retirement contributions and benefit calculations for 2022 for members hired on or after July 1, 1996 but before January 1, 2013 is \$305,000. For members hired on or after January 1, 2013 who are enrolled in Social Security, the maximum amount of pensionable compensation that can be considered for purposes of retirement contributions and benefit calculations for 2022 is \$134,974 (\$161,969 for those not enrolled in Social Security). These limits are adjusted on an annual basis. Members are exempt from paying member contributions and employers are exempt from paying employer contributions on compensation in excess of the annual cap.¹

Final average compensation consists of the highest 12 consecutive months for Legacy Safety and Tier 1 General members. The final average compensation consists of the highest 36 consecutive months for all other tiers.

The member may elect an unmodified retirement allowance, or choose an optional retirement allowance. The unmodified retirement allowance provides the highest monthly benefit and a 60% continuance to an eligible surviving spouse. An eligible surviving spouse is one married to the member one year prior to the effective retirement date or at least two years prior to the date of death and has attained age 55 on or prior to the date of death. There are four optional retirement allowances the member may choose. Each of the

¹ Members and employers do not pay contributions on compensation in excess of the pensionable compensation caps.

Section 2: GAS 67 Information

optional retirement allowances requires a reduction in the unmodified retirement allowance in order to allow the member the ability to provide certain benefits to a surviving spouse or named beneficiary having an insurable interest in the life of the member.

VCERA provides an annual cost-of-living adjustment (COLA) benefit to Safety and Tier 1 General member retirees. The COLA, based upon the change in the December-to-December Consumer Price Index for the Los Angeles-Long Beach-Anaheim Area, is capped at 3.0%. Certain Tier 2 and all Tier 8 General member retirees receive a fixed 2% COLA that applies to future service after March 2003 pursuant to collective bargaining agreements.

The employers contribute to the retirement plan based upon actuarially determined contribution rates adopted by the Board of Retirement. Employer contribution rates are adopted annually based upon recommendations received from VCERA's actuary after the completion of the annual actuarial valuation. The average employer contribution rate as of June 30, 2022 for 2021/2022 (based on the June 30, 2020 valuation) was 22.22% of compensation.

Members are required to make contributions to VCERA up to the requisite limits, regardless of the retirement plan or tier.¹ The average member contribution rate as of June 30, 2022 for 2021/2022 (based on the June 30, 2020 valuation) was 9.91% of compensation.

¹ Safety Legacy members with 30 or more years of service are exempt from paying member contributions. The same applies for General Legacy members hired on or before March 7, 1973.

Section 2: GAS 67 Information

Net Pension Liability

The components of the Net Pension Liability were as follows:

Measurement Date	June 30, 2022	June 30, 2021
Total Pension Liability	\$7,463,430,523	\$7,177,087,693
Plan's Fiduciary Net Position	(7,025,332,391)	(7,681,553,297)
Net Pension Liability	\$438,098,132	\$(504,465,604)
Plan's Fiduciary Net Position as a percentage of the Total Pension Liability	94.13%	107.03%

The Net Pension Liability (NPL) was measured as of June 30, 2022 and 2021. The Plan's Fiduciary Net Position (plan assets) was valued as of the measurement date while the Total Pension Liability (TPL) was determined based upon rolling forward the TPL from actuarial valuations as of June 30, 2021 and 2020, respectively.

Plan provisions. The plan provisions used in the measurement of the NPL as of June 30, 2022 and 2021 are the same as those used in the VCERA actuarial valuations as of June 30, 2022 and 2021. The TPL and the Plan's Fiduciary Net Position include liabilities and assets held for the non-vested supplemental (\$27.50) reserve.¹

Actuarial assumptions. The TPLs as of June 30, 2022 and 2021 were determined by actuarial valuations as of June 30, 2021 and 2020, respectively. The actuarial assumptions used were based on the results of an experience study for the period from July 1, 2017 through June 30, 2020 and they are the same assumptions used in the June 30, 2022 and 2021 funding valuations for VCERA. In particular, the following actuarial assumptions were applied to all periods included in the measurement:

¹ It is our understanding that the VCERA has terminated the non-vested supplemental reserve after the June 2019 payment due to the depletion of that Reserve.

Section 2: GAS 67 Information

Investment rate of return:	7.00%, net of pension plan investment expense, including inflation
Inflation rate:	2.50%
Real across-the-board salary increase:	0.50%
Projected salary increases:	General: 3.75% to 10.00% and Safety: 4.00% to 12.00%, varying by service, including inflation and real across-the-board salary increase
Cost of living adjustments (COLA):	<p>Retiree COLA increases of 2.75% per year for both PEPRA and Non-PEPRA General Tier 1 and both PEPRA and Non-PEPRA Safety. For both PEPRA and non-PEPRA General Tier 2, members represented by SEIU receive a fixed 2% COLA that applies to future service after March 2003.</p> <p>For both PEPRA and Non-PEPRA General Tier 1 and both PEPRA and Non-PEPRA Safety members that have COLA banks, we assume they receive 3.0% COLA increases until their COLA banks are exhausted and 2.75% thereafter. For both PEPRA and non-PEPRA General Tier 2 members represented by SEIU, the fixed 2% COLA increase is not subject to changes in the CPI.</p>
Other assumptions:	See analysis of actuarial experience during the period July 1, 2017 through June 30, 2020

The Entry Age Actuarial Cost Method used in VCERA's annual actuarial valuation has also been applied in measuring the service cost and TPL with one exception. For purposes of measuring the service cost and TPL, we have reflected the same plan provisions used in determining the member's Actuarial Present Value of Projected Benefits. This is different from the version of this method applied in VCERA's annual funding valuation, where the Normal Cost and Actuarial Accrued Liability are determined as if the current benefit accrual rate had always been in effect.

Section 2: GAS 67 Information

Determination of discount rate and investment rates of return

The long-term expected rate of return on pension plan investments¹ was determined in 2021 using a building-block method in which expected future real rates of return (expected returns, net of inflation) are developed for each major asset class. These returns are combined to produce the long-term expected rate of return by weighting the expected future real rates of return by the target asset allocation percentage, adding expected inflation and subtracting expected investment expenses and a risk margin. The target allocation and projected arithmetic real rates of return for each major asset class, after deducting inflation but before deducting investment expenses, are shown in the following tables. This information was used in the derivation of the long-term expected investment rate of return assumption in the June 30, 2022 and 2021 actuarial valuations. This information will change every three years based on the actuarial experience study.

June 30, 2022

Asset Class	Target Allocation	Long-Term Expected Arithmetic Real Rate of Return
Large Cap Equity	27.69%	5.39%
Small Cap Equity	3.96%	6.58%
Developed International Equity	16.04%	6.39%
Emerging Market Equity	4.31%	8.60%
Core Bonds	5.00%	0.83%
Treasuries	2.00%	0.00%
Real Estate	8.00%	5.01%
Private Equity	16.00%	10.00%
Private Debt/Credit Strategies	6.00%	5.02%
Infrastructure	4.00%	5.89%
Natural Resources	2.00%	11.24%
Absolute Return Fixed Income	5.00%	2.17%
Total	100.00%	6.06%

¹ Note that the investment return assumption for funding purposes is developed net of both investment and administrative expenses; however, the same investment return assumption is used for financial reporting purposes, where it is considered gross of administrative expenses.

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Discount rate. The discount rate used to measure the TPL was 7.00% as of June 30, 2022 and 2021. The projection of cash flows used to determine the discount rate assumed plan member contributions will be made at the current contribution rate and that employer contributions will be made at rates equal to the actuarially determined contribution rates. For this purpose, only employer contributions that are intended to fund benefits for current plan members and their beneficiaries are included. Projected employer contributions that are intended to fund the service costs for future plan members and their beneficiaries, as well as projected contributions from future plan members, are not included. Based on those assumptions, the Plan's Fiduciary Net Position was projected to be available to make all projected future benefit payments for current plan members. Therefore, the long-term expected rate of return on pension plan investments was applied to all periods of projected benefit payments to determine the TPL as of both June 30, 2022 and 2021.

Section 2: GAS 67 Information

Discount rate sensitivity

Sensitivity of the Net Pension Liability to changes in the discount rate. The following presents the NPL as of June 30, 2022, calculated using the discount rate of 7.00%, as well as what the NPL would be if it were calculated using a discount rate that is 1-percentage-point lower (6.00%) or 1-percentage-point higher (8.00%) than the current rate:

	1% Decrease (6.00%)	Current Discount Rate (7.00%)	1% Increase (8.00%)
Net Pension Liability as of June 30, 2022	\$1,424,915,740	\$438,098,132	\$(377,163,465)

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Schedule of changes in Net Pension Liability – Last two fiscal years

Measurement Date	June 30, 2022	June 30, 2021
Total Pension Liability		
• Service cost	\$165,663,753	\$152,049,281
• Interest	501,494,181	487,569,069
• Change of benefit terms	0	0
• Differences between expected and actual experience	(23,717,377)	8,880,010
• Changes of assumptions	0	122,030,630
• Benefit payments, including refunds of member contributions	(357,097,727)	(332,965,261)
Net change in Total Pension Liability	\$286,342,830	\$437,563,729
Total Pension Liability – beginning	<u>7,177,087,693</u>	<u>6,739,523,964</u>
Total Pension Liability – ending	\$7,463,430,523	\$7,177,087,693
Plan's Fiduciary Net Position		
• Contributions – employer ¹	\$178,667,231	\$178,628,118
• Contributions – employee ¹	84,719,851	79,654,028
• Net investment income	(553,406,546)	1,849,957,596
• Benefit payments, including refunds of member contributions	(357,097,727)	(332,965,261)
• Administrative expense	(6,169,082)	(5,523,345)
• Other expense	(2,934,633)	(3,049,909)
Net change in Plan's Fiduciary Net Position	\$(656,220,906)	\$1,766,701,227
Plan's Fiduciary Net Position – beginning	<u>7,681,553,297</u>	<u>5,914,852,070</u>
Plan's Fiduciary Net Position – ending	\$7,025,332,391	\$7,681,553,297
Net Pension Liability – ending	\$438,098,132	\$(504,465,604)
Plan's Fiduciary Net Position as a percentage of the Total Pension Liability	94.13%	107.03%
Covered payroll²	\$834,433,000	\$785,121,000
Net Pension Liability as percentage of covered payroll	52.50%	(64.25%)

Notes to Schedule:

Benefit changes: None

¹ See footnote 2 on the following page.

² Covered payroll represents payroll on which contributions to the pension plan are based.

Section 2: GAS 67 Information

Schedule of employer contributions – Last ten fiscal years

Year Ended June 30	Actuarially Determined Contributions ^{1,2}	Contributions in Relation to the Actuarially Determined Contributions ^{1,2}	Contribution Deficiency / (Excess)	Covered Payroll ³	Contributions as a Percentage of Covered Payroll
2013	\$142,370,000	\$142,370,000	\$0	\$632,146,000	22.52%
2014	161,247,000	161,247,000	0	642,779,000	25.09%
2015	173,269,000	173,269,000	0	665,086,000	26.05%
2016	177,830,000	177,830,000	0	688,233,000	25.84%
2017	190,712,000	190,712,000	0	716,033,000	26.63%
2018	197,638,000	197,638,000	0	736,994,000	26.82%
2019	199,890,664	199,890,664	0	754,657,000	26.49%
2020	214,553,123	214,553,123	0	768,619,000	27.91%
2021	178,628,118	178,628,118	0	785,121,000	22.75%
2022	178,667,231	178,667,231	0	834,433,000	21.41%

See accompanying notes to this schedule on the next page.

¹ All “Actuarially Determined Contributions” through June 30, 2014 were determined as the “Annual Required Contribution” under GAS 25 and 27.

² Actuarially Determined Contributions exclude employer paid member contributions.

³ Covered payroll represents payroll on which contributions to the pension plan are based.

Section 2: GAS 67 Information

Notes to Schedule:

Methods and assumptions used to establish “actuarially determined contribution” rates:

Valuation date:	Actuarially determined contribution rates are calculated as of June 30, two years prior to the end of the fiscal year in which contributions are reported
Actuarial cost method:	Entry Age Actuarial Cost Method
Amortization method:	Level percent of payroll for total unfunded actuarial accrued liability
Remaining amortization period:	15 years for UAAL as of June 30, 2004. Any changes in UAAL after June 30, 2004 are separately amortized over a 15-year closed period effective with that valuation. Effective June 30, 2012, any changes in UAAL due to actuarial gains or losses or due to plan amendments (with the exception of a change due to retirement incentives) will be amortized over a 15-year closed period effective with that valuation (up to a 5-year closed period for retirement incentives). Any change in UAAL due to changes in actuarial assumptions or methods will be amortized over a 20-year closed period effective with that valuation.
Asset valuation method:	Market value of assets less unrecognized returns in each of the last ten semi-annual accounting periods. Unrecognized returns are equal to the difference between the actual market return and the expected return on market value and are recognized over a five-year period. The Actuarial Value of Assets is reduced by the value of the non-vested supplemental (\$27.50) reserve and statutory contingency reserve.

Section 2: GAS 67 Information

Actuarial assumptions:

Valuation Date:	June 30, 2020 Valuation (used for the year ended June 30, 2022 ADC)
Investment rate of return:	7.25%, net of pension plan administration and investment expenses, including inflation
Inflation rate:	2.75%
Real across-the-board salary increase:	0.50%
Projected salary increases:	General: 3.75% to 10.25% and Safety: 3.95% to 11.75%, varying by service, including inflation and real across-the-board salary increase
Cost of living adjustments (COLA):	<p>Retiree COLA increases of 2.75% per year for both PEPRA and Non-PEPRA General Tier 1 and both PEPRA and Non-PEPRA Safety. For both PEPRA and non-PEPRA General Tier 2, members represented by SEIU receive a fixed 2% COLA that applies to future service after March 2003.</p> <p>For both PEPRA and Non-PEPRA General Tier 1 and both PEPRA and Non-PEPRA Safety members that have COLA banks, we assume they receive 3.0% COLA increases until their COLA banks are exhausted and 2.75% thereafter. For both PEPRA and non-PEPRA General Tier 2 members represented by SEIU, the fixed 2% COLA increase is not subject to changes in the CPI.</p>
Other assumptions:	Same as those used in the June 30, 2020 funding actuarial valuation

Section 3: Appendices

Appendix A: Projection of Plan's Fiduciary Net Position for use in the Calculation of Discount Rate as of June 30, 2022 (\$ in millions)

Year Beginning July 1,	Projected Beginning Plan's Fiduciary Net Position (a)	Projected Total Contributions (b)	Projected Benefit Payments (c)	Projected Administrative Expenses (d)	Projected Investment Earnings (e)	Projected Ending Plan's Fiduciary Net Position (f) = (a) + (b) - (c) - (d) + (e)
2021	\$7,682	\$263	\$357	\$9	-\$553	\$7,025
2022	7,025	233	400	8	485	7,335
2023	7,335	228	402	9	507	7,660
2024	7,660	189	422	9	527	7,944
2025	7,944	156	443	9	545	8,193
2026	8,193	166	464	10	562	8,447
2027	8,447	162	486	10	579	8,692
2028	8,692	157	507	10	595	8,927
2029	8,927	153	528	11	611	9,152
2030	9,152	150	549	11	625	9,367
2046	10,795	54	847	13	726	10,716
2047	10,716	50	859	13	720	10,615
2048	10,615	47	870	13	712	10,491
2049	10,491	43	880	12	703	10,345
2050	10,345	40	887	12	693	10,178
2095	106	2	30	0 *	6	83
2096	83	1	23	0 *	5	66
2097	66	1	18	0 *	4	54
2098	54	1	13	0 *	3	45
2099	45	1	10	0 *	3	39
2100	39	1	7	0 *	3	35
2128	146	0 *	0 *	0 *	10	156
2129	156					
2129 Discounted Value:	0 **					

* Less than \$1 million, when rounded.

** \$156 million when discounted with interest at the rate of 7.00% per annum is less than \$1 million as of June 30, 2022.

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Appendix A: Projection of Plan's Fiduciary Net Position for use in the Calculation of Discount Rate as of June 30, 2022 (continued)

Notes:

- (1) Amounts may not total exactly due to rounding.
- (2) Amounts shown in the year beginning July 1, 2021 row are actual amounts, based on the unaudited financial statements provided by VCERA.
- (3) Various years have been omitted from this table.
- (4) Column (a): Except for the "discounted value" shown for 2129, none of the projected beginning Plan's Fiduciary Net Position amounts shown have been adjusted for the time value of money.
- (5) Column (b): Projected total contributions include employee and employer normal cost rates applied to closed group projected payroll (based on covered active members as of June 30, 2021), plus employer contributions to the unfunded actuarial accrued liability. Contributions are assumed to occur halfway through the year, on average.
- (6) Column (c): Projected benefit payments have been determined in accordance with paragraph 39 of GASB Statement No. 67, and are based on the closed group of active, inactive vested, retired members, and beneficiaries as of June 30, 2021. The projected benefit payments reflect the cost of living increase assumptions used in June 30, 2022 valuation report.
- (7) Column (d): Projected administrative expenses are calculated as approximately 0.12% of the projected beginning Plan's Fiduciary Net Position amount. The 0.12% portion was based on the actual fiscal year 2021/2022 administrative and other expenses (unaudited) as a percentage of the actual beginning Plan's Fiduciary Net Position as of July 1, 2021. Administrative expenses are assumed to occur halfway through the year, on average.
- (8) Column (e): Projected investment earnings are based on the assumed investment rate of return of 7.00% per annum.
- (9) As illustrated in this appendix, the Plan's Fiduciary Net Position was projected to be available to make all projected future benefit payments for current Plan members. In other words, there is no projected "cross-over date" when projected benefits are not covered by projected assets. Therefore, the long-term expected rate of return on Plan investments of 7.00% per annum was applied to all periods of projected benefit payments to determine the Total Pension Liability as of June 30, 2022 shown earlier in this report, pursuant to paragraph 44 of GASB Statement No. 67.
- 10) This projection is based on a model developed by our Actuarial Technology and Systems unit, comprised of both actuaries and programmers. The model allows the client team, under the supervision of the responsible actuary, control over the entry of future expected contribution income, benefit payments and administrative expenses. The projection of fiduciary net position and the discounting of benefits is part of the model.

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Appendix B: Determination of proportionate share

July 1, 2021 to June 30, 2022

Actual Compensation by Employer and Tier

Employer ID	Employer	General Tier 1 and 2	General Tier 1 and 2 %	Safety Tier	Safety Tier %	Total Compensation	Total %
01	County of Ventura	\$603,184,285	93.920%	\$192,201,096	100.000%	\$795,385,381	95.320%
10	Ventura County Courts	30,045,976	4.678%	0	0.000%	30,045,976	3.601%
11	Ventura County Air Pollution Control District	4,424,161	0.689%	0	0.000%	4,424,161	0.530%
22	Ventura Regional Sanitation District	<u>4,577,141</u>	<u>0.713%</u>	<u>0</u>	<u>0.000%</u>	<u>4,577,141</u>	<u>0.549%</u>
Total		\$642,231,563	100.000%	\$192,201,096	100.000%	\$834,432,659	100.000%

Allocation of June 30, 2022 Net Pension Liability (NPL)

Employer ID	Employer	General Tier 1 and 2	General Tier 1 and 2 %	Safety Tier	Safety Tier %	Total NPL	Employer Allocation Percentage
01	County of Ventura	\$273,944,272	93.920%	\$146,420,013	100.000%	\$420,364,285	95.952%
10	Ventura County Courts	13,645,785	4.678%	0	0.000%	13,645,785	3.115%
11	Ventura County Air Pollution Control District	2,009,292	0.689%	0	0.000%	2,009,292	0.459%
22	Ventura Regional Sanitation District	<u>2,078,770</u>	<u>0.713%</u>	<u>0</u>	<u>0.000%</u>	<u>2,078,770</u>	<u>0.474%</u>
Total		\$291,678,119	100.000%	\$146,420,013	100.000%	\$438,098,132	100.000%

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Appendix B: Determination of proportionate share (continued)

Notes to Schedule:

Actual July 1, 2021 through June 30, 2022 compensation information was provided by VCERA. Results may not total due to rounding.

The Net Pension Liability (NPL) for each tier is the Total Pension Liability (TPL) minus the Plan's Fiduciary Net Position. The TPL for each tier is obtained from internal valuation results based on the actual participants in each tier. The Plan's Fiduciary Net Position for each tier was determined by adjusting each tier's internally tracked valuation value of assets (which is used to determine employer contribution rates by tier) by the ratio of the total VCERA Plan's Fiduciary Net Position to total VCERA valuation value of assets. Based on this methodology, any non-valuation reserves (such as the \$27.50 non-vested supplemental reserve) are allocated amongst the tiers based on each tier's valuation value of assets.

The Safety Tier only has one employer (County of Ventura), so all of the NPL for that tier is allocated to the County.

For the two other tiers that have multiple employers, the NPL is allocated based on the actual compensation for each employer in the tier during the period ending on the measurement date within the tier.

- a. Calculate ratio of employer's compensation to the total compensation for the tier.
- b. This ratio is multiplied by the NPL for the tier to determine the employer's proportionate share of the NPL for the tier.
- c. If the employer is in several tiers, the employer's total allocated NPL is the sum of its allocated NPL from each tier.
- d. In this allocation, General Tier 1 and 2 were treated as one tier (combined) consistent with the determination of the Basic UAAL rate in the actuarial valuation.

Proportionate share of total plan NPL is then the ratio of the employer's total allocated NPL to the total NPL of all employers.

For purposes of the above results, the reporting date for the employer under GAS 68 is June 30, 2023. The reporting date and measurement date for the plan under GAS 67 are June 30, 2022. Consistent with the provisions of GAS 68 the assets and liabilities measured as of June 30, 2022 are not adjusted or "rolled forward" to June 30, 2023 for employer reporting under GAS 68. Other results, such as the total deferred inflows and outflows would also be allocated based on the same proportionate shares determined above.

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Appendix C: Pension amounts by employer as of June 30, 2022

	County of Ventura	Ventura County Courts	Ventura County Air Pollution Control District
Deferred Outflows of Resources			
Differences Between Expected and Actual Experience	\$16,743,925	\$543,538	\$80,034
Net Excess of Projected Over Actual Earnings on Pension Plan Investments (If Any)	97,894,177	3,177,822	467,923
Changes of Assumptions	83,242,413	2,702,199	397,889
Changes in Proportion and Differences Between Employer Contributions and Proportionate Share of Contributions	<u>4,585,691</u>	<u>2,055,754</u>	<u>745,592</u>
Total Deferred Outflows of Resources	\$202,466,206	\$8,479,313	\$1,691,438
Deferred Inflows of Resources			
Differences Between Expected and Actual Experience	\$18,286,331	\$593,607	\$87,407
Net Excess of Actual Over Projected Earnings on Pension Plan Investments (If Any)	0	0	0
Changes of Assumptions	0	0	0
Changes in Proportion and Differences Between Employer Contributions and Proportionate Share of Contributions	<u>2,932,960</u>	<u>3,319,106</u>	<u>694,946</u>
Total Deferred Inflows of Resources	\$21,219,291	\$3,912,713	\$782,353
Net Pension Liability			
Net Pension Liability as of June 30, 2021	\$(489,858,966)	\$(11,479,162)	\$(999,434)
Net Pension Liability as of June 30, 2022	\$420,364,285	\$13,645,785	\$2,009,292
Pension Expense			
Proportionate Share of Allocable Plan Pension Expense	\$66,210,294	\$2,149,306	\$316,478
Net Amortization of Deferred Amounts from Changes in Proportion and Differences Between Employer Contributions and Proportionate Share of Contributions	<u>80,779</u>	<u>(16,461)</u>	<u>(3,191)</u>
Total Employer Pension Expense Excluding That Attributable to Employer-Paid Member Contributions	\$66,291,073	\$2,132,845	\$313,287

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Appendix C: Pension amounts by employer as of June 30, 2022 (continued)

Deferred Outflows of Resources	Ventura Regional Sanitation District	Total for All Employers
Differences Between Expected and Actual Experience	\$82,801	\$17,450,298
Net Excess of Projected Over Actual Earnings on Pension Plan Investments (If Any)	484,103	102,024,025
Changes of Assumptions	411,647	86,754,148
Changes in Proportion and Differences Between Employer Contributions and Proportionate Share of Contributions	<u>131,614</u>	<u>7,518,651</u>
Total Deferred Outflows of Resources	\$1,110,165	\$213,747,122
Deferred Inflows of Resources		
Differences Between Expected and Actual Experience	\$90,429	\$19,057,774
Net Excess of Projected Over Actual Earnings on Pension Plan Investments (If Any)	0	0
Changes of Assumptions	0	0
Changes in Proportion and Differences Between Employer Contributions and Proportionate Share of Contributions	<u>571,639</u>	<u>7,518,651</u>
Total Deferred Inflows of Resources	\$662,068	\$26,576,425
Net Pension Liability		
Net Pension Liability as of June 30, 2021	\$(2,128,042)	\$(504,465,604)
Net Pension Liability as of June 30, 2022	\$2,078,770	\$438,098,132
Pension Expense		
Proportionate Share of Allocable Plan Pension Expense	\$327,421	\$69,003,499
Net Amortization of Deferred Amounts from Changes in Proportion and Differences Between Employer Contributions and Proportionate Share of Contributions	<u>(61,127)</u>	<u>0</u>
Total Employer Pension Expense Excluding That Attributable to Employer-Paid Member Contributions	\$266,294	\$69,003,499

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Appendix C: Pension amounts by employer as of June 30, 2022 (continued)

Amounts shown in this appendix, excluding the differences between employer contributions and proportionate share of contributions, were allocated by employer based on the Employer Allocation Percentage calculated in Appendix B.

In determining the pension expense:

- Any differences between projected and actual investment earnings on pension plan investments are recognized over a period of five years beginning with the year in which they occur.
- Differences between expected and actual experience and between employer contributions and proportionate share of contributions are recognized over the average of the expected remaining service lives of all employees that are provided with pensions through VCERA determined as of June 30, 2021 (the beginning of the measurement period ending June 30, 2022) and is 5.09 years.

The average of the expected remaining service lives of all employees was determined by:

- Calculating each active employee's expected remaining service life as the present value of \$1 per year of future service at zero percent interest.
- Setting the remaining service life to zero for each nonactive or retired member.
- Dividing the sum of the above amounts by the total number of active employee, nonactive and retired members.

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Appendix D: Definition of Terms

Definitions of certain terms as they are used in Statement 67. The terms may have different meanings in other contexts.

Actuarial Present Value of Projected Benefit Payments:	Projected benefit payments discounted to reflect the expected effects of the time value (present value) of money and the probabilities of payment.
Actuarial Valuation:	The determination, as of a point in time (the actuarial valuation date), of the service cost, Total Pension Liability, and related actuarial present value of projected benefit payments for pensions performed in conformity with Actuarial Standards of Practice unless otherwise specified by the GASB.
Actuarial Valuation Date:	The date as of which an actuarial valuation is performed.
Actuarially Determined Contribution:	A target or recommended contribution to a defined benefit pension plan for the reporting period, determined in conformity with Actuarial Standards of Practice based on the most recent measurement available when the contribution for the reporting period was adopted.
Ad Hoc Cost-of-Living Adjustments (Ad Hoc COLAs):	Cost-of-living adjustments that require a decision to grant by the authority responsible for making such decisions.
Ad Hoc Postemployment Benefit Changes:	Postemployment benefit changes that require a decision to grant by the authority responsible for making such decisions.
Automatic Cost-of-Living Adjustments (Automatic COLAs):	Cost-of-living adjustments that occur without a requirement for a decision to grant by a responsible authority, including those for which the amounts are determined by reference to a specified experience factor (such as the earnings experience of the pension plan) or to another variable (such as an increase in the consumer price index).
Automatic Postemployment Benefit Changes:	Postemployment benefit changes that occur without a requirement for a decision to grant by a responsible authority, including those for which the amounts are determined by reference to a specified experience factor (such as the earnings experience of the pension plan) or to another variable (such as an increase in the consumer price index).
Cost-of-Living Adjustments:	Postemployment benefit changes intended to adjust benefit payments for the effects of inflation.
Cost-Sharing Multiple-Employer Defined Benefit Pension Plan (Cost-Sharing Pension Plan):	A multiple-employer defined benefit pension plan in which the pension obligations to the employees of more than one employer are pooled and pension plan assets can be used to pay the benefits of the employees of any employer that provides pensions through the pension plan.
Covered Payroll:	Payroll on which contributions to the pension plan are based.
Defined Benefit Pension Plans:	Pension plans that are used to provide defined benefit pensions.

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Defined Benefit Pensions:	Pensions for which the income or other benefits that the employee will receive at or after separation from employment are defined by the benefit terms. The pensions may be stated as a specified dollar amount or as an amount that is calculated based on one or more factors such as age, years of service, and compensation. (A pension that does not meet the criteria of a defined contribution pension is classified as a defined benefit pension for purposes of Statement 67.)
Defined Contribution Pension Plans:	Pension plans that are used to provide defined contribution pensions.
Defined Contribution Pensions:	Pensions having terms that (1) provide an individual account for each employee; (2) define the contributions that an employer is required to make (or the credits that it is required to provide) to an active employee's account for periods in which that employee renders service; and (3) provide that the pensions an employee will receive will depend only on the contributions (or credits) to the employee's account, actual earnings on investments of those contributions (or credits), and the effects of forfeitures of contributions (or credits) made for other employees, as well as pension plan administrative costs, that are allocated to the employee's account.
Discount Rate:	<p>The single rate of return that, when applied to all projected benefit payments, results in an actuarial present value of projected benefit payments equal to the total of the following:</p> <ol style="list-style-type: none"> 1. The actuarial present value of benefit payments projected to be made in future periods in which (a) the amount of the pension Plan's Fiduciary Net Position is projected (under the requirements of Statement 67) to be greater than the benefit payments that are projected to be made in that period and (b) pension plan assets up to that point are expected to be invested using a strategy to achieve the long-term expected rate of return, calculated using the long-term expected rate of return on pension plan investments. 2. The actuarial present value of projected benefit payments not included in (1), calculated using the municipal bond rate.
Entry Age Actuarial Cost Method:	A method under which the actuarial present value of the projected benefits of each individual included in an actuarial valuation is allocated on a level basis over the earnings or service of the individual between entry age and assumed exit age(s). The portion of this actuarial present value allocated to a valuation year is called the normal cost. The portion of this actuarial present value not provided for at a valuation date by the actuarial present value of future normal costs is called the actuarial accrued liability.
Inactive Employees:	Terminated individuals that have accumulated benefits but are not yet receiving them, and retirees or their beneficiaries currently receiving benefits.
Multiple-Employer Defined Benefit Pension Plan:	A defined benefit pension plan that is used to provide pensions to the employees of more than one employer.
Net Pension Liability (NPL):	The liability of employers and non-employer contributing entities to employees for benefits provided through a defined benefit pension plan.

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Other Postemployment Benefits:	All postemployment benefits other than retirement income (such as death benefits, life insurance, disability, and long-term care) that are provided separately from a pension plan, as well as postemployment healthcare benefits, regardless of the manner in which they are provided. Other postemployment benefits do not include termination benefits.
Pension Plans:	Arrangements through which pensions are determined, assets dedicated for pensions are accumulated and managed and benefits are paid as they come due.
Pensions:	Retirement income and, if provided through a pension plan, postemployment benefits other than retirement income (such as death benefits, life insurance, and disability benefits). Pensions do not include postemployment healthcare benefits and termination benefits.
Plan Members:	Individuals that are covered under the terms of a pension plan. Plan members generally include (1) employees in active service (active plan members) and (2) terminated employees who have accumulated benefits but are not yet receiving them and retirees or their beneficiaries currently receiving benefits (inactive plan members).
Postemployment:	The period after employment.
Postemployment Benefit Changes:	Adjustments to the pension of an inactive employee.
Postemployment Healthcare Benefits:	Medical, dental, vision, and other health-related benefits paid subsequent to the termination of employment.
Projected Benefit Payments:	All benefits estimated to be payable through the pension plan to current active and inactive employees as a result of their past service and their expected future service.
Public Employee Retirement System:	A special-purpose government that administers one or more pension plans; also may administer other types of employee benefit plans, including postemployment healthcare plans and deferred compensation plans.
Real Rate of Return:	The rate of return on an investment after adjustment to eliminate inflation.
Service Costs:	The portions of the actuarial present value of projected benefit payments that are attributed to valuation years.
Single-Employer Defined Benefit Pension Plan (Single-Employer Pension Plan):	A defined benefit pension plan that is used to provide pensions to employees of only one employer.
Termination Benefits:	Inducements offered by employers to active employees to hasten the termination of services, or payments made in consequence of the early termination of services. Termination benefits include early-retirement incentives, severance benefits, and other termination-related benefits.
Total Pension Liability (TPL):	The portion of the actuarial present value of projected benefit payments that is attributed to past periods of employee service in conformity with the requirements of Statement 67.