

**FRESNO COUNTY EMPLOYEES' RETIREMENT ASSOCIATION (FCERA)
ADMINISTRATIVE PROCEEDINGS AND APPEALS TO THE BOARD POLICY**

I. PURPOSE OF THIS POLICY

- 1) Assuring that FCERA members and beneficiaries receive the correct benefits due to them under the law often requires the Board to make certain findings of fact and decisions. For example, a member may be granted a disability retirement only after proving to the Board's satisfaction that the member is "permanently incapacitated physically or mentally for the performance of his [or her] duties." See Gov't Code §31724.

Additionally, from time to time, members, beneficiaries or participating employers question the Board or FCERA staff's determination of the law and seek the Board's review of that determination.

- 2) This Policy provides an administrative framework for assisting the Board in making the factual findings necessary to administer FCERA in compliance with law, and to resolve claims by members, beneficiaries or participating employers, in a manner that is transparent and efficient and that provides the impacted parties a fair opportunity to be heard, before the Board makes its final decision.
- 3) This Policy is designed to be consistent with applicable law, but in the event there is any inconsistency between this Policy and the law, the law shall govern.

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

- 1) Parties seeking relief from FCERA must comply with the procedures described in this Policy before filing any legal action in court, unless the Board, in its sole discretion, excuses that party from the requirements of the Policy.

III. INITIAL DETERMINATION AND APPEAL PROCESS

- 1) Initial Determinations by the Administrator
 - a) Delegation of Authority to Administrator. The Board delegates to the Administrator full authority to make all initial determinations regarding claims by members, beneficiaries or participating employers. The Administrator shall consult with appropriate outside advisors as the Administrator deems necessary.
 - b) Input from Impacted Parties. If the relief sought by a party is expected to impact the rights of another party or parties, the Administrator shall make all reasonable efforts to inform all such potentially impacted parties and obtain input from them.

- c) Granting Relief in Matters with \$5,000 or Less at Issue. If the Administrator determines that a member, beneficiary or participating employer is entitled to the relief they seek and the amount at issue is \$5,000 or less, or the claim may be compromised for \$5,000 or less, the Administrator is delegated authority to grant that relief with the terms of the resolution included on the next consent agenda notifying the Board and Public. If no person requests Board review within 30 days after the date of the Administrator's written determination, then the Administrator's determination shall be deemed a final decision of the Board.
 - d) Granting Relief in Matters with More than \$5,000 at Issue. If the Administrator determines that a member, beneficiary or participating employer is entitled to the relief they seek and the amount at issue is greater than \$5,000, or a compromise would be greater than \$5,000, the Administrator shall present his or her recommendation to the Board on an agenda item at a regularly scheduled Board meeting, for discussion and appropriate action by the Board. The Board may then take any appropriate action within its authority.
 - e) Denying Relief – Any Amount. If the Administrator determines that a member, beneficiary or participating employer is not entitled to the relief they seek, the member, beneficiary or participating employer may either accept the Administrator's determination or appeal that determination to the Board, by requesting Board review within 30 days after the date of the Administrator's written determination.
- 2) Board Consideration of Appeals from Administrative Determinations
- a) Appeals as Agenda Items. Appeals to the Board from administrative determinations ordinarily will be agendized for open session at a regularly scheduled Board meeting. The Administrator may, however, agendize a matter for closed session in the event the matters to be discussed are expected to include information that is protected from public disclosure by Government Code section 31532, or other applicable law. Further, nothing in this Policy shall be construed to limit the Board's ability to hold any other closed session that is authorized by the Ralph M. Brown Act, Government Code sections 54950 *et seq.*
 - b) Legal Issues. In the event that the Board determines, in consultation with the Administrator and counsel, that the issues raised by the appeal either (a) raise purely questions of statutory construction, or (b) there are no material factual disputes, the Board may make a decision on the appeal without developing any factual record, beyond the documents and oral presentations submitted by the Administrator and the appealing party.

- c) Factual Determinations. If the Board determines that the appeal raises material factual issues, the Board may, in consultation with the Administrator and counsel, determine a fair process for developing a factual record. Such processes may include, but are not limited to: (1) referring the matter to a referee to conduct an evidentiary hearing and make recommendations to the Board, as the Board requests, (2) holding an evidentiary hearing before the Board, or (3) taking evidence in a more informal process (e.g., receiving sworn declarations), when such an informal process is deemed appropriate by the Board, under all existing circumstances.
- d) Joinder of Parties. In the event a decision is expected to impact more than just the appealing party, all other impacted parties shall be given a reasonable opportunity to participate in the decision-making process, to the extent practicable.
- e) Quorum. Pursuant to FCERA's Bylaws, five members of the Board constitute a quorum, and a majority vote of the quorum present at the time of voting shall govern the decisions on appeals to the Board, unless otherwise provided by law, FCERA's Regulations or Policies, or the Board's Bylaws. A tie vote results in a failure to find in favor of the applicant and constitutes a denial of the appeal, or that portion of the appeal on which the vote is taken.

IV. PROCEDURES AND RULES FOR ALL EVIDENTIARY HEARINGS

1) Hearing Forum

- a) The Board, in its sole discretion, may hold a hearing itself or it may delegate the matter to a referee. *See Gov't Code § 31533.*
- b) A referee must be either a Board member or an active member of the State Bar of California. If a referee holds the hearing, after the hearing the referee shall transmit to the Board, in writing, his or her proposed findings of fact and recommended decision. *See Gov't Code § 31534.* Upon receiving the proposed findings of fact and the recommendations of the referee, the Board may:
 - i. Approve and adopt the proposed findings and the recommendations of the referee; or
 - ii. Require a transcript or summary of all the testimony, plus all other evidence received by the referee. Upon the receipt thereof the Board shall take such action as in its opinion is indicated by such evidence; or
 - iii. Refer the matter back with instructions to the referee for further proceedings; or
 - iv. Set the matter for hearing before itself. At such hearing the Board shall hear and decide the matter as if it had not been referred to the referee.

2) Board Members' Participation in Decision

- a) A member of the Board not in attendance during all portions of a hearing held by the Board shall not participate in the determination by the Board unless: (1) a quorum of members who attended the full hearing is not available, (2) the member has read a transcript (or listened to an audio recording) of that portion of the hearing during which he or she was not in attendance, and (3) the member has stated on the record that he or she has undertaken and completed such review.

3) Records

- a) Each hearing shall be listed in the records of the Board under the name of the member, beneficiary or participating employer, for or through whom benefits, rights, and privileges are claimed, whether such person or entity is the applicant or not. Reference to the hearing shall be by the name of the appellant.

4) Representation by Legal Counsel

- a) Any applicant or party shall be entitled to be represented by an attorney duly licensed to practice in the State of California at any hearing, at the sole expense of the applicant or party. After an attorney appears at a hearing on behalf of an applicant or party, or after the filing of written notice that the attorney is appearing on behalf of the applicant or party, all notices and other papers shall thereafter be served solely upon the attorney.

5) Stipulations

- a) No stipulation, agreement, understanding, or omission on behalf of the County of Fresno or any member District, or by an officer, employee or agent of the County of Fresno or any member District in a proceeding to which neither the Board nor the Association is a party, shall be binding upon the Board or the Association, unless the stipulation, agreement, understanding, act or omission has been approved by the Board through a duly adopted motion which has been recorded in the official minutes of the Board.

6) Notice of Hearing

- a) The hearing shall be set by the Administrator at the earliest mutually agreeable date and the Administrator shall deliver or mail, by certified mail, return receipt requested, a notice of hearing to the applicant and all other parties at least 45 days prior to the hearing, unless the parties agree to a shorter notice period.

7) Postponements

- a) The Administrator may for good cause postpone a hearing to a later date with the consent of all parties. In the event all parties do not consent to a postponement, the Administrator shall refer the matter to the Board or referee for its, his, or her decision. If the Board is holding the hearing and a Board meeting is not scheduled prior to the hearing, the Administrator shall refer the matter to the Chair for a decision.

8) Recording of Hearing

- a) The proceedings of all hearings shall be recorded by audio recording or transcription, the cost of which shall be borne by FCERA.

9) Witness Fees

- a) Witness fees, mileage and expenses shall be determined between the calling party and the witness, and shall be paid by the calling party in accordance with applicable law. *See* Gov. Code, § 31535.

10) Presiding Officer

- a) The Chair or referee shall preside over the hearing and shall exercise reasonable control over the proceedings. In addition to other duties, the Chair or referee shall rule on the admissibility of evidence and shall order a party to yield the floor when the allotted time has been consumed or when the orderly and expeditious conduct of the hearing requires it. The Chair or referee may permit such questioning and other participation in the proceedings by the Board members or others as will best serve the purposes of the hearing.

11) Subpoenas

- a) Upon the application of any party to a hearing for the issuance of a subpoena to appear and testify, or a subpoena *duces tecum*, in accordance with the provisions of Government Code section 31535, the Chair or Board Secretary is authorized to issue and shall issue the subpoena in the name of the Board. The cost shall be borne by the requesting party.
- b) When a referee conducts a hearing, the referee shall have full delegation of the Board's subpoena power. *See* Gov't Code §§ 31533 and 31535.
- c) In lieu of a subpoena, an applicant or other party to a proceeding may be required to appear and/or produce documents at the hearing through service of a notice to that effect upon the applicant or other party, or their respective attorney(s).

- d) Any opposition to the production of the records requested in a subpoena must be made in writing to the Chair or referee and delivered prior to the return date of the subpoena, based on one or more of the following grounds with supporting statements under oath or affirmation:
- i. Compliance will be unduly burdensome or against public policy.
 - ii. The items or testimony subpoenaed are privileged by law.
 - iii. The items or testimony subpoenaed are not relevant or material to the proceedings.
 - iv. The items subpoenaed have not been described with sufficient clarity to enable the witness to comply.
- e) The Chair or referee shall rule on any such opposition before ruling on continuing or beginning a proceeding.

12) Burden of Proof and of Producing Evidence

- a) In all cases, the party seeking relief from FCERA shall have the burden of proof and the burden of producing evidence at the hearing.

13) Rules of Evidence

- a) The hearing need not be conducted according to technical rules of evidence relating to evidence and witnesses. Any relevant evidence shall be admitted if it is the sort of evidence on which responsible persons are accustomed to rely in the conduct of serious affairs, regardless of the existence of any common law or statutory rule which might make improper the admission of the evidence over objection in civil actions. Hearsay evidence may be used for the purpose of supplementing or explaining any direct evidence, but shall not be sufficient in itself to support a finding unless it would be admissible over objection in civil actions.
- b) Oral evidence shall be taken only on oath or affirmation.
- c) Each party shall have the right to call and examine witnesses, to introduce exhibits and to cross-examine opposing witnesses in any matter relevant to the issues, as reasonably permitted by the Board or the referee. If the applicant or any other party does not testify on his or her own behalf, he or she may be called and examined by another party as if under cross-examination.

14) Order of Business for Hearing

- a) Unless the Chair or referee rules that it is not necessary to so proceed in a particular hearing, all hearings shall proceed in the following manner:

- i. The Chair or referee shall read the title of the case, state the relief sought and ask for appearances for all parties. If the Board is holding the hearing, this information shall be recorded in the minutes of the Board. The Chair or referee shall inquire if all parties are ready to proceed.
- ii. If all parties are ready to proceed, the Chair or referee shall mark for identification all papers in the official file of the hearing, which should include:
 - The application for the benefit, right, privilege or claim.
 - The notice to the applicant of the date set for hearing, with proof of service.
 - Other documents in the official files of FCERA.
- iii. The parties will be given the opportunity to make opening statements.
- iv. The person or entity seeking relief from FCERA shall present his, her or its evidence, and thereupon rest its case.
- v. Each other party shall then present his, her, or its evidence, in the order determined by the Chair or referee, and thereupon rest its case.
- vi. Each party shall be allowed to cross-examine witnesses.
- vii. Each party shall be entitled to present rebuttal evidence.
- viii. Upon the conclusion of all testimony, the Chair or referee shall inquire if all parties are ready to submit the matter for decision. The representative for each party shall be permitted to briefly summarize the evidence.
- ix. The hearing shall then be closed and the matter submitted for decision. If further documentary evidence is to be filed, the Chair or referee may allow time for filing and serving the documentary evidence, and may order that the matter will be deemed submitted after such period unless any party objects to the documentary evidence within ten days after it is filed. Copies of the documentary evidence shall be served on all parties who appeared at the hearing. The Chair or referee may, but need not, set a schedule for closing briefing, if any party requests such briefing, or the Chair or referee believes that such briefing is appropriate.

15) Service of Notice

- a) Any notice shall be deemed sufficient when it is delivered in person to the person or persons to whom it is directed, or when mailed by certified mail, return receipt requested, addressed to the last known address of the addressee or addressees.

16) Continuances by the Board or Referee

- a) The Board or a referee may on its, his, or her own motion continue a hearing to another time and place, order additional evidence to be presented, order additional examinations of the member, or allow other evidence to be gathered and presented, as it, he or she deems appropriate. Provided, however, that if such an order by a referee continues the hearing by more than 30 days or requires the expenditure of funds by FCERA, the referee's order shall be placed on the Board's next open meeting agenda for the Board's consideration, in which case the Board may overrule the referee's order, in its sole discretion.

17) Time for Decision of the Board

- a) If the Board holds the hearing itself, the Board shall render its decision by the second regular meeting after the matter is submitted. If a referee holds the hearing, the Board shall render its decision by the second regular meeting after the referee submits his or her proposed findings of fact and recommended decision.
- b) In disability matters, the Board shall deliberate in closed session. In matters other than disability applications, the Board will ordinarily deliberate in open session, unless there is a basis to deliberate in closed session under the Ralph M. Brown Act, and the Board determines that such closed session deliberation is appropriate.

18) Separation of Advocacy and Counseling Functions and Avoidance of Conflicts

- a) No attorney shall serve as the advocate for FCERA staff's position at a hearing (whether before the Board or a referee) and also serve as advice counsel to the Board, with respect to that matter.
- b) No referee or Board member may participate in the adjudication of a claim, if he or she has a material financial interest in the outcome of that claim or any other conflict of interest that would compromise the impartiality of such Board member or referee.
- c) If any party to a hearing believes that a referee or Board member is unable to be impartial, that party must raise its objection to that Board member or referee's participation in the adjudication of the claim at the earliest possible time, for consideration by the referee or the Board, as appropriate. If not raised before the commencement of the hearing, the objection shall be deemed waived.
- d) Board members shall seek guidance of counsel if they believe there is any question whether they have a material financial interest in the outcome of the claim or any other conflict of interest that might compromise their impartiality.

19) Prohibition of Ex Parte Contacts

- a) No party (including the Administrator or any other FCERA staff member) to a hearing, or that party's counsel, may engage in any ex parte contact with any Board member, a referee or the Board's advice counsel, regarding the substantive matter(s) pending before the Board or the referee.

20) Notice of Decision

- a) Written notice of the decision of the Board shall be delivered or mailed to the applicant by certified mail, return receipt requested, and to each other party, or their respective attorneys, at his, her, or its last known address within 10 days following the date the decision is rendered. Notice of denial of disability application shall be also mailed to the appointing authority.

21) Petition for Rehearing

- a) For good cause shown, the Board may grant a petition for rehearing upon motion for rehearing made by any party within 10 days after the decision of the Board is served on the party.

22) Judicial Review

- a) Judicial review of the Board's decision shall be governed by Code of Civil Procedure section 1094.5 although in some cases the standard of review in superior court will be "abuse of discretion". Any petition for judicial review must be filed no later than the ninetieth (90th) day following the date on which the Board's decision becomes final. If no petition for rehearing is filed within ten (10) days after the Board's decision is served on the party, the decision of the Board becomes final at the close of business on the tenth (10th) day after such service. If a timely petition for a rehearing is filed, the Board's decision becomes final on the date that the Board denies a petition for rehearing. The time for filing a petition for judicial review shall be extended under the provisions of Code of Civil Procedure section 1094.6, subdivision (d), if the petitioner files a timely request for the record.

23) Record of Proceedings: Charges and Content

- a) Upon written request by any party and that party's written agreement for payment of the fee for the reporter's transcript, plus costs as determined by the Administrator for preparing and certifying other portions of the record, the Administrator shall have prepared and delivered to the requesting party the complete record of the proceedings. Payment must be made by cash or certified check at the time the record is made available.

V. Additional PROCEDURES AND Rules For Disability Applications

- 1) Cost of Disability Application to be Borne by Applicant
 - a) Upon filing an application for disability retirement, the applicant shall provide the Administrator with a copy of a medical or psychological report prepared by a licensed physician or psychologist stating that the applicant is permanently disabled from the performance of the duties of his or her position and setting forth the causes for the disability. The application will not be deemed complete for processing until the required medical report is submitted with the application. The expense for this report shall be borne by the applicant.
 - b) All examinations, medical reports and other costs incurred at the request of the applicant in preparation of an application for disability retirement and the hearing process shall be borne by the applicant.
- 2) Independent Examinations
 - a) The Administrator may, but need not, require that an applicant for disability retirement submit to one or more examinations to determine the existence of the disability and the causes of that disability. It is the Board's policy that the Administrator shall have broad discretion in making the initial recommendation as to whether one or more independent examinations are necessary, based on all of the facts and circumstances in a particular case.
 - b) The reasonable cost of the examination(s) and reasonable expenses of the applicant in attending the examination shall be borne by the Association.
 - c) The applicant shall submit to any examination required by the Administrator. Refusal of any applicant to submit to an examination may result in the denial of the application.
 - d) Unless good cause appears therefor, a hearing date shall not be set unless all examinations required pursuant to this section have been completed and the results have been provided to the Administrator.
- 3) Release of Information
 - a) An applicant for disability retirement benefits shall execute and deliver to the Administrator, in the form provided, a written consent for release of medical and/or psychological and/or psychiatric records and information and, in addition, a written consent for release of miscellaneous information and records such as personnel and military records, investigatory records, vocational rehabilitation records, and any other records or information which reasonably may lead to relevant information.

- b) An applicant for death benefits shall give written consent for the release of medical records and miscellaneous information concerning the deceased member by executing forms provided by the Administrator.

4) Inquiries into Applicant's Conduct

- a) To assist in making a recommendation or determination and assure that the disability is not due to intemperate use of alcoholic liquor, or drugs, willful misconduct, or violation of law on the part of the member, the Board, referee, Administrator or FCERA hearing advocate may question the applicant, a medical examiner or other witnesses about relevant habits or conduct of the applicant. See Gov't Code, §§ 31726 and 31726.5.

5) Administrative Recommendations

- a) When, in the opinion of the Administrator, there is a strong showing that the application should be granted, based on the medical reports and other relevant documents, the Administrator may make a recommendation to the Board to grant benefits without a hearing. The recommendation shall be in writing and shall summarize the evidence in support of the recommendation. If the Administrator has determined that there is a strong showing that the application should be granted, without having first required the applicant to submit to an independent examination, the Administrator shall provide a written explanation of why an independent examination was not necessary and all steps that were taken to determine that there is a strong showing that the application should be granted. Upon receipt of the recommendation of the Administrator, the Board may do any of the following:
 - i. Accept a recommendation to grant the benefit without a hearing.
 - ii. Conditionally reject the application, subject to the Board's receipt of additional evidence of disability. For example, but without limitation, if the Administrator did not initially require an independent examination, the Board may require an independent examination.
 - iii. Reject the recommendation and direct the Administrator to notify the applicant that the application will be denied unless the applicant requests a hearing. The board may (but need not) state its basis for rejection of the recommendation.
- b) When, in the opinion of the Administrator, there is not a strong showing that the application should be granted, the Administrator shall recommend that the application be denied, subject to the member's right to request a hearing. Upon receipt of the recommendation of the Administrator, the Board may do any of the following:

- i. Accept a recommendation and deny the benefit, subject to the members' right to request a hearing.
 - ii. Conditionally reject the application, subject to the Board's receipt of additional evidence of disability. For example, but without limitation, if the Administrator did not initially require an independent examination, the Board may require an independent examination.
 - iii. Reject the recommendation and grant the benefit.
 - c) If the Board determines that a member who has applied for a service-connected disability has satisfied the requirements for a non-service connected disability, but not for a service-connected disability, the Board may grant the non-service connected disability (if the member applies for a non-service connected disability) and direct the Administrator to notify the applicant that the Board's action is final, unless the applicant requests a hearing on the question of service-connection. See Gov't Code §31725.8.
- 6) Notice of Board's Initial Action and Right to Request a Hearing
- a) Within ten (10) days after the Board's initial action, the Administrator shall notify the applicant in writing, by certified mail, at the latest address shown in the application, of the Board's action. If the Board denies in whole or in part any benefit sought in the application, the notice shall advise the applicant of his or her right to request a hearing.
 - b) An applicant may request a hearing by filing with the Administrator a Request for Hearing, the form for which shall be included in the Administrator's notice. The Request shall be in writing and must be personally signed by the applicant or applicant's attorney. To be timely, a Request must be received by the Administrator no later than thirty (30) days after the date the notice is mailed to the applicant.
 - c) If the applicant fails to request a hearing, the Board's initial action shall be deemed a decision to deny benefits, and shall be deemed final as of the deadline for the applicant to file the request for hearing. The Administrator shall then promptly mail notice of the decision to the employer as provided in Government Code section 31725.
- 7) Physicians' Reports as Evidence
- a) The Board favors the production of medical evidence in the form of written reports. These reports should include:
 - i. History of the injury or illness;
 - ii. The patients' complaints'

- iii. Source of all facts set forth in the history and complaints;
 - iv. Findings on examination;
 - v. Opinion as to the extent of disability and working ability;
 - vi. Cause of disability;
 - vii. Medical treatment indicated;
 - viii. Opinion as to whether the patient's disability is due, so far as the examination discloses, to intemperate use of alcoholic liquor or drugs, or willful misconduct or violation of law; and
 - ix. The reason or reasons for these opinions.
- 8) Cross-Examination of Physician
- a) The party submitting a physician's report shall at his, her or its own expense cause the physician to be present at the hearing for cross-examination, unless the referee (if the hearing is before a referee) or the Board (if the hearing is before the Board) determines that good cause exists to excuse the party from this rule. If a party seeks an exemption from the requirement of the physician's personal appearance, it must request that exemption at least 30 days in advance of the hearing to allow for argument and a decision by the referee or the Board in advance of the hearing. The referee or the Board may, but need not, condition any such exemption on the physician submitting to a deposition. *See Gov't Code §31535.*
 - b) Nothing in this rule shall preclude a party from introducing a medical or other business record solely for impeachment purposes, or for refreshing a witness' recollection, without producing the author of the record for cross-examination. Impeachment may be allowed under this special provision only to contradict a witness' testimony about a fact, event, condition, etc.; refreshment may be allowed to help establish a fact, event, condition, etc., to which a witness testifies he or she cannot recall.
- 9) Determinations at Hearing
- a) At a hearing for disability retirement, the Board or referee shall make the following determinations:
 - i. First, the Board or referee shall determine whether the member is permanently incapacitated for the performance of duty.

- ii. Second, if a service-connected disability is sought, the Board or referee shall determine whether the member's incapacity is a result of injury or disease arising out of and in the course of his or her employment, and such employment contributed substantially to the incapacity.
 - iii. Third, if a service-connected disability is sought based upon the operation of a statutory presumption, the Board or referee shall determine whether presumption has been rebutted.
 - iv. Fourth, if there is a dispute regarding the effective date of retirement, the Board or referee shall determine the effective date of retirement.
- b) If the hearing is held by a referee, the referee shall submit his or her proposed findings of fact and recommended decision to the Board within 60 days after the matter is submitted. The referee shall serve copies of the proposed findings of fact and recommendations on the parties, who shall have 10 days to submit written objections thereto. The parties' written objections, if any, shall be included in the record to be submitted to the Board.

10) Effect of Action Upon Later Applications

- a) Except as otherwise provided in this Section, action by the Board granting or denying in whole or in part any application for disability retirement shall be deemed to be a final and conclusive determination of any and all issues raised by the application which were either presented at the hearing or which could, with the exercise of reasonable diligence, have been presented at the hearing.
- b) However, no applicant whose application for disability retirement has been denied by the Board, who thereafter returns to service, shall be precluded from filing a new application which asserts as a basis for the application circumstances existing or known at the time of the denial of the first application in combination with circumstances which have arisen or become known after denial of the prior application.

VI. Policy History

- a) This policy was adopted by the Board on January 1, 2004.
- b) This policy was reviewed and modified by the Board on August 18, 2004, December 15, 2010, and October 7, 2015.
- c) The Board shall review this policy at least every three years to ensure that it remains relevant and appropriate.

VII. Secretary's Certificate

I, Donald C. Kendig, the duly appointed Secretary of the Fresno County Employees' Retirement Association, hereby certify the adoption of this Policy.

October 7, 2015

Date of Action:

Donald C. Kendig

By: Retirement Administrator