



SMMUSD Financial Oversight Committee Meeting Minutes

Date: Thursday, February 24, 2022

Time: 6:00 pm to 8:00 pm

Location: Zoom

<https://drive.google.com/file/d/1sNp3A7xPaHErOog9VrqqxPE7D2q5TDud/view>

I. Call to Order

6:05 pm

Committee Members: JW Beekman
Matthew Covington
Seth Jacobson
Payal Maniar
Michael Rotgin

Ryan Chin
Matthew Crawford
Michael Kremer
Renu Mevasse

Staff: Melody Canady
David Chiang
Bonnie Kung

Gerardo Cruz
Gail Pinsker

Board Liaison: Craig Foster

Jon Kean

Absent: Alex Farivar
Keith Coleman

Shawn Landres
Zoe Pollack, Malibu student rep.

Public: B. Onofre – departed @ 6:30 pm

II. Welcome New Member (Ryan Chin)

6:05 pm

The committee welcomed new member Mr. Chin.

III. Approval of Agenda

6:07 pm

A motion was made by Mr. Kremer and seconded by Mr. Jacobson to approve the meeting agenda.

AYES: Nine (9) (Mr. Beekman, Mr. Chin, Mr. Covington, Mr. Crawford, Mr. Jacobson, Mr. Kremer, Ms. Maniar, Ms. Mevasse, Mr. Rotgin)

STUDENT ADVISORY VOTES: None (0)

NOES: None (0)

ABSENT: Two (2) (Mr. Farivar, Mr. Landres)

ABSTAIN: None (0)

IV. Approval of FOC Meeting Minutes

6:09 pm

A motion was made by Mr. Rotgin and seconded by Mr. Beekman to approve the January 6, 2022 meeting minutes.

AYES: Seven (7) (Mr. Beekman, Mr. Covington, Mr. Jacobson, Mr. Kremer, Ms. Maniar, Ms. Mevasse, Mr. Rotgin)

STUDENT ADVISORY VOTES: None (0)

NOES: None (0)

ABSENT: Two (2) (Mr. Farivar, Mr. Landres)

ABSTAIN: Two (2) (Mr. Chin, Mr. Crawford)

Mr. Chin and Mr. Crawford abstained as they were not present at the January 6, 2022 meeting.

V. Discussion/Action Items

A. Update on Debt Policy

6:11 pm

Mr. Kremer reported that the subcommittee made final suggestions to the debt policy, which were accepted by Staff. The committee reviewed the suggested edits on page 4 under section G of Refunding and Restructuring.

The updated debt policy with the amendments may be found at the end of these minutes.

A motion was made by Mr. Crawford and seconded by Mr. Rotgin to recommend the Board of Education adopt the Debt Policy as amended.

AYES: Eight (8) (Mr. Beekman, Mr. Covington, Mr. Crawford, Mr. Jacobson, Mr. Kremer, Ms. Maniar, Ms. Mevasse, Mr. Rotgin)

STUDENT ADVISORY VOTES: None (0)

NOES: None (0)

ABSENT: Two (2) (Mr. Farivar, Mr. Landres)

ABSTAIN: One (1) (Mr. Chin)

B. FOC mid-year progress report to the Board

6:21 pm

The committee discussed and reviewed the mid-year progress report to the Board. Each subcommittee provided an overview of their respective updates.

The Measure R Reporting and Process Review subcommittee reported that they are currently working on their recommendations and creating a template for an expanded explanation of the items funded by Measure R. The report will be an informational piece to the Measure R Plan that will be presented to the FOC in March. The Financial Communication and Reporting subcommittee reported that they were developing a calendar of annual fiscal events with Ms. Pinsker to make specific recommendations for the items that may require more clarity.

The updated mid-year progress report may be found at the end of these minutes.

A motion was made by Ms. Maniar and seconded by Mr. Kremer to approve the amended mid-year progress report to be submitted to the Board of Education.

AYES: Nine (9) (Mr. Beekman, Mr. Chin, Mr. Covington, Mr. Crawford, Mr. Jacobson, Mr. Kremer, Ms. Maniar, Ms. Mevasse, Mr. Rotgin)

STUDENT ADVISORY VOTES: None (0)

NOES: None (0)

ABSENT: Two (2) (Mr. Farivar, Mr. Landres)

ABSTAIN: None (0)

C. Meeting start time and the March meeting

6:38 pm

The committee discussed the possibility of an earlier start time. When meetings are anticipated to run longer, the start time will be moved to 5:30 pm. The March 23, 2022 meeting will begin at 5:30 pm as it is anticipated to be a longer meeting.

VI. Ad hoc Subcommittee Report

6:43 pm

Subcommittee updates were given during item V.B. FOC mid-year progress report to the Board. The committee determined Mr. Chin's membership in the Budget Recommendations and Measure R Reporting and Process Review subcommittees.

A. Budget Recommendations: *Mr. Jacobson, Mr. Covington, Mr. Beekman, Mr. Rotgin, Mr. Chin*

B. Tax Revenue and Assessed Valuation: *Mr. Farivar, Mr. Crawford, Mr. Kremer, Mr. Beekman*

C. Bond Oversight: *Mr. Kremer, Mr. Crawford, Ms. Mevasse, Mr. Rotgin*

D. Measure R Reporting and Process Review: *Mr. Crawford, Mr. Landres, Ms. Maniar, Mr. Chin*

E. Financial Communication and Reporting: *Mr. Landres, Ms. Maniar, Ms. Mevasse, Mr. Jacobson*

Mr. Cruz noted that the district's financial information is readily available on the website in comparison to other districts.

F. Nomination: *Mr. Covington, Mr. Kremer, Ms. Maniar, Mr. Farivar*

VII. Receive and File (Limited Discussion)

6:48 pm

A. CERBT GASB 75 Schedule of Changes in Fiduciary Net Position by Employer Report for June 30, 2021

<https://www.calpers.ca.gov/docs/forms-publications/gasb-75-schedule-changes-fiduciary-net-position-2021.pdf>

B. CERBT Account Update – 12/31/21

- C. CERBT Quarterly Statement ending December 31, 2021
- D. CERBT Asset Class Fact Sheets – 9/30/21
<https://www.smmusd.org/cms/lib/CA50000164/Centricity/domain/300/finreports/CERBTAssetClassFactSheets09302021.pdf>
- E. School Services of California – January 7, 2022 “*Ask SSC...School Closure Options Amidst the COVID-19 Surge*”

VIII. Public Comments None

IX. Committee Comments

6:48 pm Mr. Kean inquired about the board policy regarding the district’s Reserves. Ms. Canady replied that it has been in discussion but will be brought up at a later time.

X. Next Meeting: Wednesday, March 23, 2022 - Zoom

XI. Adjournment: The meeting adjourned at 6:51 p.m.

Santa Monica-Malibu USD | BP 3470 Business and Noninstructional Operations

Debt Issuance and Management

Purpose of Policy. The Board of Education is committed to long-term capital and financial planning and recognizes that the issuance of debt is a key source for funding the improvement and maintenance of school facilities and managing cash flow. Any debt issued by the district shall be consistent with law and this policy. This policy provides written guidelines for the issuance of indebtedness by the Santa Monica-Malibu Unified School District in satisfaction of the requirements of S.B. 1029, codified as part of Government Code Section 8855.

Administration of Policy by District Officials. The District's Assistant Superintendent of Business & Fiscal Services is the designated administrator of this policy. Proposed debt issuances and related considerations presented to the Board for authorization shall be in compliance with this policy. Signing authority for all final debt documentation and certifications is vested in the District Superintendent, the Assistant Superintendent of Business & Fiscal Services, the President of the Board, and any other officer identified by the District Board with authority to execute said documentation.

Annual Review of Policy. The Assistant Superintendent of Business & Fiscal Services will review this Policy by June 30 of each year for the purpose of identifying necessary or advisable amendments, if any, due to changes in law, new guidelines or recommendations of other relevant authorities with respect to debt management policies, or in order to make clarifying or other desired changes. If necessary or advisable amendments are identified, then the Assistant Superintendent of Business & Fiscal Services will submit an updated Policy to the Board for consideration.

Goals

This Policy provides a framework for debt management and capital planning by the District. This Policy has been developed to meet the following goals:

1. Identifying the purposes for which the debt proceeds may be used.
2. Identifying the types of debt that may be issued.
3. Describing the relationship of the debt to, and integration with, the District's capital improvement program or budget.
4. Establishing debt policy goals related to the District's planning goals and objectives.
5. Implementing internal control procedures to ensure that the proceeds of the proposed debt issuance will be directed to the intended use upon completion of the issuance.
6. Maintaining full, complete and timely financial disclosure and reporting.
7. Ensuring compliance with applicable State and Federal laws.

Purposes for Which Debt Proceeds May be Used

The laws of the State of California (the "State") authorize the District to incur debt to make lease payments, contract debt, borrow money, and issue bonds for school improvement projects. The District is authorized to contract debt to acquire, construct, reconstruct, rehabilitate, replace, improve, extend, enlarge, and equip such projects; to refund existing debt; or to provide for cash flow needs.

Section 18 of Article XVI of the State Constitution contains the "debt limitation" formula applicable to the District.

There are a number of State laws that govern the issuance of general obligation bonds ("GO Bonds") by school districts. Sections 1(b)(2) (Proposition 46) and 1(b)(3) of Article XIII A (Proposition 39) of the State Constitution allow the District to issue GO Bonds. The statutory authority for issuing GO Bonds is contained in Education Code Section 15000 et seq. Additional provisions applicable only to Proposition 39 GO Bonds are contained in Education Code Section 15264 et seq. An alternative procedure for issuing GO Bonds is also available in Government Code Section 53506 et seq.

The statutory authority for issuing Tax and Revenue Anticipation Notes ("TRANs") is contained in Government Code Section 53850 et seq. Authority for lease financings is found in Education Code Section 17455 et seq. and additional authority is contained in Education Code Sections 17400 et seq., 17430 et seq. and 17450 et seq. The District may also issue Mello-Roos bonds pursuant to Government Code Section 53311 et seq.

The District may deem it necessary to issue TRANs to finance cash flow requirements under certain conditions such as when there is a projected negative cash position in anticipation of revenues to come from State or other local sources. Such cash flow borrowing must be payable from taxes, income, revenue, cash receipts and other moneys attributable to the fiscal year in which the debt is issued.

General operating costs include, but are not limited to, those items normally funded in the District's annual operating budget.

The District's Superintendent, or designee, will review potential financing methods to determine which method is most prudent for the District. Potential financing sources include, but are not limited to tax and revenue anticipation notes, temporary borrowing from the Los Angeles County Treasurer and Tax Collector, and internal temporary interfund borrowing.

[A] The District's Financial Oversight Committee (FOC) is an advisory committee to the Board. In connection with each financing and prior to Board action of said proposed financing, the FOC shall convene a meeting at which District staff presents the reasons for the proposed financing and related preliminary structuring details to the members of the FOC and the members of the FOC have an opportunity to comment on said financing. In advance of such meeting, the District staff shall provide the members of the FOC with adequate information to support the District staff's recommendations. The FOC's ~~Said~~ comments shall be communicated to the Board by District staff prior to Board action on the proposed financing. Decision-making power with respect to District financings, debt and related considerations are vested in the District Board.

Types of Debt That May be Issued

1. Short-Term Debt: The District may issue fixed-rate and/or variable rate short-term debt, which may include TRANs, when such instruments allow the District to meet its cash flow requirements. The District

may also issue bond anticipation notes ("BANs") to provide interim financing for bond projects that will ultimately be paid from GO Bonds.

[I] 2. Long-Term Debt: Debt issues may be used to finance essential capital facilities, projects and certain equipment where it is appropriate to spread the cost of the projects over more than one budget year. Long-term debt ~~should~~will not be used to fund District operations except in extraordinary circumstances.

Long term debt in the form of GO Bonds may be issued under Article XIII A of the State Constitution, either under Proposition 46, which requires approval by at least a two-thirds (66.67%) majority of voters, or Proposition 39, which requires approval by at least 55% of voters, subject to certain accountability requirements and additional restrictions.

GO Bond measures can be approved by voters on a District-wide basis, or, alternatively, GO Bond measures may be presented to voters within a School Facilities Improvement District (SFID) which has been formed by the District in accordance with State law for the purpose of financing facilities, improvements and equipment within the boundaries of the SFID. The District has formed two SFIDs: SFID No. 1 (Santa Monica Schools) and SFID No. 2 (Malibu Schools).

[B] GO Bonds issued pursuant to a Proposition 39 voter authorization may only be issued in compliance with the tax rate projection requirements (\$60/\$100K assessed value). The District's total outstanding GO Bond debt is limited to ~~and bonding capacity limitations (2.50%)~~ of the taxable assessed value within its boundaries as set forth in the Education Code. The District Board may determine to seek a waiver of bonding capacity in accordance with procedures set forth by State law.

The District may also enter into long-term leases and/or participate in the sale of certificates of participation or lease revenue bonds for public facilities, property, and equipment. These obligations do not constitute indebtedness under the state constitutional debt limitation and, therefore, do not require voter approval

[C] 3. Lease/Equipment Financing: Lease-purchase obligations or appropriation leases are a routine and appropriate means of financing capital equipment and certain capital facilities. The term of lease financings may be short-term or long-term but in either case shall not exceed the combined useful life of the projects financed with the proceeds thereof. Leases may be executed as privately placed leases and as leases executed in connection with certificate of participation or lease revenue bond financings. However, because lease obligations might impact general fund budget flexibility, the District shall have a goal of limiting aggregate annual payments on each-all long-term leases s to 3.0% of unrestricted general fund revenues. This goal shall not serve as a maximum or cap and the District may take into account considerations at the time of structuring each lease such as available and projected unrestricted reserves, projected revenues from all lawful sources, and the District's other outstanding general fund debt undertakings when finalizing the related debt service schedule. In addition, the feasibility of funding capital equipment with pay-as-you-go financing will be considered. The District will monitor the option of refinancing and prepaying outstanding general fund leases with the proceeds of voter-approved GO Bonds provided such refinancing is within the scope of the voter-approved bond measure and all other legal and contractual requirements can be satisfied.

[J] 4. Use of General Obligation Bonds: A significant portion of the District's capital projects are expected to be funded by GO Bond proceeds. Projects financed by the GO Bonds will be determined by the constraints of applicable law and the project list approved by voters. The District will structure each GO Bond issuance and related tax rate projection with the goal of projecting tax rates for bonds issued pursuant to a single bond measure to not exceed the highest tax rate identified to voters in the tax rate

statement provided as part of the ballot materials. However, there may be circumstances where the District determines at the time of GO Bond issuance that the projected tax rate will be in compliance with State law but that it may exceed the tax rate estimate presented to voters at the time of the bond election. In such case District staff shall identify to the Board prior to Board authorization of the bond issue the circumstances resulting in the higher tax rate projection, ~~and~~ the rationale for issuing the Bonds at said time and with said related tax rate projections, and an independent third-party analysis demonstrating a net financial benefit of the structure relative to alternative structures.

Relationship of Debt to and Integration with District's Capital Improvement Program or Budget

In evaluating financing options for capital projects, both short and long-term debt amortization will be evaluated when considering a debt issuance, along with the potential impact of debt service, and additional costs associated with new projects on the operating budget of the District. The cost of debt issued for major capital repairs or replacements may be judged against the potential cost of delaying such repairs or replacements.

District staff have responsibility for the planning and management of the District's capital improvement program subject to review and approval by the Board of Education. Staff will, as appropriate, supplement and revise any applicable Facilities Master Plan in keeping with the District's current needs for the acquisition, development and/or improvement of District's real estate and facilities. Such plans may include a summary of the estimated cost of each project, schedules for the projects, the expected quarterly cash requirements, and annual appropriations, in order for the projects to be completed.

Refunding and Restructuring

Periodic reviews of outstanding debt will be undertaken to identify opportunities to refinance and/or restructure outstanding debt. Economic refundings undertaken to reduce overall debt service requirements for cost savings will be considered when there is a net economic benefit of the refunding. Non-economic refundings undertaken for restructuring purposes may be considered to achieve objectives such as changing covenants, repayment or optional redemption provisions, and other identifiable benefits.

[G] A “current refunding” occurs when ~~tax-exempt~~ refunding bonds are issued 90 or fewer days before the optional redemption date of the refunded bonds. An “advance refunding” occurs when ~~tax-exempt~~ refunding bonds are issued 91 or more days in advance of the refunding bonds’ optional redemption date. In 2017, the IRS code was modified to preclude the issuance of tax-exempt bonds to advance refund existing bonds when there was previously a one-time exception. There is no limit on the number of times that bonds may be current refunded with tax-exempt bonds (which may be subject to a future change in federal tax law following the date of adoption or amendment of this Policy). The District may undertake current or advance refundings provided such refundings are in compliance with all applicable legal requirements at the time of issuance and otherwise consistent with the other provisions of this policy.

The District shall review a net present value (NPV) savings analysis of any proposed refunding of each maturity of the debt to be refinanced to make a determination regarding the cost-effectiveness of the proposed refunding. The District will proceed with an economic refunding of a maturity only when both of the requirements below are met. Refundings which do not meet these two requirements, but have the potential to achieve other financing objectives, will be considered on a case-by-case basis.

- 1) The projected NPV savings, expressed as a percentage of the par amount of refunded debt, are no less than three percent (3%) for a tax-exempt current refunding and five percent (5%) for a taxable or tax-exempt advance refunding.

The higher NPV savings threshold for an advance refunding takes into consideration the often one-time only nature of an advance refunding as well as the longer refunding escrow period wherein the escrow investment rate is usually less than the interest cost of the refunded debt, thereby creating negative arbitrage (cost of carry).

- 2) The refunding must be minimally efficient, with the projected NPV savings exceeding the amount of any negative arbitrage in the refunding escrow.

~~[D] In cases where a proposed refunding does not meet the criteria in 1) or 2) above, the District should conduct a sensitivity analysis to evaluate the likelihood of a future refunding providing similar savings to taxpayers. A determination of how high future interest rates can increase from current interest rates where the projected savings to taxpayers is identical in both analyses should be evaluated to determine the worthiness of proceeding with refunding certain maturities that do not meet objective 1). Future interest rates should be compared to a number of historical interest rate averages in this exercise.~~

Policy Goals Related to District's Planning Goals and Objectives

In following this Policy, the District shall pursue the following goals:

1. The District shall strive to fund capital improvements from voter-approved GO Bond issues to preserve the availability of its General Fund for District operating purposes and other purposes that cannot be funded by such bond issues.
2. To the extent applicable, the District shall endeavor to attain the best possible credit rating for each debt issue in order to reduce interest costs, within the context of preserving financial flexibility and meeting capital funding requirements.
3. The District shall take all practical precautions and proactive measures to avoid any financial decision that will negatively impact current credit ratings on existing or future debt issues.
4. The District shall, with respect to GO Bonds, remain mindful of its statutory debt limit in relation to assessed value growth within the school district and the tax burden needed to meet long-term capital requirements.
5. The District shall consider factors such as market conditions, District cash flow, and other legal considerations whether imposed by State or federal law including the anticipated spend-down of debt proceeds, among other factors, when timing the issuance of debt.
6. The District shall determine the amortization (maturity) schedule which will fit best within the overall debt structure of the District at the time the new debt is issued.
7. The District shall match the term of the issue to the useful lives of assets funded by that issue whenever practicable and economical, while considering repair and replacement costs of those assets to be incurred in future.
8. The District shall, when issuing debt, assess financial alternatives to include new and innovative financing approaches, including whenever feasible, categorical grants, revolving loans or other State/federal aid, so as to minimize the encroachment on the District's General Fund.

9. The District will examine and consider taxable or other financing structures authorized by federal tax law which may be or become available as alternatives to the issuance of traditional tax-exempt obligations, such as tax credit or tax subsidy obligations. Factors to examine and consider shall be whether the financing can achieve the same project objectives as other methods, whether the alternative results in lower financing costs than other financing methods and whether the alternative is expected to provide other benefits which are in the best financial interests of the District and its taxpayers. The analysis shall consider any additional risks and/or compliance costs of the alternative financing structure, including in the case of federal subsidy bonds, the partial reduction or full loss of the federal tax subsidy.

10. The District shall, when planning for the sizing and timing of debt issuance, consider its ability to expend the funds obtained in a timely, efficient and economical manner and in accordance with "spend-down" requirements of federal tax law for tax-exempt obligations, as applicable.

Internal Control Procedures for Issuance of Debt to Ensure Intended Use of Proceeds

1. Maturity of Debt: The duration of a debt issue shall be consistent, to the extent possible, with the economic or useful life of the improvement or asset that the issue is financing. In addition, the average life of tax-exempt financing shall not exceed 120% of the average life of the assets being financed. The District shall also consider the overall impact of the current and future debt burden of the financing when determining the duration of the debt issue.

2. Debt Structure:

A. GO Bonds:

i. **[H]** New Money Bond Issuances: For tax-exempt new money bond issuances, the District shall size the bond issuance consistent with the "spend-down" requirements of the Internal Revenue Code, taking into account unexpended proceeds of prior issuances at the time an issue is sized, and within any limits approved by the District's voters. ~~In considering such~~ if there will be unspent bond proceeds of another issue on hand ~~at the time of the issuance of a new proposed issue~~, the District shall examine the spend down expectations and legal requirements applicable to the prior issue to ensure continued compliance prior to issuance of the proposed issue. To the extent possible, the District will also consider credit issues, market factors (e.g. bank qualification) and tax law when sizing the District's bond issuance.

ii. Refunding Bond Issuances: The sizing of refunding bonds will be determined by the amount of money that will be required to cover the principal of, accrued interest (if any) on, and redemption premium for the bonds to be defeased on the call date and to cover appropriate financing costs.

iii. Maximum Maturity: All bonds issued by the District shall mature within the limits set forth in applicable provisions of the Education Code or the Government Code. The final maturity of tax-exempt bonds will also be limited to the average useful life of the assets financed or as otherwise required by tax law.

iv. Taxable Bonds: Taxable bonds shall be considered for funding projects which do not satisfy the "spend-down" requirements of the Internal Revenue Code, for refunding GO Bonds when the issuance of tax-exempt refunding GO Bonds is not a viable option in the near term, and for other purposes when the requirements for tax-exemption cannot be met, including when a taxable financing alternative is enacted pursuant to federal law.

B. Lease-Purchase Obligations:

The final maturity of equipment or real property lease obligations will be limited to the useful life of the assets to be financed. Unless required for structuring or other purposes, the District will avoid the use of capitalized interest on new money lease financings to avoid increasing the principal amount of the debt and the related interest expense. New money lease financings in which the project financed serves as the leased asset may require capitalized interest until the District has use and possession of the leased asset. However, when feasible the District may undertake an asset transfer financing in which the leased property is other than the facility under construction in an effort to reduce or eliminate the need for capitalized interest.

3. Debt Service Structure: The District shall design the financing schedule and repayment of debt so as to take best advantage of market conditions, provide flexibility, and, as practical, to recapture or maximize its debt capacity for future use.

[E] 4. Selection of Method of Sale: There are three primary methods of sale: negotiated, competitive, and private placement. All three methods of sale should be evaluated by the Assistant Superintendent of Business & Fiscal Services or other appropriate District official for all debt issuances, with the recommended and selected method of sale presented to the Board in the authorizing resolution. In selecting a method of sale to present to the District Board, the primary factor to be considered is the sale method most likely to achieve the lowest financing cost to the District. Other secondary considerations will include current volatility in bond markets, the complexity of the financing structure, financing timeline considerations, and the goals to be achieved by the financing. ~~In selecting a method of sale to present to the District Board, factors to be considered among others include the method likely to achieve the lowest financing cost to the District, conditions in the financial markets, the complexity of the financing structure, the ability to modify the structure at pricing, the ability to educate potential investors about the District, the debt offering and security, financing timeline considerations, and the goals to be achieved by the financing, shall be evaluated.~~ When a negotiated sale is authorized, the final pricing proposal shall be examined with the assistance of the District's municipal advisor to ensure that interest costs are in accordance with comparable market interest rates and that all parameters identified in the Board resolution have been achieved. When a competitive bidding process is undertaken, submitted bids shall be examined with the assistance of the District's municipal advisor and award shall be based on the best conforming that complies with the terms of the official notice of sale governing the bidding process, which typically provides award shall be made based on the lowest offered True Interest Cost ("TIC"). A private placement sale is appropriate when the financing can or must be structured for a single or limited number of purchasers or where the terms of the private placement are expected to be more beneficial to the District than either a negotiated or competitive sale.

[F] 5. Engagement of Financing Team Members: The District requires assistance in its debt undertakings and with respect to certain financial matters by a financing team composed of firms with specialized expertise in the issuance of debt and debt undertakings. The District Board shall confirm the firms which shall serve as municipal advisor, bond and disclosure counsel, and underwriter and approve related contracts or engagement letters relating thereto. The recommendation for the engagement of such firms shall be made by District staff either following a Request for Proposals (RFP) or Request for Qualifications (RFQ) process, or on a sole source basis if an RFP or RFQ process would not be in the District's interests ~~or based on other factors and considerations~~. The term of the contracts for financing team members will be for an initial term of up to five years, which term may be extended or renewed for additional terms by the District Board with approval of a renewal contract, amendment or extension.

All financing team members will be required to provide full and complete disclosure, under penalty of perjury, relative to any and all agreements with other financing team members and outside parties (if any). The extent of the disclosure may vary depending on the nature of the transaction. Any financing team

members involved in preparing proposed District debt issuances or who have outside agreements with members so involved may not provide independent analyses of said debt issuances. All financing team members shall abide by the Board's code of ethics, which shall be provided by the District to each of said professionals prior to engagement.

6. Disclosure Requirements: The District shall prepare or cause to be prepared appropriate disclosures as required by Securities and Exchange Commission Rule 15c2-12 and to ensure compliance with applicable laws, regulations and agreements. The Assistant Superintendent of Business & Fiscal Services shall be responsible for the District's disclosure compliance functions, in conjunction with the third party dissemination agent engaged by the District to assist in the complete and timely filings, and in consultation with the District's disclosure counsel, as needed.

7. IRS Compliance: The Assistant Superintendent of Business & Fiscal Services will establish and maintain a system of record keeping and reporting to meet the arbitrage rebate compliance requirements as required by federal tax regulations. This effort shall include tracking investment earnings on bond proceeds, calculating rebate payments in compliance with tax law, and remitting any rebate earnings to the federal government in a timely manner in order to preserve the tax-exempt status of the District's outstanding tax-exempt obligations. The Assistant Superintendent of Business & Fiscal Services may retain a firm to prepare arbitrage rebate calculations and communicate with the IRS.

8. Rating Agency Relations: The District shall maintain effective relations with the rating agencies. The Assistant Superintendent of Business & Fiscal Services shall meet with, make presentations to, or otherwise communicate with the rating agencies on a consistent and as appropriate basis to keep the agencies informed about the District's capital plans, debt issuance program, and other appropriate financial information.

Use of Proceeds

The District shall be vigilant in using bond proceeds in accordance with the stated purposes at the time such debt was incurred. In furtherance of the policy, and in connection with the issuance of all GO Bonds:

1. As required by Government Code Section 53410, the District shall only use GO Bond proceeds for the purposes approved by the District's voters; and
2. District staff shall have the responsibility, no less often than annually, to provide to the District's Board of Education a written report which shall contain at least the following information:
 - (i) The amount of the debt proceeds received and expended during the applicable reporting period; and
 - (ii) The status of the acquisition, construction or financing of the school facility projects, as identified in any applicable bond measure, with the proceeds of the debt.
 - (iii) These reports may be combined with other periodic reports which include the same information, including but not limited to, periodic reports made to the California Debt and Investment Advisory Commission, or continuing disclosure reports or other reports made in connection with the debt. These requirements shall apply only until the earliest of the following: (i) all the debt is redeemed or defeased, but if the debt is refunded, such provisions shall apply until all such refunding bonds are redeemed or defeased, or (ii) all proceeds of the debt, or any investment earnings thereon, are fully expended.

3. The District shall post on the District website the Annual Report of the District's Independent Bond Oversight Committee which has been given the responsibility to review the expenditure of GO Bond proceeds to assure the community that all GO Bond funds have been used for the construction, renovation, repair, furnishing and equipping of school facilities, and not used for teacher or administrator salaries or other operating expenses.

4. The District shall hire an independent auditor to perform an annual independent financial and performance audit of the expenditure of GO Bond proceeds, and to post such audits on the District website.

Legal Reference:

EDUCATION CODE

5300-5441 Conduct of elections

15100-15262 Bonds for school districts and community college districts

15264-15276 Strict accountability in local school construction bonds

15278-15288 Citizen's oversight committees

15300-15425 School Facilities Improvement Districts

17150 Public disclosure of non-voter-approved debt

17400-17429 Leasing of district property

17450-17453.1 Leasing of equipment

17456 Sale or lease of district property

17596 Duration of contracts

42130-42134 Financial reports and certifications

ELECTIONS CODE

1000 Established election dates

GOVERNMENT CODE

8855 California Debt and Investment Advisory Commission

53311-53368.3 Mello-Roos Community Facilities Act

53410-53411 Bond reporting

53506-53509.5 General obligation bonds

53550-53569 Refunding bonds of local agencies

53580-53595.55 Bonds

53850-53858 Tax and revenue anticipation notes

53859-53859.08 Grant anticipation notes

CALIFORNIA CONSTITUTION

Article 13A, Section 1 Tax limitation

Article 16, Section 18 Debt limit

UNITED STATES CODE, TITLE 15

78o-4 Registration of municipal securities dealers

UNITED STATES CODE, TITLE 26

54E Qualified Zone Academy Bonds

CODE OF FEDERAL REGULATIONS, TITLE 17

240.10b-5 Prohibition against fraud or deceit

240.15c2-12 Municipal securities disclosure

CODE OF FEDERAL REGULATIONS, TITLE 26

1.6001-1 Records

Management Resources:

CALIFORNIA DEBT AND INVESTMENT ADVISORY COMMISSION PUBLICATIONS

California Debt Issuance Primer

GOVERNMENT FINANCE OFFICERS ASSOCIATION PUBLICATIONS

An Elected Official's Guide to Debt Issuance, 2nd Ed., 2016

Understanding Your Continuing Disclosure Responsibilities, Best Practice, September 2015

Investment of Bond Proceeds, Best Practice, September 2014

Selecting and Managing Municipal Advisors, Best Practice, February 2014

Debt Management Policy, Best Practice, October 2012

Analyzing and Issuing Refunding Bonds, Best Practice, February 2011

INTERNAL REVENUE SERVICE PUBLICATIONS

Tax Exempt Bond FAQs Regarding Record Retention Requirements

Tax-Exempt Governmental Bonds, Publication 4079, rev. 2016

U.S. GOVERNMENT ACCOUNTABILITY OFFICE PUBLICATIONS

Internal Control System Checklist

WEB SITES

California Debt and Investment Advisory Commission: <http://www.treasurer.ca.gov/cdiac>

Government Finance Officers Association: <http://www.gfoa.org>

Internal Revenue Service: <http://www.irs.gov>

Municipal Security Rulemaking Board, Electronic Municipal Market Access (EMMA): <http://www.emma.msrb.org>

U.S. Government Accountability Office: <http://www.gao.gov>

U.S. Securities and Exchange Commission: <http://www.sec.gov>

Policy SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

adopted: May 4, 2017 Santa Monica, California

To: SMMUSD Board of Education
From: Payal S. Maniar, Chair, Financial Oversight Committee
Subject: FOC Mid-Year Progress Report
Date: February 24, 2022

The SMMUSD Financial Oversight Committee (FOC) was established as an independent oversight committee to review matters potentially having a significant impact on District finances. The FOC also serves as the Measure R Independent Citizens Oversight Committee, provides monitoring and review of the District budget process, the City of Santa Monica Joint Use Agreement, the City of Malibu Joint Use Agreement, the District Audit, enrollment projections, revenue and expenditure forecasts, the capital program and public education regarding district finances.

For the fiscal year 2021-2022 FOC formed six ad-hoc committees (subcommittees) to work on the charges as approved by the School Board.

2021-22 FOC subcommittee members:

- Budget Recommendations: Mr. Jacobson, Mr. Covington, Mr. Beekman, Mr. Rotgin, Mr. Chin¹
- Tax Revenue and Assessed Valuation: Mr. Farivar, Mr. Kremer, Mr. Crawford, Mr. Beekman
- Bond Oversight: Mr. Kremer, Mr. Crawford, Ms. Mevasse, Mr. Rotgin
- Measure R Reporting and Process Review: Mr. Crawford, Mr. Landres, Ms. Maniar, Mr. Chin¹
- Financial Communication and Reporting: Mr. Landres, Ms. Maniar, Ms. Mevasse, Mr. Jacobson
- Nominations: Mr. Covington, Mr. Kremer, Ms. Maniar, Mr. Farivar

The following is a mid-year progress update on the Financial Oversight Committee's work as expressed in the updates from our various ad-hoc committees.

Budget Recommendations: The Budget subcommittee's charge includes reviewing the SMMUSD annual budget and providing additional oversight, evaluation and recommendations related to specific elements of the budgeting process. The Budget Subcommittee has worked with staff to plan out a calendar of subcommittee reviews that occur prior to budget updates being submitted to the School Board. This enables the subcommittee to provide insights or recommendations for areas requiring further clarification or analysis prior to review by the School Board and the full Financial Oversight Committee (whenever possible).

This past year, the Budget Subcommittee also reviewed and provided recommendations on how staff can outline and provide more clarity on COVID-19 related relief funding and expenses for student safety. The subcommittee also hopes to collaborate with staff on the efforts related to budget stabilization to address deficits as costs continue to rise with inflation, and enrollment rates continue to decline. Staff also informed the Budget Subcommittee that they are reviewing the district's use of CalPERS as its administrator for health and welfare benefits for active and retired employees. The Budget subcommittee may assist staff with research and review as staff begins to review options.

Tax Revenue and Assessed Valuation: The Tax Revenue & Assessed Valuation Subcommittee met with the Assistant Superintendent Melody Canady and Director of Fiscal Services Gerardo Cruz to discuss how the subcommittee can help continue to improve budget projections / process. The subcommittee is taking three primary actions:

¹ Joined ad-hoc committee on February 24, 2022

- To continue to liaise with the City of Santa Monica to provide the fastest possible updates to Measure GSH / YY revenue updates (including an update in February 2022)
- To assist with the search and review of redevelopment consultant services to help prepare RPTTF financial projections through FY 2041-42 for use in the District's multi-year budget planning
- To assist staff with possible refinancing of enforceable obligations of the RPTTF

Bond Oversight: At the Joint Board/FOC meeting in July 2021, the Financial Oversight Committee provided suggested changes to the District's Debt Issuance and Management Policy. Through the Fall and into early 2022, the FOC Bond Oversight Subcommittee participated on calls with the Board liaisons and staff to discuss these changes. Staff directed the District's Bond Counsel firm, Jones Hall, to prepare an updated draft of the Debt Policy based on the FOC's suggestions and subsequent discussions. The FOC Bond Oversight Subcommittee reviewed this draft and provided a memo to Staff enumerating areas of concern with additional changes noted. Staff responded that these additional changes will be accepted and incorporated into a revised draft of the Debt Policy for final FOC review in February and in advance of Board action on the Debt Policy, possibly during March 2022.

Measure R Reporting and Process Review: In late November, this subcommittee met with Dr. Mora to learn about the Measure R budgeting process, how they make decisions, and how those decisions progress to the public reports. After that discussion the subcommittee discussed next steps and how to provide meaningful input into the Measure R presentation in time to influence the 2022-23 Measure R budget. At this point we are working with staff to get the data needed to provide substantive recommendations, and will work closely with staff between now and the March FOC meeting when the budget proposal will be presented to the FOC.

Financial Communication and Reporting: This ad-hoc subcommittee is working collaboratively with Community & Public Relations Officer, Gail Pinsker, to identify specific ways that the District can both clarify its financial communications to the public and incorporate fiscal stewardship-related principles into the District's broader communication strategy. The subcommittee expects to be able to present findings and recommendations by May.

Nominations: The nominations ad-hoc committee has commenced the process to solicit FOC candidates for three-year term commencing with the 2022-2023 school year. There are 3 FOC members with terms expiring at the end of the 2021-2022 school year. Announcements of the openings to the general public will be going out this month; current FOC members who wish to stand for another term may reapply. The application period will be open until April 22. The ad-hoc committee will review all written applications and conduct interviews of appropriate candidates. It will make its recommendation for the candidates to fill the open positions to the full FOC at the May meeting.

Respectfully submitted,
Payal S Maniar
Chair, Financial Oversight Committee

CERBT Account Update Summary

Santa Monica-Malibu Unified School District

as of December 31, 2021

OPEB Valuation Report Summary

OPEB Actuarial Valuation Report by Demsey, Filliger, and Associates	
Valuation Date	7/1/2019
Measurement Date	-
Total OPEB Liability (TOL)	\$48,696,722
Valuation Assets	\$5,864,788
Net OPEB Liability (NOL)	\$42,831,934
Funded Status	12%
Actuarially Determined Contribution (ADC)	\$0
CERBT Asset Allocation Strategy	Strategy 1
Discount Rate	4.09%

CERBT Account Summary

As of December 31, 2021	Strategy 1
Initial contribution (06/23/2016)	\$1,500,000
Additional contributions	\$3,500,000
Disbursements	\$0
CERBT expenses	(\$25,072)
Investment earnings	\$3,105,356
Total assets	\$8,080,284
Annualized net rate of return (06/23/2016-12/31/2021 = 5.52 years)	10.54%

Cash Flow Summary by Fiscal Year

Fiscal Year	Contributions	Disbursements	Cumulative Investment Gains (Losses)	Cumulative Fees	Cumulative Ending Assets
2006-07	\$0	\$0	\$0	\$0	\$0
2007-08	\$0	\$0	\$0	\$0	\$0
2008-09	\$0	\$0	\$0	\$0	\$0
2009-10	\$0	\$0	\$0	\$0	\$0
2010-11	\$0	\$0	\$0	\$0	\$0
2011-12	\$0	\$0	\$0	\$0	\$0
2012-13	\$0	\$0	\$0	\$0	\$0
2013-14	\$0	\$0	\$0	\$0	\$0
2014-15	\$0	\$0	\$0	\$0	\$0
2015-16	\$1,500,000	\$0	(\$8,990)	(\$24)	\$1,490,986
2016-17	\$2,500,000	\$0	\$224,277	(\$1,830)	\$4,222,447
2017-18	\$1,000,000	\$0	\$536,176	(\$6,006)	\$5,530,170
2018-19	\$0	\$0	\$879,948	(\$10,719)	\$5,869,229
2019-20	\$0	\$0	\$1,089,729	(\$15,770)	\$6,073,959
2020-21	\$0	\$0	\$2,761,612	(\$21,688)	\$7,739,924
as of 12/31/2021	\$5,000,000	\$0	\$3,105,356	(\$25,072)	\$8,080,284

CERBT/CEPPT Investment Returns Outperform Benchmarks

Periods ended November 30, 2021

Fund	Assets	1 Month	3 Months	FYTD	1 Year	3 Years	5 Years	10 Years	ITD
CERBT Strategy 1 (Inception June 1, 2007)	\$14,257,799,070	-1.84%	-1.29%	1.42%	14.35%	13.45%	10.99%	9.26%	6.20%
Benchmark		-1.87%	-1.34%	1.34%	14.14%	13.17%	10.65%	8.92%	5.79%
CERBT Strategy 2 (Inception October 1, 2011)	\$1,934,821,232	-1.30%	-0.94%	1.52%	10.63%	12.03%	9.46%	7.90%	8.24%
Benchmark		-1.32%	-0.97%	1.46%	10.45%	11.82%	9.14%	7.57%	7.95%
CERBT Strategy 3 (Inception January 1, 2012)	\$851,347,899	-0.79%	-0.45%	1.84%	8.10%	10.54%	7.86%	-	6.51%
Benchmark		-0.80%	-0.47%	1.81%	7.98%	10.37%	7.61%	-	6.21%
CERBT Total	\$17,043,968,201								
CEPPT Strategy 1 (Inception October 1, 2019)	\$43,108,251	-1.07%	-1.16%	0.98%	9.28%	-	-	-	10.17%
Benchmark		-1.10%	-1.22%	0.93%	9.16%	-	-	-	10.15%
CEPPT Strategy 2 (Inception January 1, 2020)	\$21,181,911	-0.31%	-0.83%	0.79%	4.02%	-	-	-	6.01%
Benchmark		-0.32%	-0.85%	0.77%	3.86%	-	-	-	5.86%
CEPPT Total	\$64,290,162								

CERBT Expected Rates of Return & Risk

Portfolios	CERBT Strategy 1	CERBT Strategy 2	CERBT Strategy 3
Expected Return	7.59%	7.01%	6.22%
Risk	11.83%	9.24%	7.28%

CERBT Portfolio Details

Asset Classification	Benchmark	CERBT Strategy 1	CERBT Strategy 2	CERBT Strategy 3
Global Equity	MSCI All Country World Index	59% ±5%	40% ±5%	22% ±5%
Fixed Income	Barclays Capital Long Liability Index (CERBT)	25% ±5%	43% ±5%	49% ±5%
Global Real Estate (REITs)	FTSE EPRA/NAREIT Developed Liquid Index	8% ±5%	8% ±5%	8% ±5%
Treasury Inflation Protected Securities (TIPS)	Barclays Capital Global Real: US TIPS Index	5% ±3%	5% ±3%	16% ±3%
Commodities	S&P GSCI Total Return Index	3% ±3%	4% ±3%	5% ±3%
Cash	3-Month Treasury Bill	0% +2%	0% +2%	0% +2%

Total Participation Cost Fee Rate

- Total all-inclusive cost of participation
 - Combines administrative, custodial, and investment fees
 - Separate trust funds
 - Self-funded, fee rate may change in the future
 - Fee is applied daily to assets under management
 - 10 basis points - CERBT
 - 25 basis points - CEPPT

CEPPT/CERBT Consistently Low Fee Rate History

Fiscal Year	CERBT	CEPPT
2007-2008	2.00 basis points	-
2008-2009	6.00 basis points	-
2009-2010	9.00 basis points	-
2010-2011	12.00 basis points	-
2011-2012	12.00 basis points	-
2012-2013	15.00 basis points	-
2013-2014	14.00 basis points	-
2014-2015	10.00 basis points	-
2015-2016	10.00 basis points	-
2016-2017	10.00 basis points	-
2017-2018	10.00 basis points	-
2018-2019	10.00 basis points	-
2019-2020	10.00 basis points	25.00 basis points
2020-2021	10.00 basis points	25.00 basis points
2021-2022	10.00 basis points	25.00 basis points

606 Prefunding Program Employers

591 CERBT and 58 CEPPT

- State of California
- 154 Cities or Towns
- 10 Counties
- 79 School Employers
- 31 Courts
- 331 Special Districts and other Public Agencies
 - (100 Water, 36 Sanitation, 33 Fire, 25 Transportation)

Financial Reporting

- CERBT is the Plan
 - Provides audited and compliant GASB 74 report in a Schedule of Changes in Fiduciary Net Position (FNP)
 - Published in February each year

FNP Fiscal Year	Availability
2015-16	Available at https://www.calpers.ca.gov/cerbt
2016-17	
2017-18	
2018-19	
2019-20	
2020-21	January 2022

Questions? Where to Get Trust Fund Information?

Name	Title	E-mail	Desk	Mobile
Matt Goss	Outreach & Support Program Manager	Matthew.Goss@calpers.ca.gov	(916) 795-9071	(916) 382-6487
Karen Lookingbill	Outreach & Support Manager	Karen.Lookingbill@calpers.ca.gov	(916) 795-1387	(916) 501-2219
Vic Anderson	Outreach & Support Manager	Victor.Anderson@calpers.ca.gov	(916) 795-3739	(916) 281-8214
Jasper Jacobs	Outreach & Support Analyst	Jasper.Jacobs@calpers.ca.gov	(916) 795-0432	(916) 717-3886
Colleen Cain-Herrback	Administration & Reporting Program Manager	Colleen.Cain-Herrback@calpers.ca.gov	(916) 795-2474	(916) 505-2506
Robert Sharp	Assistant Division Chief	Robert.Sharp@calpers.ca.gov	(916) 795-3878	(916) 397-0756

Program E-mail Addresses	Prefunding Programs Webpages
CERBT4U@calpers.ca.gov – Questions & Document Submittal	www.calpers.ca.gov/CERBT
CEPPT4U@calpers.ca.gov – Questions & Document Submittal	www.calpers.ca.gov/CEPPT
CERBTACCOUNT@calpers.ca.gov – Online Record Keeping System	

Santa Monica-Malibu Unified School District

CERBT Strategy 1

Entity #: SKB0-1188894074-001

Quarter Ended December 31, 2021



Market Value Summary:

	QTD Current Period	Fiscal Year to Date
Beginning Balance	\$7,706,666.41	\$7,739,924.41
Contribution	0.00	0.00
Disbursement	0.00	0.00
Transfer In	0.00	0.00
Transfer Out	0.00	0.00
Investment Earnings	375,319.41	343,744.03
Administrative Expenses	(983.00)	(1,954.95)
Investment Expense	(718.78)	(1,429.45)
Other	0.00	0.00
Ending Balance	\$8,080,284.04	\$8,080,284.04
FY End Contrib per GASB 74 Para 22	0.00	0.00
FY End Disbursement Accrual	0.00	0.00
Grand Total	\$8,080,284.04	\$8,080,284.04

Unit Value Summary:

	QTD Current Period	Fiscal Year to Date
Beginning Units	348,363.826	348,363.826
Unit Purchases from Contributions	0.000	0.000
Unit Sales for Withdrawals	0.000	0.000
Unit Transfer In	0.000	0.000
Unit Transfer Out	0.000	0.000
Ending Units	348,363.826	348,363.826
Period Beginning Unit Value	22.122464	22.217933
Period Ending Unit Value	23.194957	23.194957

Please note the Grand Total is your actual fund account balance at the end of the period, including all contributions per GASB 74 paragraph 22 and accrued disbursements. Please review your statement promptly. All information contained in your statement will be considered true and accurate unless you contact us within 30 days of receipt of this statement. If you have questions about the validity of this information, please contact CERBT4U@calpers.ca.gov.

Statement of Transaction Detail for the Quarter Ending 12/31/2021

Santa Monica-Malibu Unified School District

Entity #: SKB0-1188894074-001



Date	Description	Amount	Unit Value	Units	Check/Wire	Notes
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Client Contact:
CERBT4U@CalPERS.ca.gov

Investment Objective

The Strategy seeks an investment return that approximates as closely as practicable, before expenses, the performance of its benchmark index (the "Index") over the long term.

Benchmark

Bloomberg Barclays Long Liability Index

Investment Strategy

The Strategy is managed using an "indexing" investment approach, by which SSGA attempts to approximate, before expenses, the performance of the Index over the long term. The Strategy will not necessarily own all of the securities included in the Index.

The Strategy may attempt to invest in the securities comprising the Index, in the same proportions as they are represented in the Index, in limited cases where we believe it is practical to do so. However, due to the diverse composition of securities in the Index and the fact that many of the securities comprising the Index may be unavailable for purchase, it may not be possible for the Strategy to purchase some of the securities comprising the Index. In such a case, SSGA will select securities for the Portfolio that SSGA expects will provide a return comparable to that of the Index.

SSGA expects that it will typically seek to replicate Index returns for the Portfolio through investments in the "cash" markets - actual holdings of debt securities and other instruments - rather than through "notional" or "synthetic" positions achieved through the use of derivatives, such as futures contracts or swap transactions (except in the unusual case where SSGA believes that use of derivatives is necessary to achieve an exposure that is not readily available through the cash markets). The Strategy's return may not match the return of the Index.

Additional permitted investments are cash and cash equivalents, including shares of registered money market funds for which an affiliate or non-affiliate of SSGA acts as the investment adviser (the "Money Market Funds"). Commercial Paper, if held directly by the Strategy, will have a minimum credit rating of A1 or P1. U.S. Government Note and Bond futures contracts shall be limited to exchange-traded futures contracts solely for hedging purposes to reduce strategy risk relative to the Index. Non-exchange traded derivatives shall not be utilized as an investment in the Strategy.

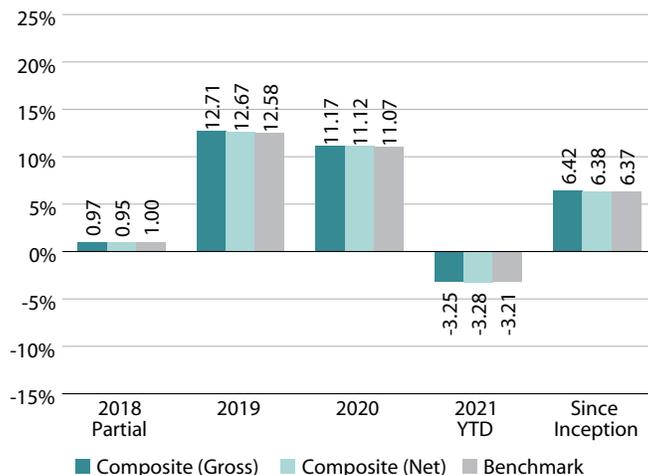
Key Facts

- Managed using an indexing strategy
- Does not normally use futures or other derivatives to create "notional" or "synthetic" index exposures
- Only designated 'Securities Lending' Portfolios may lend and enter repurchase agreements (See applicable governing documents for a Portfolio's authority to lend. Participation in a securities lending program may adversely affect the investment returns and risk profile of the Portfolio. See "Securities Lending Risk; Risks of Investment of Cash Collateral" in the Strategy Disclosure Document.)
- May invest in other investment pools, including those managed by SSGA and its affiliates
- Is not a leveraged strategy
- Will not sell securities short

Performance

Total Returns	Composite (Gross) ^{1,2}	Composite (Net) ^{1,3}	Benchmark ⁴
Q3 2021	0.11%	0.10%	0.13%
YTD	-3.25%	-3.28%	-3.21%
1 Year	-2.77%	-2.81%	-2.77%
3 Year	7.12%	7.08%	7.07%
5 Year	N/A	N/A	N/A
Inception to Date (Jul 2018)	6.42%	6.38%	6.37%

Calendar Year Returns^{1,2,3,4}



1 Returns greater than one year are annualized. Returns represent past performance and are not a guarantee of future results. Current performance may differ from the performance shown. Returns shown are asset-weighted using Composite (as defined below) member market values, where the Composite member's return calculations are time-weighted and reflect the reinvestment of dividends and other income.

2 These performance figures are provided gross of fees and expenses other than actual trading fees and expenses, and reflect all items of income, gain, and loss (other than unrealized gain or loss on units of the securities lending pools held by any portfolio in the Composite). The performance figures do not take account of the mark to market value of the units of the securities lending cash collateral pools held by any of the portfolios in the Composite. If they had, the performance shown would have been lower.

3 These performance figures (i) are provided net of actual trading, audit, custody, administrative and legal fees and expenses; (ii) beginning on 9/30/2014, adjusted quarterly to reflect the highest investment management fee on the actual fee schedule, inclusive of incentive fee, if any, of any account within the Composite ("Management Fee") at the relevant time; prior to 9/30/2014, adjusted for an assumed investment management fee, which is equal to or higher than the Management Fee (except in each case certain small accounts-subject to a minimum investment management fee-may have incurred an actual investment management fee higher than that fee assumed in calculating the performance shown above); and (iii) reflect all items of income, gain and loss (other than unrealized gain or loss on units of the securities lending pools held by any portfolio in the Composite).

4 Index returns are unmanaged and do not reflect the deduction of any fees or expenses. Index returns reflect all items of income, gain and loss and the reinvestment of dividends (net of any applicable withholding tax rates) and other income and are calculated in U.S. dollars. It is not possible to invest directly in an index.

Performance returns are calculated in U.S. dollars.

For the purpose of complying with the Global Investment Performance Standards (GIPS), the firm ("SSGA-Global") is defined as all portfolios managed across the global offices of State Street Global Advisors (SSGA) and SSGA Funds Management, Inc., with the exception of Charitable Asset Management which is held out to the marketplace as a distinct business entity. Prior to January 2011, SSGA-Global excluded its wrap fee business and assets accounted for on a book value basis (global cash and stable value assets). Prior to July 2017, SSGA-Global excluded Fiduciary Advisory Solutions. In January 2011, SSGA acquired the Bank of Ireland Asset Management Limited (now known as SSGA Ireland Limited), a GIPS Compliant firm. On January 01, 2012 SSGA Ireland Limited assets were merged into SSGA-Global. In July 2016, SSGA acquired the asset management and advisory services business conducted by GE Asset Management ("GEAM"), a GIPS Compliant firm. On July 01, 2017 GEAM assets were merged into SSGA-Global.

The Bloomberg Barclays Long Liability Index Composite (the "Composite"), inception date 7/1/2018, seeks to achieve the Investment Objective described above using the Investment Strategy described above, and includes portfolios managed across the global offices of SSGA-Global. To receive a complete list and description of SSGA-Global's composites and/or a GIPS* compliant presentation, please contact your SSGA Representative.

An investment in the Strategy is not FDIC insured, nor is it an obligation or deposit of, or guaranteed by State Street Corporation, SSGA or their affiliates.

Source: Bloomberg Barclays Indices. ©2021 Bloomberg Finance L.P. and its affiliates. Used with permission.

This document provides summary information regarding the Strategy. It should be read in conjunction with the Strategy's Disclosure Document, which is available from SSGA. The Strategy Disclosure Document contains important information about the Strategy, including a description of a number of risks.

Supplemental Information

Characteristics

Average Credit Quality	AA3
Average Effective Convexity	1.46
Average Effective Maturity	14.56
Average Yield to Worst	2.14%
Composite Assets Under Management (M)	US\$8,536.46
Effective Duration	11.21
Total Number of Holdings	4,613

Credit Quality Breakdown

Aaa	70.28%
Aa	2.28
A	9.94
Baa	15.02
Below BAA	2.46
Not Rated	0.03

Top Issuers

US/T	39.82%
FNMA	14.21
FHLMC	6.27
GNMA	4.68
G2SF	1.31
FNCL	1.07
FHMS	0.74
MEX	0.57
VZ	0.39
BAC	0.34

Sector Allocation

Treasury	39.82%
Mortgage Backed Securities	27.54
CORPORATE - INDUSTRIAL	18.57
Corporate - Finance	5.66
Non Corporates	3.01
Corporate - Utility	2.85
CMBS	2.08
Asset Backed Securities	0.26
Cash	0.21

Investment Manager

The Strategy is managed by State Street Global Advisors Trust Company, a wholly owned subsidiary of State Street Bank and Trust Company, and a global leader in providing investment management solutions to clients worldwide. To learn more about SSGA, visit our web site at www.ssga.com.

The Supplemental Information above (except for the Beta and Standard Deviation, if shown) is that of a single representative account within the Composite, which is subject to change. The representative account was chosen because it has no material restrictions and fairly represents the investment style of the Strategy. The Supplemental Information should not be deemed to be reflective of (and could differ from) the overall Composite or any other single account within the Composite. Certain Supplemental Information may be rounded to the nearest hundredth decimal and may result in the total not adding up to 100.

The Top Holdings reflect certain securities that the representative account has bought and may not be representative of the Strategy's current or future investments. In the case of fixed income and cash funds the securities are aggregated and shown at the issuer level. The Top Holdings do not include other assets or instruments that may be held by the representative account including, for example and not by way of limitation, cash or cash equivalents and derivatives such as futures, options and swaps. The figures presented are as of the date shown above, do not include the representative account's entire investment portfolio, and may change at any time. This information should not be considered a recommendation to invest in a particular sector or to buy or sell any security. It is not known whether an investment in any sectors or securities will be profitable in the future.

Characteristics are calculated using the month-end market value of holdings of the representative account, and where averages are shown these reflect the market weights of the securities in the representative account. For beta and standard deviation, if shown, these reflect Composite month-end returns. Characteristics are as of the date indicated, are subject to change, and should not be relied upon as current thereafter.

Market data, prices, and estimates for characteristics calculations provided by Bloomberg Portfolio Risk and Analytics Schedule of Services (PORT+). Average Credit Quality reflects market value weight of all the rated securities held by the portfolio (excludes unrated securities) using the middle rating provided by either S&P, Moody's and Fitch or lower if only two agency ratings are available. All other portfolio data provided by SSGA. Characteristics are as of the date indicated, are subject to change, and should not be relied upon as current thereafter. Fixed income asset class and country reporting based on Bloomberg Barclays indices which are trademarks of Bloomberg Barclays Inc. and have been licensed for use by State Street. Bloomberg Barclays or its affiliates ("Bloomberg Barclays") shall not be liable for any inaccuracies or errors with respect to any data or Index referenced herein, nor does Bloomberg Barclays sponsor, endorse or promote the Strategy.

SSGA generally delegates commodities management for separately managed accounts to SSGA FM, a wholly owned subsidiary of State Street and an affiliate of SSGA. SSGA FM is registered as a commodity trading advisor ("CTA") with the Commodity Futures Trading Commission and National Futures Association.

State Street regards the Fact Sheets in their distributed form to be complete documents that include material information regarding the Strategy for investment consideration. The whole or any part of this work may not be reproduced, copied or transmitted or any of its contents disclosed to third parties without SSGA's express written consent.

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Supplemental Information

Top Countries

United States	93.79%
Canada	0.89
Mexico	0.70
United Kingdom	0.64
Japan	0.48
Philippines	0.30
Colombia	0.30
China	0.26
Peru	0.25
Netherlands	0.25

Important Message About Risk

For institutional / professional investors use only.

Investing involves risk including the risk of loss of principal. Bonds generally present less short-term risk and volatility than stocks, but are subject to: interest rate risk (as interest rates raise, bond prices usually fall); issuer default risk; issuer credit risk; liquidity risk; and inflation risk. These effects are usually more pronounced for longer-term securities. Any fixed income security sold or redeemed prior to maturity may be subject to a substantial gain or loss. Investing in high yield fixed income securities, otherwise known as junk bonds, is considered speculative and involves greater risk of loss of principal and interest than investing in investment grade fixed income securities. These lower-quality debt securities involve greater risk of default and price changes due to potential changes in the credit quality of the issuer. In addition, the Strategy may use derivative instruments which may involve risks such as potential illiquidity of the markets and additional risk of loss of principal.

This document provides summary information regarding the Strategy. This document should be read in conjunction with the Strategy's Disclosure Document, which is available from SSGA. The Strategy Disclosure Document contains important information about the Strategy, including a description of a number of risks.

The information provided does not constitute investment advice and it should not be relied on as such. It should not be considered a solicitation to buy or an offer to sell a security. It does not take into account any investor's particular investment objectives, strategies, tax status or investment horizon. You should consult your tax and financial advisor.

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Securities Lending

The Strategy may participate in an agency securities lending program (the "Lending Program") sponsored by State Street Bank and Trust Company ("State Street") for the purpose of lending the Strategy's securities and investing the collateral in a collateral reinvestment fund (each a "Collateral Pool"). None of the Collateral Pools are FDIC-insured bank deposits or otherwise guaranteed by SSGA or State Street or any of their respective affiliates. Investors may lose money by participating in the Lending Program and through investments in a Collateral Pool. For more information, including the risks associated with participating in the Lending Program you should review the SSGA Securities Lending Program Disclosure and the disclosure document and fact sheet for the relevant Collateral Pool.

Investment Objective

The Portfolio seeks an investment return that approximates as closely as practicable, before expenses, the performance of its benchmark index (the "Index") over the long term.

Benchmark

FTSE® EPRA® NAREIT® Developed Index

Investment Strategy

The Strategy is managed using an "indexing" investment approach, by which SSGA attempts to approximate, before expenses, the performance of the Index over the long term. SSGA will typically attempt to invest in the equity securities comprising the Index, in approximately the same proportions as they are represented in the Index. Equity securities may include common stocks, preferred stocks, depository receipts, or other securities convertible into common stock. In some cases, it may not be possible or practicable to purchase all of the securities comprising the Index, or to hold them in the same weightings as they represent in the Index. In those circumstances, SSGA may employ a sampling or optimization technique to construct the portfolio in question.

From time to time securities are added to or removed from the Index. SSGA may sell securities that are represented in the Index, or purchase securities that are not yet represented in the Index, prior to or after their removal or addition to the Index. The Strategy's return may not match the return of the Index.

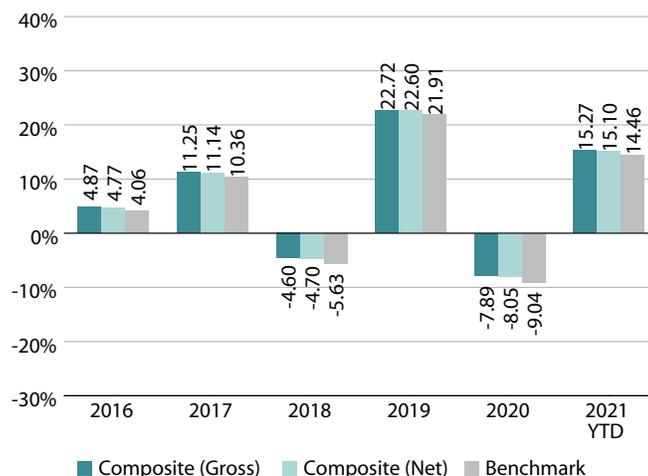
Key Facts

- Managed using an indexing strategy
- Only designated 'Securities Lending' Portfolios may lend and enter repurchase agreements (See applicable governing documents for a Portfolio's authority to lend. Participation in a securities lending program may adversely affect the investment returns and risk profile of the Portfolio. See "Securities Lending Risk; Risks of Investment of Cash Collateral" in the Strategy Disclosure Document.)
- May invest in other investment pools, including those managed by SSGA and its affiliates
- Is not a leveraged strategy
- Will not sell securities short

Performance

Total Returns	Composite (Gross) ^{1,2}	Composite (Net) ^{1,3}	Benchmark ⁴
Q3 2021	-0.68%	-0.73%	-0.90%
YTD	15.27%	15.10%	14.46%
1 Year	30.75%	30.48%	29.64%
3 Year	7.21%	7.05%	6.18%
5 Year	5.53%	5.39%	4.53%
10 Year	9.17%	9.04%	8.34%

Calendar Year Returns^{1,2,3,4}



1 Returns greater than one year are annualized. Returns represent past performance and are not a guarantee of future results. Current performance may differ from the performance shown. Returns shown are asset-weighted using Composite (as defined below) member market values, where the Composite member's return calculations are time-weighted and reflect the reinvestment of dividends and other income.

2 These performance figures are provided gross of fees and expenses other than actual trading fees and expenses, and reflect all items of income, gain, and loss (other than unrealized gain or loss on units of the securities lending pools held by any portfolio in the Composite). The performance figures do not take account of the mark to market value of the units of the securities lending cash collateral pools held by any of the portfolios in the Composite. If they had, the performance shown would have been lower.

3 These performance figures (i) are provided net of actual trading, audit, custody, administrative and legal fees and expenses; (ii) beginning on 9/30/2014, adjusted quarterly to reflect the highest investment management fee on the actual fee schedule, inclusive of incentive fee, if any, of any account within the Composite ("Management Fee") at the relevant time; prior to 9/30/2014, adjusted for an assumed investment management fee, which is equal to or higher than the Management Fee (except in each case certain small accounts-subject to a minimum investment management fee-may have incurred an actual investment management fee higher than that fee assumed in calculating the performance shown above); and (iii) reflect all items of income, gain and loss (other than unrealized gain or loss (other than unrealized gain or loss on units of the securities lending pools held by any portfolio in the Composite).

4 Index returns are unmanaged and do not reflect the deduction of any fees or expenses. Index returns reflect all items of income, gain and loss and the reinvestment of dividends (net of any applicable withholding tax rates) and other income and are calculated in U.S. dollars. It is not possible to invest directly in an index.

Performance returns are calculated in U.S. dollars.

For the purpose of complying with the Global Investment Performance Standards (GIPS), the firm ("SSGA-Global") is defined as all portfolios managed across the global offices of State Street Global Advisors (SSGA) and SSGA Funds Management, Inc., with the exception of Charitable Asset Management which is held out to the marketplace as a distinct business entity. Prior to January 2011, SSGA-Global excluded its wrap fee business and assets accounted for on a book value basis (global cash and stable value assets). Prior to July 2017, SSGA-Global excluded Fiduciary Advisory Solutions. In January 2011, SSGA acquired the Bank of Ireland Asset Management Limited (now known as SSGA Ireland Limited), a GIPS Compliant firm. On January 01, 2012 SSGA Ireland Limited assets were merged into SSGA-Global. In July 2016, SSGA acquired the asset management and advisory services business conducted by GE Asset Management ("GEAM"), a GIPS Compliant firm. On July 01, 2017 GEAM assets were merged into SSGA-Global.

An investment in the Strategy is not FDIC insured, nor is it an obligation or deposit of, or guaranteed by State Street Corporation, SSGA or their affiliates.

"FTSE" is a trademark of the London Stock Exchange Group companies, "Nareit" is a trademark of the National Association of Real Estate Investment Trusts ("Nareit") and "EPRA" is a trademark of the European Public Real Estate Association ("EPRA") and all are used by FTSE International Limited ("FTSE") under license.

The FTSE® EPRA® Nareit® Developed Index is calculated by FTSE. Neither FTSE, Euronext N.V., Nareit nor EPRA sponsor, endorse or promote SSGA's investment products and are not in any way connected to it and do not accept any liability.

All intellectual property rights within the index values and constituent list vest in FTSE, Euronext N.V., Nareit and EPRA. SSGA obtained full license from FTSE to use such intellectual property rights in the creation of this product.

This document provides summary information regarding the Strategy. It should be read in conjunction with the Strategy's Disclosure Document, which is available from SSGA. The Strategy Disclosure Document contains important information about the Strategy, including a description of a number of risks.

Supplemental Information

Characteristics

Annual Dividend Yield (Trailing 12 Months)	3.15%
Beta (Trailing 36 Months)	0.99
Composite Assets Under Management (M)	US\$3,429.63
Standard Deviation (Annualized 36 Months)	19.66%
Total Number of Holdings	380
Average Market Cap (M)	US\$20,786.41

Top Holdings

PROLOGIS INC	4.89%
EQUINIX INC	3.73
PUBLIC STORAGE	2.37
SIMON PROPERTY GROUP INC	2.24
DIGITAL REALTY TRUST INC	2.14
WELLTOWER INC	1.84
VONOVIA SE	1.84
AVALONBAY COMMUNITIES INC	1.64
EQUITY RESIDENTIAL	1.58
ALEXANDRIA REAL ESTATE EQUIT	1.56

Sector Allocation

Diversified	21.83%
Residential	17.82
Industrial	13.14
Retail	12.42
Office	10.54
Healthcare	7.22
Self Storage	5.24
Specialty	5.05
Lodging/Resorts	2.40
Data Centers	2.26
Industrial/Office	2.09

Top Countries

United States	58.34%
Japan	10.37
Hong Kong	4.70
United Kingdom	4.70
Germany	4.28
Australia	3.72
Singapore	3.16
Canada	2.98
Sweden	2.44
Belgium	1.15

Investment Manager

The Strategy is managed by State Street Global Advisors Trust Company, a wholly owned subsidiary of State Street Bank and Trust Company, and a global leader in providing investment management solutions to clients worldwide. To learn more about SSGA, visit our web site at www.ssga.com.

Important Message About Risk

For institutional / professional investors use only.

Investing involves risk including the risk of loss of principal. Generally, among asset classes, stocks are more volatile than bonds or short-term instruments. Stock values fluctuate in response to the activities of individual companies and general market and economic conditions and at times the risk level of the Strategy may be greater than that of the U.S. stock market in general. In addition, the Strategy may use derivative instruments which may involve risks such as potential illiquidity of the markets and additional risk of loss of principal.

This document provides summary information regarding the Strategy. This document should be read in conjunction with the Strategy's Disclosure Document, which is available from SSGA. The Strategy Disclosure Document contains important information about the Strategy, including a description of a number of risks.

The information provided does not constitute investment advice and it should not be relied on as such. It should not be considered a solicitation to buy or an offer to sell a security. It does not take into account any investor's particular investment objectives, strategies, tax status or investment horizon. You should consult your tax and financial advisor.

The trademarks and service marks referenced herein are the property of their respective owners. Third party data providers make no warranties or representations of any kind relating to the accuracy, completeness or timeliness of the data and have no liability for damages of any kind relating to the use of such data.

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Securities Lending

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The Supplemental Information above (except for the Beta and Standard Deviation, if shown) is that of a single representative account within the Composite, which is subject to change. The representative account was chosen because it has no material restrictions and fairly represents the investment style of the Strategy. The Supplemental Information should not be deemed to be reflective of (and could differ from) the overall Composite or any other single account within the Composite. Certain Supplemental Information may be rounded to the nearest hundredth decimal and may result in the total not adding up to 100.

The Top Holdings reflect certain securities that the representative account has bought and may not be representative of the Strategy's current or future investments. In the case of fixed income and cash funds the securities are aggregated and shown at the issuer level. The Top Holdings do not include other assets or instruments that may be held by the representative account including, for example and not by way of limitation, cash or cash equivalents and derivatives such as futures, options and swaps. The figures presented are as of the date shown above, do not include the representative account's entire investment portfolio, and may change at any time. This information should not be considered a recommendation to invest in a particular sector or to buy or sell any security. It is not known whether an investment in any sectors or securities will be profitable in the future.

Characteristics are calculated using the month-end market value of holdings of the representative account, and where averages are shown these reflect the market weights of the securities in the representative account. For beta and standard deviation, if shown, these reflect Composite month-end returns. Characteristics are as of the date indicated, are subject to change, and should not be relied upon as current thereafter.

Market data, prices, and dividend estimates for characteristics calculations provided by Factset Research Systems, Inc. All other portfolio data provided by SSGA.

SSGA generally delegates commodities management for separately managed accounts to SSGA FM, a wholly owned subsidiary of State Street and an affiliate of SSGA. SSGA FM is registered as a commodity trading advisor ("CTA") with the Commodity Futures Trading Commission and National Futures Association.

State Street regards the Fact Sheets in their distributed form to be complete documents that include material information regarding the Strategy for investment consideration. The whole or any part of this work may not be reproduced, copied or transmitted or any of its contents disclosed to third parties without SSGA's express written consent.

Investment Objective

The Strategy seeks an investment return that approximates as closely as practicable, before expenses, the performance of its benchmark index (the "Index") over the long term.

Benchmark

The MSCI ACWI IMI Index is a free float-adjusted market capitalization weighted index that is designed to measure the equity market performance of developed and emerging markets.

Investment Strategy

The Strategy is managed using an "indexing" investment approach, by which SSGA attempts to approximate, before expenses, the performance of the Index over the long term. SSGA will typically attempt to invest in the equity securities comprising the Index, in approximately the same proportions as they are represented in the Index. Equity securities may include common stocks, preferred stocks, depository receipts, or other securities convertible into common stock. Equity securities held by the Strategy may be denominated in foreign currencies and may be held outside the United States. In some cases, it may not be possible or practicable to purchase all of the securities comprising the Index, or to hold them in the same weightings as they represent in the Index. In those circumstances, SSGA may employ a sampling or optimization technique to construct the portfolio in question. A Portfolio may also invest in the securities of Chinese companies, normally restricted to residents of the People's Republic of China (commonly known as "A Shares" or "China A Shares"), through the Stock Connect program or other channels.

From time to time securities are added to or removed from the Index. SSGA may sell securities that are represented in the Index, or purchase securities that are not yet represented in the Index, prior to or after their removal or addition to the Index. SSGA may also utilize other pooled investment vehicles, including those managed by SSGA and its affiliates, as substitutes for gaining direct exposure to securities or a group of securities in the Index. The Strategy may at times purchase or sell index futures contracts, or options on those futures, or engage in other transactions involving the use of derivatives, in lieu of investment directly in the securities making up the Index or to enhance the Strategy's replication of the Index return. The Strategy's return may not match the return of the Index.

SSGA may implement the Strategy's asset allocations through investments in investment pools (which may, but will not necessarily, be registered under the U.S. Investment Company Act of 1940, as amended) managed or sponsored by SSGA or an affiliate. Because of the unit issuance processes employed by the various underlying investment pools, allocations by the Strategy to certain pools on a given trading day may be invested in such pools at the next trading day's net asset value per unit. This will result in the portion of the Strategy's assets being invested in such investment pools being held in cash for the trading day and may result in increased tracking error. This could adversely impact the return to any investor.

Key Facts

- Managed using an indexing strategy
- May use futures and other derivatives
- Only designated 'Securities Lending' Portfolios may lend and enter repurchase agreements (See applicable governing documents for a Portfolio's authority to lend. Participation in a securities lending program may adversely affect the investment returns and risk profile of the Portfolio. See "Securities Lending Risk; Risks of Investment of Cash Collateral" in the Strategy Disclosure Document.)
- May invest in other investment pools, including those managed by SSGA and its affiliates
- Is not a leveraged Strategy
- Will not sell securities short

For the purpose of complying with the Global Investment Performance Standards (GIPS[®]), the firm ("SSGA-Global") is defined as all portfolios managed across the global offices of State Street Global Advisors (SSGA) and SSGA Funds Management, Inc., with the exception of Charitable Asset Management which is held out to the marketplace as a distinct business entity. Prior to January 2011, SSGA-Global excluded its wrap fee business and assets accounted for on a book value basis (global cash and stable value assets). Prior to July 2017, SSGA-Global excluded Fiduciary Advisory Solutions. In January 2011, SSGA acquired the Bank of Ireland Asset Management Limited (now known as SSGA Ireland Limited), a GIPS Compliant firm. On January 01, 2012 SSGA Ireland Limited assets were merged into SSGA-Global. In July 2016, SSGA acquired the asset management and advisory services business conducted by GE Asset Management ("GEAM"), a GIPS Compliant firm. On July 01, 2017 GEAM assets were merged into SSGA-Global.

The MSCI ACWI IMI Index Composite (the "Composite"), inception date 4/1/2008, seeks to achieve the Investment Objective described above using the Investment Strategy described above, and includes portfolios managed across the global offices of SSGA-Global. To receive a complete list and description of SSGA-Global's composites and/or a GIPS[®] compliant presentation, please contact your SSGA Representative.

An investment in the Strategy is not FDIC insured, nor is it an obligation or deposit of, or guaranteed by State Street Corporation, SSGA or their affiliates.

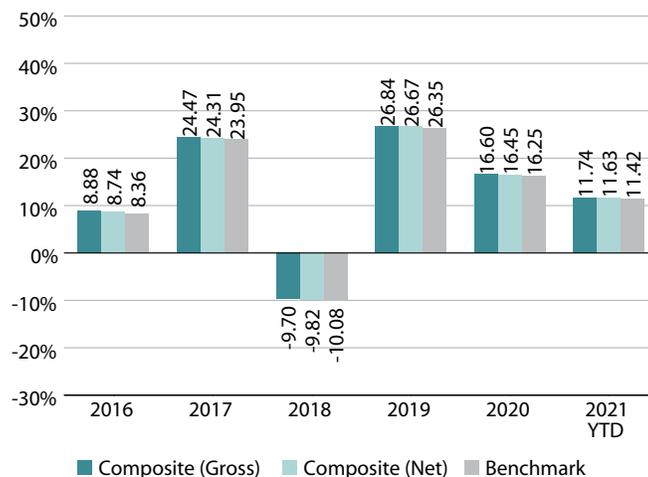
The MSCI ACWI IMI Index is a trademark of MSCI Inc.

This document provides summary information regarding the Strategy. It should be read in conjunction with the Strategy's Disclosure Document, which is available from SSGA. The Strategy Disclosure Document contains important information about the Strategy, including a description of a number of risks.

Performance

Total Returns	Composite (Gross) ^{1,2}	Composite (Net) ^{1,3}	Benchmark ⁴
Q3 2021	-1.07%	-1.10%	-1.11%
YTD	11.74%	11.63%	11.42%
1 Year	29.34%	29.17%	28.92%
3 Year	12.78%	12.64%	12.38%
5 Year	13.49%	13.34%	13.06%
10 Year	12.41%	12.26%	11.96%

Calendar Year Returns^{1,2,3,4}



1 Returns greater than one year are annualized. Returns represent past performance and are not a guarantee of future results. Current performance may differ from the performance shown. Returns shown are asset-weighted using Composite (as defined below) member market values, where the Composite member's return calculations are time-weighted and reflect the reinvestment of dividends and other income.

2 These performance figures are provided gross of fees and expenses other than actual trading fees and expenses, and reflect all items of income, gain, and loss (other than unrealized gain or loss on units of the securities lending pools held by any portfolio in the Composite). The performance figures do not take account of the mark to market value of the units of the securities lending cash collateral pools held by any of the portfolios in the Composite. If they had, the performance shown would have been lower.

3 These performance figures (i) are provided net of actual trading, audit, custody, administrative and legal fees and expenses; (ii) beginning on 9/30/2014, adjusted quarterly to reflect the highest investment management fee on the actual fee schedule, inclusive of incentive fee, if any, of any account within the Composite ("Management Fee") at the relevant time; prior to 9/30/2014, adjusted for an assumed investment management fee, which is equal to or higher than the Management Fee (except in each case certain small accounts-subject to a minimum investment management fee-may have incurred an actual investment management fee higher than that fee assumed in calculating the performance shown above); and (iii) reflect all items of income, gain and loss (other than unrealized gain or loss on units of the securities lending pools held by any portfolio in the Composite).

4 Index returns are unmanaged and do not reflect the deduction of any fees or expenses. Index returns reflect all items of income, gain and loss and the reinvestment of dividends (net of any applicable withholding tax rates) and other income and are calculated in U.S. dollars. It is not possible to invest directly in an index. Performance returns are calculated in U.S. dollars.

Supplemental Information

Characteristics

Annual Dividend Yield (Trailing 12 Months)	1.51%
Beta (Trailing 36 Months)	1.00
Composite Assets Under Management (M)	US\$47,905.66
Estimated 3-5 Year EPS Growth	16.19%
Price/Book Ratio	3.3x
Price/Earnings (Forward 12 Months)	19.0x
Standard Deviation (Annualized 36 Months)	18.42%
Total Number of Holdings	4,714
Average Market Cap (M)	US\$381,716.10

Top Holdings

APPLE INC	3.19%
MICROSOFT CORP	2.72
AMAZON.COM INC	2.01
FACEBOOK INC-CLASS A	1.10
ALPHABET INC-CL A	1.09
ALPHABET INC-CL C	1.05
TESLA INC	0.86
NVIDIA CORP	0.70
TAIWAN SEMICONDUCTOR MANUFAC	0.67
JPMORGAN CHASE & CO	0.67

Sector Allocation

Information Technology	21.38%
Financials	14.15
Consumer Discretionary	12.56
Health Care	11.66
Industrials	10.68
Communication Services	8.58
Consumer Staples	6.42
Materials	4.98
Real Estate	3.48
Energy	3.48
Utilities	2.64

Top Countries

United States	58.68%
Japan	6.50
United Kingdom	3.86
China	3.57
Canada	2.89
France	2.60
Switzerland	2.31
Germany	2.21
Australia	1.91
Taiwan	1.82

The Supplemental Information above (except for the Beta and Standard Deviation, if shown) is that of a single representative account within the Composite, which is subject to change. The representative account was chosen because it has no material restrictions and fairly represents the investment style of the Strategy. The Supplemental Information should not be deemed to be reflective of (and could differ from) the overall Composite or any other single account within the Composite. Certain Supplemental Information may be rounded to the nearest hundredth decimal and may result in the total not adding up to 100.

The Top Holdings reflect certain securities that the representative account has bought and may not be representative of the Strategy's current or future investments. In the case of fixed income and cash funds the securities are aggregated and shown at the issuer level. The Top Holdings do not include other assets or instruments that may be held by the representative account including, for example and not by way of limitation, cash or cash equivalents and derivatives such as futures, options and swaps. The figures presented are as of the date shown above, do not include the representative account's entire investment portfolio, and may change at any time. This information should not be considered a recommendation to invest in a particular sector or to buy or sell any security. It is not known whether an investment in any sectors or securities will be profitable in the future.

Characteristics are calculated using the month-end market value of holdings of the representative account, and where averages are shown these reflect the market weights of the securities in the representative account. For beta and standard deviation, if shown, these reflect Composite month-end returns. Characteristics are as of the date indicated, are subject to change, and should not be relied upon as current thereafter.

Market data, prices, and dividend estimates for characteristics calculations provided by Factset Research Systems, Inc. All other portfolio data provided by SSGA. Sector reporting based on the Global Industry Classification Standard ("GICS") which was developed by and is the exclusive property and a service mark of MSCI Inc. ("MSCI") and Standard & Poor's, a division of The McGraw-Hill Companies, Inc. ("S&P") and is licensed for use by State Street. Effective October 1, 2018, GICS renamed the "Telecommunication Services" sector to "Communication Services", which resulted in the sector reclassification of some companies.

SSGA generally delegates commodities management for separately managed accounts to SSGA FM, a wholly owned subsidiary of State Street and an affiliate of SSGA. SSGA FM is registered as a commodity trading advisor ("CTA") with the Commodity Futures Trading Commission and National Futures Association.

State Street regards the Fact Sheets in their distributed form to be complete documents that include material information regarding the Strategy for investment consideration. The whole or any part of this work may not be reproduced, copied or transmitted or any of its contents disclosed to third parties without SSGA's express written consent.

Investment Manager

The Strategy is managed by State Street Global Advisors Trust Company, a wholly owned subsidiary of State Street Bank and Trust Company, and a global leader in providing investment management solutions to clients worldwide. To learn more about SSGA, visit our web site at www.ssga.com.

Important Message About Risk

For institutional / professional investors use only.

Investing involves risk including the risk of loss of principal. Equity securities are volatile and can decline significantly in response to broad market and economic conditions. Generally, among asset classes, stocks are more volatile than bonds or short-term instruments. Stock values fluctuate in response to the activities of individual companies, the stock market and economic conditions. At times, the risk level of the Strategy may be greater than that of the U.S. stock market in general. In addition, the Strategy may use derivative instruments which may involve risks such as potential illiquidity of the markets and additional risk of loss of principal.

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The trademarks and service marks referenced herein are the property of their respective owners. Third party data providers make no warranties or representations of any kind relating to the accuracy, completeness or timeliness of the data and have no liability for damages of any kind relating to the use of such data.

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Investment Objective

The Strategy seeks an investment return that approximates as closely as practicable, before expenses, the performance of its benchmark index (the "Index") over the long term.

Benchmark

S&P GSCI® Commodity Index

Investment Strategy

The Strategy is managed using an "indexing" investment approach, by which SSGA attempts to approximate, before expenses, the performance of the Index over the long term. The Strategy will not necessarily own all, or any, of the futures contracts included in the Index.

The Strategy typically attempts to replicate the performance of the Index by entering into derivatives transactions, such as total return swap transactions, that provide a return based on the performance of the Index. In some circumstances, the Strategy may purchase the commodity futures contracts comprising the Index, in the same proportions as they are represented in the Index. In other circumstances the Strategy may attempt instead to purchase a representative selection of the futures contracts that comprise the Index, in an attempt to replicate the performance of the Index. In such a case, SSGA will select a portfolio of investments for the Strategy (which may or may not be those futures contracts included in the Index) that SSGA expects will provide a return comparable to that of the Index.

The Strategy will typically maintain a substantial cash balance. The Strategy will normally invest that cash in other short-term pooled investment vehicles sponsored, managed, or otherwise affiliated with SSGA, such as, for example, registered investment companies, private investment pools, or commingled trust funds. More information on the cash strategy is available upon request. The Strategy may at any time invest in additional or different investment vehicles, or may invest directly in short investments, in SSGA's discretion.

The Strategy's return may not match the return of the Index.

Key Facts

- Managed using an indexing strategy
- Will use futures and/or other derivatives
- May invest in other investment pools, including those managed by SSGA and its affiliates
- Will not lend its portfolio securities
- Is not a leveraged strategy
- Will not sell securities short

For the purpose of complying with the Global Investment Performance Standards (GIPS), the firm ("SSGA-Global") is defined as all portfolios managed across the global offices of State Street Global Advisors (SSGA) and SSGA Funds Management, Inc., with the exception of Charitable Asset Management which is held out to the marketplace as a distinct business entity. Prior to January 2011, SSGA-Global excluded its wrap fee business and assets accounted for on a book value basis (global cash and stable value assets). Prior to July 2017, SSGA-Global excluded Fiduciary Advisory Solutions. In January 2011, SSGA acquired the Bank of Ireland Asset Management Limited (now known as SSGA Ireland Limited), a GIPS Compliant firm. On January 01, 2012 SSGA Ireland Limited assets were merged into SSGA-Global. In July 2016, SSGA acquired the asset management and advisory services business conducted by GE Asset Management ("GEAM"), a GIPS Compliant firm. On July 01, 2017 GEAM assets were merged into SSGA-Global.

The S&P GSCI Composite (the "Composite"), inception date 9/1/2004 seeks to achieve the Investment Objective described above using the Investment Strategy described above, and includes portfolios managed across the global offices of SSGA-Global. To receive a complete list and description of SSGA-Global's composites and/or a GIPS® compliant presentation, please contact your SSGA Representative.

An investment in the Strategy is not FDIC insured, nor is it an obligation or deposit of, or guaranteed by State Street Corporation, SSGA or their affiliates.

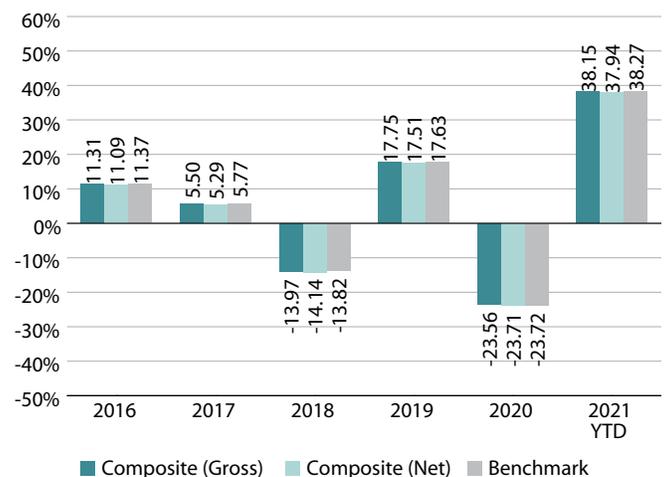
The S&P GSCI® Commodity Index (the "Index") is a product of S&P Dow Jones Indices LLC ("SPDJI"), and has been licensed for use by SSGA. Standard & Poor's® and S&P® are registered trademarks of Standard & Poor's Financial Services LLC ("S&P"); Dow Jones® is a registered trademark of Dow Jones Trademark Holdings LLC ("Dow Jones"); and these trademarks have been licensed for use by SPDJI. S&P®, S&P GSCI® and S&P GSCI® Commodity Index are trademarks of S&P and have been licensed for use by SPDJI and its affiliates and sublicensed for certain purposes by SSGA. S&P GSCI® Commodity Index is now owned, endorsed, or approved by or associated with Goldman Sachs & Co., or its affiliated companies. SSGA's investment products are not sponsored, endorsed, sold or promoted by SPDJI, Dow Jones, S&P, their respective affiliates, or their third party licensors and none of SPDJI, Dow Jones, S&P nor their respective affiliates or third party licensors makes any representation regarding the advisability of investing in such products.

This document provides summary information regarding the Strategy. It should be read in conjunction with the Strategy's Disclosure Document, which is available from SSGA. The Strategy Disclosure Document contains important information about the Strategy, including a description of a number of risks.

Performance

Total Returns	Composite (Gross) ^{1,2}	Composite (Net) ^{1,3}	Benchmark ⁴
Q3 2021	5.16%	5.11%	5.22%
YTD	38.15%	37.94%	38.27%
1 Year	58.11%	57.79%	58.30%
3 Year	-1.43%	-1.62%	-1.49%
5 Year	3.59%	3.38%	3.64%
10 Year	-4.90%	-5.10%	-4.83%

Calendar Year Returns^{1,2,3,4}



1 Returns greater than one year are annualized. Returns represent past performance and are not a guarantee of future results. Current performance may differ from the performance shown. Returns shown are asset - weighted using Composite (as defined below) member market values, where the Composite member's return calculations are time-weighted and reflect the reinvestment of dividends and other income.

2 These performance figures are provided gross of fees and expenses other than actual trading fees and expenses, and reflect all items of income, gain, and loss.

3 These performance figures (i) are provided net of actual trading, audit, custody, administrative and legal fees and expenses; (ii) beginning on 9/30/2014, adjusted quarterly to reflect the highest investment management fee on the actual fee schedule, inclusive of incentive fee, if any, of any account within the Composite ("Management Fee") at the relevant time; prior to 9/30/2014, adjusted for an assumed investment management fee, which is equal to or higher than the Management Fee (except in each case certain small accounts-subject to a minimum investment management fee-may have incurred an actual investment management fee higher than that fee assumed in calculating the performance shown above); and (iii) reflect all items of income, gain and loss.

4 Index returns are unmanaged and do not reflect the deduction of any fees or expenses. Index returns reflect all items of income, gain and loss and the reinvestment of dividends (net of any applicable withholding tax rates) and other income and are calculated in U.S. dollars. It is not possible to invest directly in an index. Performance returns are calculated in U.S. dollars.

Supplemental Information

Characteristics

Composite Assets Under Management (M)	US\$1,275.48
Standard Deviation (Annualized 36 Months)	28.61%

Index Sector Allocation

Energy	59.34%
Agriculture	18.22
Industrial Metals	11.60
Livestock	6.19
Precious Metals	4.66

Investment Manager

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Important Message About Risk

For institutional / professional investors use only.

Investing involves risk including the risk of loss of principal. Investing in commodities entails significant risk and is not appropriate for all investors. Commodity prices can be extremely volatile due to wide range of factors, such as market movements, real or perceived inflationary trends, commodity index volatility, international, economic and political changes, changes in interest rates and fluctuations in currency exchange rates. In addition, the Strategy may use derivative instruments which may involve risks such as potential illiquidity of the markets and additional risk of loss of principal.

This document provides summary information regarding the Strategy. This document should be read in conjunction with the Strategy's Disclosure Document, which is available from SSGA. The Strategy Disclosure Document contains important information about the Strategy, including a description of a number of risks.

The information provided does not constitute investment advice and it should not be relied on as such. It should not be considered a solicitation to buy or an offer to sell a security. It does not take into account any investor's particular investment objectives, strategies, tax status or investment horizon. You should consult your tax and financial advisor.

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Sector Allocations shown are that of the strategy's benchmark.

The Top Holdings reflect certain securities that the representative account has bought and may not be representative of the Strategy's current or future investments. In the case of fixed income and cash funds the securities are aggregated and shown at the issuer level. The Top Holdings do not include other assets or instruments that may be held by the representative account including, for example and not by way of limitation, cash or cash equivalents and derivatives such as futures, options and swaps. The figures presented are as of the date shown above, do not include the representative account's entire investment portfolio, and may change at any time. This information should not be considered a recommendation to invest in a particular sector or to buy or sell any security. It is not known whether an investment in any sectors or securities will be profitable in the future.

Characteristics are calculated using the month-end market value of holdings of the representative account, and where averages are shown these reflect the market weights of the securities in the representative account. For beta and standard deviation, if shown, these reflect Composite month-end returns. Characteristics are as of the date indicated, are subject to change, and should not be relied upon as current thereafter.

Market data, prices, and dividend estimates for characteristics calculations provided by Factset Research Systems, Inc. All other portfolio data provided by SSGA. Sector reporting based on the Global Industry Classification Standard ("GICS™") which was developed by and is the exclusive property and a service mark of MSCI Inc. ("MSCI") and Standard & Poor's, a division of The McGraw-Hill Companies, Inc. ("S&P") and is licensed for use by State Street. Effective October 1, 2018, GICS renamed the "Telecommunication Services" sector to "Communication Services", which resulted in the sector reclassification of some companies.

SSGA generally delegates commodities management for separately managed accounts to SSGA FM, a wholly owned subsidiary of State Street and an affiliate of SSGA. SSGA FM is registered as a commodity trading advisor ("CTA") with the Commodity Futures Trading Commission and National Futures Association.

State Street regards the Fact Sheets in their distributed form to be complete documents that include material information regarding the Strategy for investment consideration. The whole or any part of this work may not be reproduced, copied or transmitted or any of its contents disclosed to third parties without SSGA's express written consent.

Investment Objective

The Strategy seeks an investment return that approximates as closely as practicable, before expenses, the performance of its benchmark index (the "Index") over the long term.

Benchmark

Bloomberg Barclays U.S. Treasury Inflation Protected Securities (TIPS) Index

Investment Strategy

The Strategy is managed using an "indexing" investment approach, by which SSGA attempts to approximate, before expenses, the performance of the Index over the long term. The Strategy will not necessarily own all of the securities included in the Index.

The Strategy may attempt to invest in the securities comprising the Index, in the same proportions as they are represented in the Index, in limited cases where we believe it is practical to do so. However, due to the diverse composition of securities in the Index and the fact that many of the securities comprising the Index may be unavailable for purchase, it may not be possible for the Strategy to purchase some of the securities comprising the Index. In such a case, SSGA will select securities for the Portfolio that SSGA expects will provide a return comparable to that of the Index.

SSGA expects that it will typically seek to replicate Index returns for the Portfolio through investments in the "cash" markets - actual holdings of debt securities and other instruments - rather than through "notional" or "synthetic" positions achieved through the use of derivatives, such as futures contracts or swap transactions (except in the unusual case where SSGA believes that use of derivatives is necessary to achieve an exposure that is not readily available through the cash markets).

SSGA may implement the Strategy's asset allocations through investments in investment pools (which may, but will not necessarily, be registered under the U.S. Investment Company Act of 1940, as amended) managed or sponsored by SSGA or an affiliate. Because of the unit issuance processes employed by the various underlying investment pools, allocations by the Strategy to certain pools on a given trading day may be invested in such pools at the next trading day's net asset value per unit. This will result in the portion of the Strategy's assets being invested in such investment pools being held in cash for the trading day and may result in increased tracking error. This could adversely impact the return to any investor.

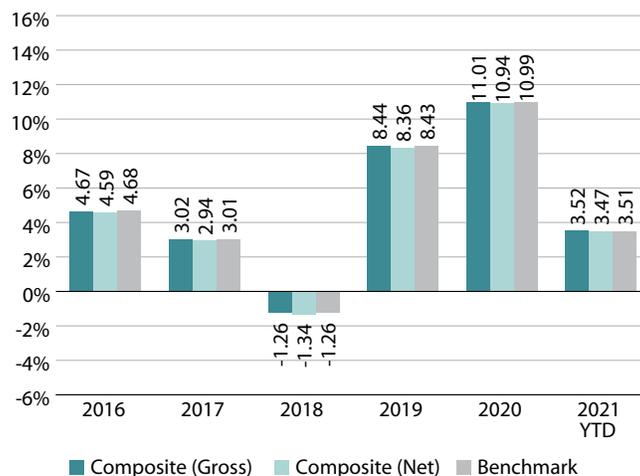
Key Facts

- Managed using an indexing strategy
- Does not normally use futures or other derivatives to create "notional" or "synthetic" index exposures
- Only designated 'Securities Lending' Portfolios may lend and enter repurchase agreements (See applicable governing documents for a Portfolio's authority to lend. Participation in a securities lending program may adversely affect the investment returns and risk profile of the Portfolio. See "Securities Lending Risk; Risks of Investment of Cash Collateral" in the Strategy Disclosure Document.)
- May invest in other investment pools, including those managed by SSGA and its affiliates
- Is not a leveraged strategy
- Will not sell securities short

Performance

Total Returns	Composite (Gross) ^{1,2}	Composite (Net) ^{1,3}	Benchmark ⁴
Q3 2021	1.76%	1.75%	1.75%
YTD	3.52%	3.47%	3.51%
1 Year	5.20%	5.14%	5.19%
3 Year	7.46%	7.38%	7.45%
5 Year	4.34%	4.27%	4.34%
10 Year	3.13%	2.98%	3.12%

Calendar Year Returns^{1,2,3,4}



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2 These performance figures are provided gross of fees and expenses other than actual trading fees and expenses, and reflect all items of income, gain, and loss (other than unrealized gain or loss on units of the securities lending pools held by any portfolio in the Composite). The performance figures do not take account of the mark to market value of the units of the securities lending cash collateral pools held by any of the portfolios in the Composite. If they had, the performance shown would have been lower.

3 These performance figures (i) are provided net of actual trading, audit, custody, administrative and legal fees and expenses; (ii) beginning on 9/30/2014, adjusted quarterly to reflect the highest investment management fee on the actual fee schedule, inclusive of incentive fee, if any, of any account within the Composite ("Management Fee") at the relevant time; prior to 9/30/2014, adjusted for an assumed investment management fee, which is equal to or higher than the Management Fee (except in each case certain small accounts-subject to a minimum investment management fee-may have incurred an actual investment management fee higher than that fee assumed in calculating the performance shown above); and (iii) reflect all items of income, gain and loss (other than unrealized gain or loss on units of the securities lending pools held by any portfolio in the Composite).

4 Index returns are unmanaged and do not reflect the deduction of any fees or expenses. Index returns reflect all items of income, gain and loss and the reinvestment of dividends (net of any applicable withholding tax rates) and other income and are calculated in U.S. dollars. It is not possible to invest directly in an index. Performance returns are calculated in U.S. dollars.

For the purpose of complying with the Global Investment Performance Standards (GIPS), the firm ("SSGA-Global") is defined as all portfolios managed across the global offices of State Street Global Advisors (SSGA) and SSGA Funds Management, Inc., with the exception of Charitable Asset Management which is held out to the marketplace as a distinct business entity. Prior to January 2011, SSGA-Global excluded its wrap fee business and assets accounted for on a book value basis (global cash and stable value assets). Prior to July 2017, SSGA-Global excluded Fiduciary Advisory Solutions. In January 2011, SSGA acquired the Bank of Ireland Asset Management Limited (now known as SSGA Ireland Limited), a GIPS Compliant firm. On January 01, 2012 SSGA Ireland Limited assets were merged into SSGA-Global. In July 2016, SSGA acquired the asset management and advisory services business conducted by GE Asset Management ("GEAM"), a GIPS Compliant firm. On July 01, 2017 GEAM assets were merged into SSGA-Global.

The U.S. TIPS Index Composite (the "Composite"), inception date 8/1/2000, seeks to achieve the Investment Objective described above using the Investment Strategy described above, and includes portfolios managed across the global offices of SSGA-Global. To receive a complete list and description of SSGA-Global's composites and/or a GIPS compliant presentation, please contact your SSGA Representative.

An investment in the Strategy is not FDIC insured, nor is it an obligation or deposit of, or guaranteed by State Street Corporation, SSGA or their affiliates.

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Supplemental Information

Characteristics

Average Credit Quality	AAA
Average Effective Convexity	1.20
Average Effective Maturity	8.18
Composite Assets Under Management (M)	US\$22,311.61
Real Duration	7.80
Real Yield	-1.43%
Total Number of Holdings	45

Credit Quality Breakdown

Aaa	100.00%
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Top Issuers

US/T	99.86%
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Sector Allocation

Treasury	99.86%
Cash	0.14

Investment Manager

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Important Message About Risk

For institutional / professional investors use only.

Investing involves risk including the risk of loss of principal. Bonds generally present less short-term risk and volatility than stocks, but are subject to: interest rate risk (as interest rates raise, bond prices usually fall); issuer default risk; issuer credit risk; liquidity risk; and inflation risk. These effects are usually more pronounced for longer-term securities. Any fixed income security sold or redeemed prior to maturity may be subject to a substantial gain or loss. In addition, the Strategy may use derivative instruments which may involve risks such as potential illiquidity of the markets and additional risk of loss of principal.

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Securities Lending

The Strategy may participate in an agency securities lending program (the "Lending Program") sponsored by State Street Bank and Trust Company ("State Street") for the purpose of lending the Strategy's securities and investing the collateral in a collateral reinvestment fund (each a "Collateral Pool"). None of the Collateral Pools are FDIC-insured bank deposits or otherwise guaranteed by SSGA or State Street or any of their respective affiliates. Investors may lose money by participating in the Lending Program and through investments in a Collateral Pool. For more information, including the risks associated with participating in the Lending Program you should review the SSGA Securities Lending Program Disclosure and the disclosure document and fact sheet for the relevant Collateral Pool.

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Market data, prices, and estimates for characteristics calculations provided by Bloomberg Portfolio Risk and Analytics Schedule of Services (PORT+). Average Credit Quality reflects market value weight of all the rated securities held by the portfolio (excludes unrated securities) using the middle rating provided by either S&P, Moody's and Fitch or lower if only two agency ratings are available. All other portfolio data provided by SSGA. Characteristics are as of the date indicated, are subject to change, and should not be relied upon as current thereafter. Fixed income asset class and country reporting based on Bloomberg Barclays indices which are trademarks of Bloomberg Barclays Inc. and have been licensed for use by State Street. Bloomberg Barclays or its affiliates ("Bloomberg Barclays") shall not be liable for any inaccuracies or errors with respect to any data or Index referenced herein, nor does Bloomberg Barclays sponsor, endorse or promote the Strategy.

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[Click Here for COVID-19 Related Resources](#)

FISCAL REPORT

PUBLIC EDUCATION'S POINT OF REFERENCE FOR MAKING EDUCATED DECISIONS

Ask SSC . . . School Closure Options Amidst the COVID-19 Surge

 [BY LEILANI AGUINALDO](#)

 [BY PATTI F. HERRERA, EDD](#)

 [BY WENDI MCCASKILL](#)

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posted January 7, 2022

Q. What options do local educational agencies (LEAs) have, if any, to close schools given the surge in COVID-19 cases?

A. Unsurprisingly, we have received many questions this week related to school closure options in the midst of the Omicron variant, and it feels like déjà vu from exactly a year ago when COVID-19 positivity rates were also escalating. We recognize the pressures school leaders face in this situation and that any consideration of physically closing schools is one that you approach with great care and with the safety of your students and staff at the forefront.

To answer these questions, it's important to remember that LEAs must abide by minimum instructional day requirements—180 school days for school districts and 175 school days for charter schools. This is in addition to [requirements](#) for minimum instructional minutes, which vary by grade span.

Emergency Days

With this in mind, if an LEA decides it must close schools completely, one option that may be available is to utilize emergency days already built into or added to the school calendar. Sometimes also known as “snow days,” this option would allow an LEA to immediately close schools for a certain number of days and make up the days later in the school year, as determined based on the school calendar. As such, the LEA retains the number of days in the school year, and there is no need to seek a J-13A waiver to protect against loss in attendance based funding or instructional time.

J-13A Attendance and Instructional Time Requests

While the J-13A process is still available for losses in attendance and instructional time resulting from extraordinary conditions such as fire, flood, or earthquakes, recent changes in statute significantly narrow the availability of the J-13A process for impacts related to COVID-19. Under [Education Code Section \(EC §\) 41422](#), from September 1, 2021, to June 30, 2022, LEAs may not use the J-13A process to mitigate losses of

average daily attendance (ADA) based funding “if the school closure was due to impacts from COVID-19,” with only a few exceptions. LEAs may pursue approval of a J-13A to avoid losses of attendance-based funding for students with disabilities whose Individualized Education Program does not provide for independent study and for closure of community day schools related to COVID-19. In addition, a J-13A request may be filed for school closures necessitated by a COVID-19-related staffing shortage.

In the event of a school closure due to a severe staffing shortage, J-13As may be submitted if the following conditions are met:

- Unable to provide in-person instruction due to staffing shortages as a result of staff quarantine due to COVID-19
- Exhausted all options for obtaining staff coverage
- Consulted with the county office of education and the State Superintendent of Public Instruction in determining that staffing needs cannot be met through any option

It should also be noted all J-13A requests must now include a plan to offer independent study to all impacted students within ten days after the first day of the qualifying event. Additional information about J-13A requests submitted during the 2021-22 school year is available on the California Department of Education’s [website](#).

Remote Instruction

If an LEA is considering pivoting to remote instruction, then this must be done within the construct of the independent study statutes, which makes shifting to 100% remote learning problematic. Previous Fiscal Report articles have detailed independent study requirements (see “[Budget Trailer Bill Reinforces Independent Study for Quarantines](#)” in the September 2021 *Fiscal Report*), and the important detail to reinforce here is that students and parents must opt-in to independent study by completing a required learning agreement. Per EC § [5174.7](#) and [5174.9.6](#), students may not be required to participate in independent study, including remote learning, and must retain the option for in-person instruction. With the exception of students participating in independent study either due to quarantine for exposure to, or infection with, COVID-19 pursuant to local or state health guidance or COVID-19-related school closure, students participating in independent study who do not have the option of in-person instruction cannot generate ADA for funding purposes. Students that must isolate or quarantine because of COVID-19 should already be captured by an LEA’s independent study plans for these situations. To the extent that LEAs have not already captured signed learning agreements for students that must isolate or quarantine because of COVID-19, all independent study agreements need to be completed within 30 days of the commencement of independent study.

We recognize the tremendous and never-ending challenges that all LEAs face amidst the pandemic, and we remain hopeful that 2022 will soon improve. All of us at School Services of California Inc. remain here to assist you the best that we can.