

Purpose and Background

1. Individual member data is stored by OCERS in electronic format. Data for individual members is generally accessible utilizing OCERS' pension administration software. Summary data for groups of members may require the expenditure of substantial staff resources to create reports. It is this latter type of request that is being addressed by this policy.

The Board of Retirement recognizes that transparency is integral to good governance. In order to achieve the mission and objectives of OCERS, the Board must establish a mechanism for responding to requests for summary data from individual Board members, plan sponsors, plan members, and other stakeholders such as employee and retiree groups. Requests for information from external parties such as the media, political action groups, and individuals unaffiliated with OCERS shall be governed by the Orange County Employees Retirement System Public Records Request Policy.

Policy Objectives

2. The objectives of the policy are to provide guidance to staff and assist in responding to requests for data from Board members, plan sponsors, plan members, and other stakeholders.

Policy Guidelines

3. OCERS should carry out its duties in the spirit of open governance.
4. A member or benefit recipient is entitled to access to his or her own records and may authorize access by another person or entity by providing written authorization to OCERS. Generally, Member Services staff is authorized to provide copies of member records to the member or an authorized recipient. Documents marked as "Confidential" or "Legal" communications should not be provided to the member unless authorized by the Legal Department.
5. All requests for data by plan sponsors and other stakeholders shall be routed to an Assistant CEO or the Chief Legal Officer.
6. Requests for data that are readily available should be satisfied as quickly as possible.
7. Records exempt from disclosure under applicable law shall not be disclosed unless the requesting party fulfills the requirements for disclosure under the applicable law. Staff responding to data requests should review and be familiar with the OCERS Public Records Request Policy to ensure compliance with disclosure rules.
8. Requests from individual Board members shall be addressed to the CEO.
9. Requests from plan sponsors, plan members, and other stakeholders that require minimal staff time to prepare and less than \$1,000.00 in estimated staff costs shall be satisfied at no cost to the requestor except for copying costs if applicable. Minimal staff time would be defined as four hours or less of programming, analysis, data compilation, or other staff time.
10. Requests from plan sponsors, plan members, and other stakeholders that require estimated staff costs in excess of \$1,000.00 shall be referred to the Board for consideration. The Board shall determine whether OCERS will seek reimbursement for costs from the requesting party.

Policy Review

11. The Board of Retirement will review this policy at least every three (3) years to ensure that it remains relevant and appropriate.

Policy History

12. The Board of Retirement adopted the Data Request Policy on August 27, 2007. The Board reviewed the policy on June 21, 2010. The Board revised the policy on March 19, 2012, December 14, 2015 and October 15, 2018.

Secretary's Certificate

I, the undersigned, the duly appointed Secretary of the Orange County Employees Retirement System, hereby certify the adoption of this policy.



10/15/18

Steve Delaney
Secretary of the Board

Date