

**SANTA BARBARA COUNTY EMPLOYEES'  
RETIREMENT SYSTEM**

**REPORT TO THE BOARD OF RETIREMENT**

**FOR THE FISCAL YEAR ENDED JUNE 30, 2022**

**SANTA BARBARA COUNTY EMPLOYEES'  
RETIREMENT SYSTEM**

**TABLE OF CONTENTS**

	<u>Page</u>
I. Required Communication to the Members of the Board of Retirement in Accordance with Professional Standards (SAS 114).....	1
II. Independent Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i> .....	5
III. Agreed Upon Conditions Report Designed to Increase Efficiency, Internal Controls, and/or Financial Reporting (Management Letter).....	7

---

**REQUIRED COMMUNICATION TO THE MEMBERS OF THE BOARD OF  
RETIREMENT IN ACCORDANCE WITH PROFESSIONAL STANDARDS (SAS 114)**

To the Board of Retirement of  
Santa Barbara County Employees' Retirement System  
Santa Barbara, California

We have audited the basic financial statements of Santa Barbara County Employees' Retirement System (SBCERS), a component unit of the County of Santa Barbara, California, for the fiscal year ended June 30, 2022. Professional standards require that we provide you with information about our responsibilities under auditing standards generally accepted in the United States of America and *Government Auditing Standards*, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our letter to you dated June 17, 2022. Professional standards also require that we communicate to you the following information related to our audit.

**Significant Audit Matters**

*Qualitative Aspects of Accounting Practices*

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by SBCERS are described in Note 3 to the basic financial statements. No new accounting policies were adopted and the application of existing policies was not changed during fiscal year ended June 30, 2022. We noted no transactions entered into by SBCERS during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the basic financial statements in the proper period.

Accounting estimates are an integral part of the basic financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the basic financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting SBCERS' basic financial statements were:

Management's estimate of the fair value of investments was derived by various methods as detailed in Note 3 – Summary of Significant Accounting Policies and Note 4 – Deposits and Investments to the basic financial statements. We evaluated the key factors and assumptions used to develop the estimate of the fair value of investments in determining that it is reasonable in relation to the basic financial statements taken as a whole.

The contribution amounts, net pension liability, and net other post-employment benefits (OPEB) liability as detailed in Note 3 – Summary of Significant Accounting Policies, Note 6 – Pension Plan Contributions, Note 7 – Net Pension Liability of Participating Employers, and Note 8 – OPEB Plan, which are based on the actuarially presumed interest rate and assumptions. We evaluated the key factors and assumptions used to develop the contribution amounts, net pension liability, and net OPEB liability in determining that they are reasonable in relation to the basic financial statements taken as a whole.

Certain financial statement disclosures are particularly sensitive because of their significance to financial statement users. The most sensitive disclosures affecting the basic financial statements were:

The disclosures of deposits and investments in Note 3 and Note 4 which were derived from SBCERS' investment policy. Management's estimate of the fair value of estimates was determined by various methods as detailed in the notes to the basic financial statements.

Additionally, the disclosures related to the funding policies, net pension liability, net OPEB liability, and actuarial methods and assumptions in Note 3, Note 6, Note 7, and Note 8 were derived from actuarial valuations, which involve estimates of the value of reported amounts and probabilities about the occurrences of future events.

The financial statement disclosures are neutral, consistent, and clear.

#### *Difficulties Encountered in Performing the Audit*

We encountered no significant difficulties in dealing with management in performing and completing our audit.

#### *Corrected and Uncorrected Misstatements*

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. The attached schedule summarizes misstatements detected as a result of audit procedures that were corrected by management.

#### *Disagreements with Management*

For purposes of this letter, a disagreement with management is a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of our audit.

#### *Management Representations*

We have requested certain representations from management that are included in the management representation letter dated December 27, 2022.

#### *Management Consultations with Other Independent Accountants*

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to SBCERS' basic financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

#### *Other Audit Findings or Issues*

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as SBCERS' auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

#### **Other Matters**

We applied certain limited procedures to Management's Discussion and Analysis (MD&A), Changes in Net Pension Liability and Related Ratios, Employer Pension Contribution History, Money-Weighted Rate of Return - Pension, and Money-Weighted Rate of Return - OPEB, which are required supplementary information (RSI) that supplement the basic financial statements. Our procedures consisted of inquiries of management regarding the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We did not audit the RSI and do not express an opinion or provide any assurance on the RSI.

We were engaged to report on the Schedule of Administration Expense – Pension, Schedule of Pension Investment Expense, Schedule of Consultant Payments – Pension, and the Schedule of Administration Expense – OPEB, which accompany the basic financial statements but are not RSI. With respect to this other supplementary information, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United States of America, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the basic financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the basic financial statements or to the basic financial statements themselves.

We were not engaged to report on the introduction, investment, actuarial, statistical, and glossary sections, which accompany the basic financial statements but are not RSI. We did not audit or perform other procedures on this other information, and we do not express an opinion or provide any assurance on it.

**Restriction on Use**

This information is intended solely for the use of Board of Retirement and management of SBCERS and is not intended to be, and should not be, used by anyone other than these specified parties.

BROWN ARMSTRONG  
ACCOUNTANCY CORPORATION

*Brown Armstrong  
Accountancy Corporation*

Bakersfield, California  
December 27, 2022

**SBCERS**  
**SUMMARY OF CORRECTED MISSTATEMENT**  
**June 30, 2022**

	<u>Increase in Fiduciary Net Position (in 000's)</u>
Known Audit Difference:	
Difference from timing of real estate fair value reporting	<u>\$                  17,785</u>
Total Corrected Misstatement	<u><u>\$                  17,785</u></u>

**INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER  
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS  
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN  
ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS**

To the Board of Retirement of  
Santa Barbara County Employees' Retirement System  
Santa Barbara, California

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of Santa Barbara County Employees' Retirement System (SBCERS), a component unit of the County of Santa Barbara, California, as of and for the fiscal year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise SBCERS' financial statements, and have issued our report thereon dated December 27, 2022.

**Report on Internal Control Over Financial Reporting**

In planning and performing our audit of the basic financial statements, we considered SBCERS' internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the basic financial statements, but not for the purpose of expressing an opinion on the effectiveness of SBCERS' internal control. Accordingly, we do not express an opinion on the effectiveness of SBCERS' internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of SBCERS' financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that were not identified.

**Report on Compliance and Other Matters**

As part of obtaining reasonable assurance about whether SBCERS' basic financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, and contracts, noncompliance with which could have a direct and material effect on the,

financial statements. However providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

**Purpose of This Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the SBCERS' internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering SBCERS' internal control and compliance. Accordingly, this report is not suitable for any other purpose.

BROWN ARMSTRONG  
ACCOUNTANCY CORPORATION

A handwritten signature in blue ink that reads "Brown Armstrong Accountancy Corporation". The signature is written in a cursive, flowing style.

Bakersfield, California  
December 27, 2022

**AGREED UPON CONDITIONS REPORT DESIGNED TO INCREASE  
EFFICIENCY, INTERNAL CONTROLS, AND/OR FINANCIAL REPORTING  
(MANAGEMENT LETTER)**

To the Board of Retirement of  
Santa Barbara County Employees' Retirement System  
Santa Barbara, California

In planning and performing our audit of the basic financial statements of Santa Barbara County Employees' Retirement System (SBCERS), a component unit of the County of Santa Barbara, California as of and for the fiscal year ended June 30, 2022, in accordance with auditing standards generally accepted in the United States of America, we considered SBCERS' internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the basic financial statements, but not for the purpose of expressing an opinion on the effectiveness of SBCERS' internal control. Accordingly, we do not express an opinion on the effectiveness of SBCERS' internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of SBCERS' basic financial statements will not be prevented, or detected and corrected on a timely basis.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses. In addition, because of inherent limitations in internal control, including the possibility of management override of controls, misstatements due to error or fraud may occur and not be detected by such controls. Given these limitations during our audit, we did not identify any deficiencies in internal control that we considered to be material weaknesses. However, material weaknesses or significant deficiencies may exist that were not identified.

The result of our audit disclosed no recommendations that would result in opportunities for strengthening internal controls and operating efficiencies. We are providing the disposition of the prior year comments.

**Current Year Findings and Recommendations**

No current year findings or recommendations.

## Status of Prior Year Findings and Recommendations

### 2021-1 - Census Data Provided to Actuary

During our active participant testing, we confirmed member samples with the Actuary as of the June 30, 2020 valuation date. The Actuary furnished us with five (5) active members to be verified with the participants' files and PensionGold. Upon testing the Actuary's five (5) active members, we noted one (1) sample tested for the pensionable annual salary for the fiscal year ended June 30, 2020 did not agree with the pensionable annual salary in PensionGold. This resulted in an additional \$1,293.50 of pensionable annual salary being reported for this active member in the census data sent to the Actuary. Management indicated that the uniform allowance (UFD) pay code was being incorrectly included as pensionable pay in the census data extract that was sent to the Actuary. PensionGold reflected the correct pensionable pay. The census data error affected two-hundred and thirty-four (234) members totaling \$257,304 and two-hundred and fifty-two (252) members totaling \$199,396 for the fiscal years ended June 30, 2020 and 2021, respectively. SBCERS is working with LRS to resolve the actuarial extract in PensionGold and has informed the Actuary of the corrected amounts. The Actuary does not consider this error to have a significant impact on the valuation.

SBCERS current census data extract procedures are as follows: 1) the preparer randomly samples a handful of members review prior to submitting to the Actuary; 2) there is no current process in place to require another individual to review the census extract; and 3) as the extract process is automated and only pensionable salary is reviewed for the handful of individuals that are selected to review prior to sending to the actuary, the UFD pay code was not reviewed. Management indicated that when PensionGold v3 was implemented in July 2019, there was extensive testing of data fields of the actuarial extract.

#### Recommendation

We recommend SBCERS review its existing process of the census data and implement a more comprehensive internal review of the census data that is provided to the actuary. The review should include recalculating a representative sample of pay codes to ensure only pensionable pay codes are included in the census data information prior to submitting to the Actuary. Additionally, another individual should also review the Census data prior to submitting to the Actuary.

#### Management's Response

We concur with the finding. SBCERS has initiated a comprehensive review of the compilation of the actuarial extract with our pension administration vendor to determine the cause and verify the accuracy. We intend to expand the verifications methods through additional and expansive reporting as well as sample selection reviews to ensure the accuracy of the actuarial extract data.

#### Current Year Status

Implemented.

### 2021-2 - Other Post-Employment Benefits (OPEB) Closing Transactions and Actuarial Reports

During our review of SBCERS OPEB Plan actuarial GASB 74/75 Report as of June 30, 2022, we noted a discrepancy in investment income of \$73,000 when compared to the OPEB Plan's Fiduciary Net Position.

Upon inquiry with SBCERS, we were made aware that there were two transactions that were not reflected in the General Ledger as of June 30, 2022, as they were cleared in July. The transactions related to purchases, sales, and transfers that did not fully execute prior to June 30, 2022 closing, which resulted in unrecorded investment purchase of \$4,100,000, short-term investment fund of \$4,100,000, and interest receivable of \$73,000. This did not have a net effect on the Statement of Plan Fiduciary Net Position as they were netted against short term investments, but did result in investment income to be understated by \$73,000.

Management indicated the financial statements are compared to the General Ledger and to the Custodian, BNY Mellon, to ensure transactions are properly included. However, management does not have a current process or procedure in place to reconcile the actuarial reports to the financial statements.

Recommendation

We recommend SBCERS implement a more comprehensive internal review to reconcile the financial statements to the Custodian records and to incorporate into their closing process to review cut-off transactions to ensure any transactions that were uncleared at the end of the fiscal year at properly recorded and corresponding receivables and payables properly presented in the financial statements.

Additionally, we recommend SBCERS implement a procedure to review and reconcile the financial statements to the actuarial reports and investigate any discrepancies that are identified.

Management's Response

We concur with this finding. We will comprehensively review the OPEB investment journal entry process and make improvements reconcile to the correct reports from the Custodian. This will include implementing a more comprehensive peer review and a cutoff date for transactions at the end of the fiscal year.

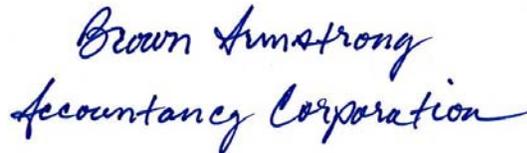
Current Year Status

Implemented.

\*\*\*\*\*

This communication is intended solely for the use of Board of Retirement and management of SBCERS and is not intended to be, and should not be, used by anyone other than these specified parties.

BROWN ARMSTRONG  
ACCOUNTANCY CORPORATION

Handwritten signature in blue ink that reads "Brown Armstrong Accountancy Corporation".

Bakersfield, California  
December 27, 2022