

**Public School Retirement System of the City of St. Louis**  
**Education, Travel, Code of Ethics Policies, Document, and Missing Members/Beneficiaries**

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Missouri Statutes §§105.450, 105.452, 105.454, and 105.458 describe certain prohibited acts by elected and appointed public officials and employees which apply to trustees who serve on the Board of Trustees (the “Board”) of the Public School Retirement System of the City of St. Louis (the “System”) and the individuals the Board employs. For reference, copies of the relevant statutes are attached.

Above and beyond these broad statutes, the Board believes it is prudent to adopt specific additional policies that establish high, ethical standards for the System’s trustees and employees. In this regard, education, travel, and code of ethics policies are contained herein. These policies have been adopted by the Board to provide standards for trustee and employee behavior and to protect the System from the implications of actual and/or perceived improprieties.

Education Policy

As fiduciaries of PSRSSTL, Trustees are expected to be capable of performing their duties and responsibilities. To that end, each Trustee should be educated sufficiently to discharge the obligations of the position. Pursuant to Section 105.666, RSMo., the Board has established this Board Education Policy applicable to all Trustees.

*A. New Trustee Orientation Program*

Within ninety days of assuming the position of Trustee, new Trustees shall complete six hours of education in a New Trustee Education Program. The curriculum of the New Trustee Education Program shall include, at minimum, the following:

- Duties and responsibilities of Trustees;
- Ethics;
- Governance process and procedures;
- Pension plan design and administration of benefits;
- Investments, including but not limited to the fiduciary duties as defined under Section 105.688, RSMo.;
- Legal liability and risks associated with the administration of a plan;
- Sunshine law requirements under chapter 610;
- Actuarial principles and methods related to plan administration; and
- The role of staff and consultants in plan administration.

*B. Trustee Education Policy*

- Each Trustee is responsible for evaluation of the Trustee’s educational needs and obtaining knowledge of specific subject matter.
  - Trustees who have served one or more years shall attend at least a total of two hours of continuing education programs each year in the curriculum areas described above.
  - Trustees shall routinely inform the Executive Director of their attendance at any continuing education program, and which shall include but is not limited to date, time, length, location, education material, and any facilitator utilized. The Trustees designate the Executive Director to maintain a record of such information and the Executive Director shall complete a certification that the Trustee’s annual continuing education requirements were satisfied.
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*Publications, Subscriptions, Membership Dues*

- The System will pay for an annual subscription to “Pensions & Investments” on behalf of each trustee.
- The System will pay membership dues for the National Council on Teacher Retirement (NCTR), the National Association of Securities Professionals (NASP), and the Missouri Association of Public Employee Retirement Systems (MAPERS).

*Conferences, Workshops*

- The Board has authorized Trustees and the Executive Director to attend conferences sponsored by the NCTR, NPPFA, NASP, at the national level, and MAPERS. Attendance at other educational conferences will be authorized by specific Board approval on a case by case basis. Within sixty days of attending such a conference, the Trustee shall provide a short written report to the Executive Director regarding the educational seminars he/she attended at such a conference.
- From time to time, the Board will invite its professional staff and its investment managers to conduct workshops on specific issues related to pension management.
- On an annual basis, at least two education and training workshops are to be provided by the investment consultant, investment managers or other professionals at a location in or around the St. Louis Metropolitan Area as approved by the Board of Trustees.

### **Travel Policy**

The Travel Policy is intended to provide for the payment of reasonable and proper expenses of the trustees and employees of the System which are actually incurred, appropriately documented, and in connection with the performance of an individual’s duties to the System. Travel to educational conferences sponsored by NCTR, NASP, and MAPERS has been authorized by the Board. Travel to other conferences and to business meetings requires specific Board approval.

Trustees and employees who are attending approved educational conferences or business meetings will be responsible for making their own travel arrangements and reservations. Trustees and employees who are planning to attend conferences which have been pre-approved under the System’s Education Policy must advise the Executive Director in advance of their intention to attend. The Executive Director will include such information under the Report of the Executive Director at the next regularly scheduled meeting of the Board in order that minutes of the Board meetings will reflect attendance at pre-approved conferences.

The Board encourages trustees and employees to book travel plan arrangements at least fourteen (14) days during the school year and twenty-one (21) days during the summer break in advance to the extent reasonably practical.

After their return, individuals will be required to submit a Travel Expense Voucher to the Retirement Office and will be subject to the same documentation requirements for the payment of reasonable expenses whether they use the Reimbursement Method or Advance Method, both of which are described below.

Except in situations involving emergencies such as illness or work-related demands, individuals will be responsible for any changes in travel costs as a result of voluntarily changing a booked and paid travel itinerary. If travel is cancelled or not completed by the individual and a travel advance has been paid by the System, then individuals must file a Travel Expense Voucher and reimburse any amount owed the System.

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### ☞ *Reimbursement Method*

Individuals using the Reimbursement Method will pay their expenses and, within thirty (30) days of their return, submit Travel Expense Vouchers (sample attached) and proper documentation and receipts to the Retirement Office for reimbursement. The Retirement Office will reimburse individuals for approved travel expenses within ten (10) days of final approval of their Travel Expense Vouchers.

### ☞ *Advance Method*

Individuals using the Advance Method may request an advance from the Retirement Office for anticipated expenses for registration fees, transportation and lodging by completing the appropriate form and providing documentation that shows the anticipated expenses. Within thirty (30) days of returning from their trips, individuals **must** submit Travel Expense Vouchers (sample attached) and proper documentation and receipts to the Retirement Office, and

- if their advances exceed their approved, actual expenses, they must reimburse the System for the difference within ten (10) days of final approval of their Travel Expense Vouchers, or
- if their approved, actual expenses exceed their advances, the Retirement Office will reimburse them for the difference within ten (10) days of final approval of their Travel Expense Vouchers.
- Any trustee or employee who fails to timely submit a Travel Expense Voucher, or to timely reimburse the System the amount of any over-advanced money shall not be entitled to request any further advances or make any System related travel plans until such time as the appropriate Travel Expense Voucher has been submitted, finally approved, and any over-advanced money reimbursed to the System.
- The Executive Director will include information on Trustees ineligible to travel under the Report of the Executive Director at the next regularly scheduled meeting of the Board.

### ☞ *Receipts*

- An itemized receipt **must** be submitted for all expenditures, if receipts are normally available for the type of expense incurred. For example, receipts are normally available for meals, parking and taxi fare, but not from a doorman or bellhop. Credit card or cash summary receipts that do not itemize expenses may not be accepted.
- A receipt from a travel agent is **not** acceptable for transportation expenditures. Rather, individuals must submit a ticket stub or passenger receipt from the carrier.
- If a receipt includes expenses for another individual, the relationship of the other individual to the System will determine whether the expense will be paid by the System.
  - ◆ For example, if one trustee pays for meals for several trustees, such that the expenditure would have been reimbursable if it had been paid individually by the other trustees, the entire expenditure would be reimbursable to the trustee who paid for the meals. The trustee who paid for the meals should indicate on the receipt the names of the individuals for whom the expenses were incurred and their relationship to the System.
  - ◆ On the other hand, if a receipt includes an expenditure for the meal of a trustee's spouse or guest, an adjustment should be made to exclude that expense and so noted on the receipt.

### ☞ *Payable Days*

Payable expenses may be incurred during one-day traveling to and one-day traveling from an approved conference or meeting, and while in attendance at the conference or meeting. In cases where a trustee or employee intends to request payment for an extended stay, such individual must submit to the Executive Director, at least 48 hours prior to traveling to the conference or meeting, a written statement detailing the savings to the System resulting from the extended stay. Within 24 hours after receipt of any such written

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statement, the Executive Director shall notify the trustee or employee that such written statement: (1) appears in compliance with the Travel Policy and will be recommended for final approval; (2) raises issues or concerns that will need to be resolved by the Board or appropriate committee of the Board responsible for administering this Travel Policy (the “Committee”). The Committee shall be appointed by the Chairperson of the Board and shall be representative of the Board in composition.

Expenses incurred as the result of an individual’s extended stay which exceed the limits of this Travel Policy will not be payable by the System.

### **✎ *Transportation Expenses***

- Payable transportation expenses will be the lesser of reasonable coach airfare or, if alternative transportation is utilized, the actual cost of alternative transportation.
- Payable transportation expenses will include the cost of public transportation to and from the airport or the cost of long-term airport parking.
- In cases where individuals use automobiles which they own or lease, payable cost will be determined by actual miles driven on the most direct route at the current mileage rate permitted by the Internal Revenue Code. Expenses incurred as the result of a detour taken voluntarily by the individual will not be paid by the System.
- Generally, car rental fees will not be paid by the System; however, the System will reimburse an individual for car rental fees for the days of a conference plus arrival and departure days in the event of an unusual situation where renting a car will result in lower overall cost than alternative transportation, such as taxis or shuttle buses. In cases where an individual is requesting reimbursement for car rental expenditures, such individual must comply with the procedures set forth above regarding additional day’s stays to establish that the overall cost of renting a car will be less costly than available alternative transportation.

### **✎ *Personal Expenses***

Generally, expenses of a personal nature, such as recreational expenditures or additional expenses incurred on behalf of a spouse or guest, are **not** reimbursable. However, reasonable expenses for long distance telephone calls to an individual’s family and employer shall be paid by the System and shall not be included under any maximum daily living expense allowance established by the Board. To provide additional guidance regarding “reasonable” long distance telephone expenses, the Board would deem it reasonable for individuals to call their families and employers once a day during their absences; however, lengthy or numerous long distance telephone calls should be explained in writing and payment will be subject to approval by the Committee.

### **✎ *Approval Process***

- The Executive Director will conduct an initial review of Travel Expense Vouchers to assure that submitted expenditures are in compliance with the System’s Travel Policy, that advances have been properly recorded, and that appropriate documentation has been included. As a part of the initial review process, the Executive Director will discuss issues of concern with the trustee or employee who submitted the voucher for payment. At the conclusion of the initial review process, the Executive Director will forward Travel Expense Vouchers to the Committee with a recommendation (a) to pay the voucher as submitted, or (b) to scrutinize specified expenditures that do not appear to be addressed by or in compliance with the System’s Travel Policy.
  - The Committee will be responsible for final approval of Travel Expense Vouchers in cases where the expenditures are addressed by and in compliance with the System’s Travel Policy; however, payment of expenditures that are not included as payable under the System’s Travel Policy and/or reimbursement of extraordinary or unanticipated expenditures will require full Board approval.
  - In the event the Committee, or the full Board, if full Board approval is required, is unable to determine if a specific expenditure is payable, the Committee, or the Board, shall obtain advice from the System’s legal
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counsel and/or its accounting firm to assist them in coming to an appropriate conclusion which is consistent with the spirit of the Travel Policy and applicable law.

- With respect to the payment of travel expenses, the decision of the Committee, or the Board, as the case may be, will be final.

### **Code of Ethics Policy**

The Uniform Management of Public Employee Retirement Systems Act (UMPERSA) defines a trustee as a person having ultimate authority to manage a retirement system or to invest or manage its assets. Section 7 of the Act describes General Fiduciary Duties as follows:

“A trustee or other fiduciary shall discharge duties with respect to a retirement system:

- (1) solely in the interest of the participants and beneficiaries;
- (2) for the exclusive purpose of providing benefits to participants and beneficiaries and paying reasonable expenses of administering the system;
- (3) with the care, skill and caution under the circumstances then prevailing which a prudent person acting in like capacity and familiar with those matters would use in the conduct of an activity of like character and purpose;
- (4) impartially, taking into account any differing interests of participants and beneficiaries;
- (5) incurring only costs that are appropriate and reasonable; and
- (6) in accordance with a good-faith interpretation of the law governing the retirement program and system.”

It is a trustee’s duties of loyalty and care to the participants and beneficiaries of the System that create standards prohibiting conflicts of interest and requiring trustees and employees to act with the highest level of ethical responsibility in the performance of their duties. This Code of Ethics Policy addresses conflicts of interest and situations that can appear to be conflicts of interest from two perspectives: (a) as they relate directly to trustees and employees of the System, and (b) as they relate to the professionals employed by the System, such as investment consultants, money managers, brokerage firms, insurance brokers, attorneys, auditors, actuaries, custodians, etc.

#### ***☞ Trustees and Employees***

Trustees and employees, by their conduct, shall not create a reasonable basis for the impression or perception that any person, organization or firm can influence them in the performance of their official acts or actions. In this regard, any trustee/employee relationship or association with a current or prospective vendor must be directly beneficial to the System, or must be reasonably expected to provide the trustee or employee with educational assistance that will be immediately relevant to his/her duties to the System. A trustee’s duty of loyalty also includes the obligation not to be influenced by the interest of any third party, including an obligation to subjugate the interests of the party who appointed the trustee, for example, the union or plan sponsor, to the interests of the participants and beneficiaries of the System.

#### ➤ **Gifts and Gratuities**

- ◆ Trustees and employees shall not solicit or accept contributions or gifts (to include lodging, transportation, or invitations to social/sporting events) from any single current or prospective vendor which exceed a value totaling \$50 in any calendar year. Trustees and employees shall disclose on the Annual Disclosure Statement any and all contributions or gifts (to include lodging, transportation, or invitations to social/sporting events) that were extended to a relative, spouse or guest of the Trustee or employee. However, the limitation on gifts does not apply:
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- a) to business meals/receptions where a representative of the vendor is present for the purpose of conducting business or providing education,
  - b) to seminars/conferences sponsored by a vendor or prospective vendor where attendance is approved by the Board of Trustees or the System's Travel Policy,
  - c) to participation in recreational or social events while attending a seminar/conference, provided said events are available to a majority of the seminar/conference attendees,
  - d) to participation in recreational or social events sponsored by a vendor or prospective vendor provided attendance is expected to benefit the System and provided attendance is reported on the trustee's/employee's Annual Disclosure Statement.
- ◆ Trustees and employees shall not solicit or accept contributions or gifts from current or prospective vendors for their own personal benefit or in behalf of any third party.
  - ◆ Trustees and employees shall not solicit or accept contributions or gifts from current or prospective vendors if they know, or reasonably should know, that such contributions or gifts are intended to influence their actions or decisions with respect to the System.
  - ◆ If a trustee or employee receives an unsolicited, prohibited contribution or gift, he/she should return such contribution or gift to the source; however, if returning the contribution or gift is not possible or feasible, the contribution or gift should be donated to a charitable organization.

➤ Personal Investments/Obligations

Trustees and employees shall not make personal investments, engage in transactions or professional activities, or incur obligations of any nature which would create, or which the trustee or employee should reasonably foresee would create, a substantial interest in a business, contract, property, or investment that would result in a significant or continuing conflict of interest, or the appearance of a conflict of interest, with the System.

➤ Confidential Information

Trustees and employees shall not use confidential information pertaining to the System, or confidential information obtained by reason of their position with the System, for the purpose of personal gain or gain for a third party, nor, except as may be required by law, shall they disclose confidential information pertaining to the System to any person not authorized by the Board to receive such confidential information.

➤ Nepotism

On the basis of objective qualifications and competitive cost, the System may elect to hire or retain the relative of a trustee or employee; however, it will be incumbent upon the trustee or employee to disclose such a relationship to the Board as early in the evaluation and selection process as is reasonably possible.

➤ Annual Disclosure Statement

- ◆ No later than January 31st each year, every trustee and employee of the System shall complete an Annual Disclosure Statement (sample attached) which will be received by and maintained in the Retirement Office for a period of at least five (5) years.
  - ◆ The Executive Director will include information on Trustees and employees that are in noncompliance with the Annual Disclosure Statement at the first regularly scheduled meeting of the Board each year, usually in February, under the Report of the Executive Director.
  - ◆ A trustee or employee who fails to file an Annual Disclosure Statement by January 31st, or who violates the System's Code of Ethics Policy, will be subject to sanctions, at the discretion of the Board, up to
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and including removal from office or employment termination.

## **☞ Vendors**

At the time a vendor is hired/retained, and thereafter, on or about November 1st each year, every vendor who conducts business with the System will receive a copy of the System's Code of Ethics Policy. Vendor copies will contain a form to be returned to the System on which vendors will acknowledge receipt and acceptance of the System's Policy. If the System learns that a vendor has violated the Code of Ethics Policy without a prior written waiver from the Board, the vendor's contract will be terminated and the vendor will not be eligible to do business with the System for a period of at least two (2) years.

## **DOCUMENT RETENTION AND DESTRUCTION POLICY**

(As Adopted June 21, 2021)

### **Authority and Purpose**

1. This Document Retention and Destruction Policy for the Public School Retirement System of the City of St. Louis ("Retirement System" or "Board") identifies the record retention responsibilities of employees and staff in relation to the Retirement System's documents/records.
2. Under the Board's enabling statute, the Board may establish rules and regulations for the administration of the Retirement System, which includes but is not limited to, maintenance and disposal of records under its control. § 169.450.8, R.S.Mo.
3. This Document Retention and Destruction Policy is intended to establish timeframes for the retention and destruction of Retirement System records for the orderly and efficient operation of the Retirement System.

### **Policy Objectives**

4. The objectives of the policy are to ensure that the Retirement System:
  - a. Properly maintains its records for the appropriate time period; and
  - b. Properly destroys records once the appropriate time period has passed; and
  - c. Staff is apprised of the retention periods and destruction method for the records entrusted to their care.

### **Record Definition**

5. As used in this policy the term "record", shall, unless the context clearly requires otherwise, mean any document, book, paper, photograph, sound recording or other material, regardless of physical form or characteristics (including electronic mail and other electronically stored documents), made or received pursuant to law or in connection with the transaction of official business.
6. Any other artifact not incorporated into the definition of a "record" shall be a "nonrecord" and not subject to document retention as outlined by this policy. Nonrecords shall include material made or acquired and preserved solely for reference, extra copies of documents preserved only for convenience or reference, other materials that do not record the position of the Retirement System, and stocks of publications and of processed documents which are not included in the definition of "record" and not treated as a record.

### **Litigation Holds**

7. Whenever the Retirement System learns that litigation against the Retirement System is reasonably anticipated, threatened or pending, the Executive Director shall notify the Retirement System's Legal Advisor. The Legal Advisor will inform the Executive Director which documents should be held.
  8. The litigation hold applies to electronic and hard copy documents including email correspondence, work drafts, notes, memoranda, correspondence, photographs, videotape recordings and other documents
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pertaining to the litigation as determined by the Legal Advisor. All documents pertaining to the litigation in the possession of the Retirement System must be preserved until the later of (i) the applicable time period set forth for preservation of the record under these guidelines, or (ii) the date the Legal Advisor informs the Retirement System that the litigation hold is no longer in effect.

### **Timelines for Document/Record Retention**

If a document/record falls into two or more different timelines below, the document/record should be kept for the longer period of time applicable to the document/record.

1. **Permanent Documents/Records**: These documents/records must be retained permanently by the Retirement System:

- a. Governance Records*

- i. Minutes of all Board meetings, including regular and committee meetings.
- ii. Rules and Regulations of the Retirement System, including any and all documents (such as policies) incorporated by reference.
- iii. Newsletters
- iv. Board Resolutions
- v. Bylaws and other organizational documents/records.
- vi. Plan records and documents incorporated therein by reference.
- vii. Member Handbooks
- viii. Retirement Guides
- ix. Administrative Procedures for Charter Schools handbook
- x. Annual certifications of amount to be paid to Retirement System
- xi. Documents/records related to purchase/sale of real property, such as purchase agreements, deeds, purchase price and cost of all permanent improvements.
- xii. Important legal documents/records.
- xiii. Actuarial Reports.
- xiv. Comprehensive Annual Financial Report (CAFR).
- xv. Auditor financial reports.
- xvi. Notarized documents/records
- xvii. Stock certificates
- xviii. Election certification letters issued by Trustee Election Commissioner
- xix. Trustee certifications issued by Circuit Clerk
- xx. Documents/records that cannot be clearly, accurately or completely transferred to an electronic recordkeeping system.

- b. IRS and Audit Documents and Related Records*

- i. IRS tax exemption determination letters and related correspondence.
- ii. Audits and investigations performed by any private entity, state or federal agency, including, but not limited to the IRS or State Auditor.

- c. Member Records*

- i. The following records will be kept permanently in an electronically imaged format. Paper copies of the following records will be retained for at least five (5) years following the Member's death or the last payment made to the Member's beneficiary.
  1. All documents/records which substantiate a Member's benefit such as reports, hours submitted on the Member's behalf, pension benefit statements, employer

- paycheck stubs, employer payroll records, marital status records, age and service records that are used to determine eligibility, vesting, and benefits, etc.
2. Support orders and tax levies.
  3. Death certificates.
  4. Beneficiary designations and election forms.
  5. Any documents/records related to any benefit denials and any appeals related thereto.
  6. Applications and enrollment documentation/records.
2. Government Filings: These documents/records must be retained by the Retirement System for at least seven (7) years following the end of the plan year during which the document/record was filed with the applicable government agency:
- a. Paper copies of any Federal, state and local tax returns and all supporting documentation. Electronic copies of any Federal, state and local tax returns will be permanently maintained.
  - b. All documents/records required to be filed with the IRS or State of Missouri and all supporting documentation if such documents/records are not specifically set out with a longer retention period herein.
3. Contracts, Insurance and Investments: These documents/records must be retained by the Retirement System for at least ten (10) years following their termination date or in the case of insurance claims and accident reports, at least ten (10) years following the resolution of the matter:
- a. Service provider contracts
  - b. Investment documents/records
  - c. Insurance policies, accident reports and claims
  - e. Lease agreements
  - f. Bonds
4. Financial Records: The following records must be kept for at least seven (7) years:
- a. Accounts payable
  - b. Credit Card Statements (and itemized receipts for each credit card charge)
  - c. Paid and cancelled checks
  - d. Expense reports
  - e. Bank records (including statements and bank deposit slips)
  - f. Receipts and cash disbursement journals
  - g. Vendor invoices
  - h. Vouchers for expenditures
  - i. Internal financial reports and statements
5. Request for Proposals: The following records must be kept for at least seven (7) years:
- a. Request for proposals
  - b. Responses of unsuccessful bidders to request for proposals (responses by successful bidders will be kept for at least ten years after the life of the contract pursuant to #3 above)
6. Trustee Election Records: The following records must be kept for at least seven (7) years:
- a. All records relating to the election of Trustees pursuant to § 169.450.1, R.S.Mo., such as form ballot and instructions, completed ballots, candidate biographies (other than the election
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certification letters issued by Trustee Election Commissioner and the certifications issued by Circuit Clerk, which as noted above under #1, will be kept permanently)

7. Employee Document/Records:

- a. *FLSA and Missouri Unemployment Records* - The following documents/records must be kept for at least seven (7) years from the date of the last data entry for the employee.
  - i. Regular rate of pay and its calculation.
  - ii. Hours worked each workday and workweek, including substantiating documentation/records such as time cards, piecework records and earnings records.
  - iii. Straight-time earnings and overtime earnings.
  - iv. Wage attachment or garnishment records shall be retained for as long as the attachment or garnishment remains active and for at least an additional seven (7) years.
  - v. Inclusion and exclusions from wages (such as bonuses, withheld taxes, garnishments, etc.).
  - vi. Date of payment and the period covered.
- b. *Other Employee/Employment Records* - The following documents/records should be retained for at least seven (7) years following the employee's termination date:
  - i. Employee's names, addresses, social security number, date of birth, and occupation.
  - ii. Employee's date of hire and termination/separation.
  - iii. I-9s, W-2s, 1099s, and other government forms completed related to the employee's employment.
  - iv. Employee's time and payroll records.
  - v. Documentation/records related to resume/application materials, job descriptions, hiring and termination/separation, evaluations, compensation information, promotions, transfers, disciplinary matters, leave/comp time/FMLA.
  - vi. Any other documents not referenced above that is contained in an Employee's personnel file.
- c. Records including injury logs and workers' compensation records will be retained according to the "Contracts, Insurance, and Investments" section of this policy for ten (10) years following the resolution of the matter.
- d. Reimbursement payments to the Board and Staff members shall be retained for four (4) years.
- e. *Independent Contractor Records* – Documents/records which set out the basis or prove independent contractor status, contracts, written agreements, etc., must be retained for at least four (4) years following the independent contractor's departure date.

8. Other Records: Any documents/records not falling into any of the categories set out above must be kept for at least seven (7) years from the end of the last plan year when they were last in effect.

9. Exceptions: Exceptions to these rules and terms for retention may be granted only by the Executive Director or Board of Trustees.

**Destruction of Documents/Records**

Any documents/records relating to the Retirement System, which contain confidential information for the Retirement System, or any individually identifiable information or protected health information for the Retirement System's

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Members, beneficiaries or dependents, such as names, addresses, telephone numbers, social security numbers, dates of birth, member numbers, etc. should be destroyed in such a way as to render the documents/records completely unreadable, unusable and unable to be restored, such as through shredding, burning, etc. for paper documents/records and clearing the data off electronic media in such a way that it cannot be recovered. It is never acceptable to dispose of documents/records containing protected health information, individually identifiable information or confidential information by disposing of the documents/records in dumpsters or other containers that are accessible by the public or other unauthorized persons.

Electronic media containing confidential information, protected health information, or individually identifiable information should not be sold or given to third parties or disposed of in a way where it is usable even if it is believed all such information has been removed from the electronic media. Oftentimes remnants of information originally stored on electronic media remain even after steps have been taken to erase the data; thus, once the Retirement System is done with the electronic media on which the protected health information, individually identifiable information or confidential information was stored, the electronic media should be destroyed in such a way it is rendered unusable.

Anytime a third party is used to destroy documents/records/electronic media, the Retirement System should obtain written certification from the third party that the documents/records/ electronic media were properly destroyed.

Examples of confidential information include legal documents/records, bank documents/records, etc.

### **Electronic Storage for Paper Documents/Records**

Except as otherwise stated herein, certain paper documents/records can be converted to electronic format and the original paper version of the document/record destroyed. The following rules will be followed in relation to converting paper documents/records into electronic documents/records:

- a. The Retirement System shall at all times maintain a record keeping system that has reasonable controls to ensure the integrity, accuracy, authenticity and reliability of any electronic documents/records. The Retirement System's electronic documents/records must be maintained in a secure storage environment and must have back-ups created regularly. The Retirement System must have a quality assurance program that includes regular evaluations of the electronic recordkeeping system to ensure electronic documents/records continue to be safely stored and retrievable.
  - b. The Retirement System must maintain proper controls to ensure paper documents/records that are scanned and electronically stored will not be altered from their original form. The Retirement System must maintain any paper copies of documents/records that cannot be clearly, accurately, or completely transferred to an electronic version. No employee may alter any scanned electronic document/record. All paper documents/records scanned and stored electronically, must remain unaltered.
  - c. The Retirement System must maintain the electronic documents/records in a reasonable order and in a safe and accessible place and in such a way that they can be readily inspected or examined.
  - d. The Retirement System must maintain the electronic documents/records in such a way that they are readily convertible into legible and readable paper copies.
  - e. The Retirement System must ensure the electronic record keeping system is not subject to any restriction that would compromise any person's ability to comply with any reporting or disclosure requirement under the law.
  - f. Once the originals of certain documents/records have been scanned and stored electronically, the originals can be destroyed except where the original documents/records have legal significance or inherent value or cannot be stored adequately in electronic format such as in the following instances:
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- i. Notarized documents/records
- ii. Stock certificates
- iii. Original signed governance documents/records
- iv. Original signed real estate documents/records such as purchase and sale agreements and real estate deeds
- v. Documents/records that cannot be clearly, accurately or completely transferred to an electronic recordkeeping system.

POLICY AND PROCEDURES FOR LOCATING MISSING MEMBER DATA  
AND MISSING MEMBERS/BENEFICIARIES

As Adopted October 24, 2022

**Policy:** It is the policy of the Public School Retirement System of the City of St. Louis (“PSRSSTL” or “Fund”) to ensure that where feasible, member records are complete and members/beneficiaries entitled to benefits receive same. The Board of Trustees for the PSRSSTL adopts the following procedures for locating missing members/beneficiaries.

**Procedures:** The following procedures have been created to locate missing member data and missing members/beneficiaries:

1. **Missing Member Data:** The Fund’s records pertaining to a member should contain, at a minimum, the member’s full name, address, telephone number (either cell or home), Social Security number, date of birth, marital status, and beneficiary designation. If a member is married, the Fund’s records should also contain the spouse’s full name. The Fund is entitled to rely on any data already contained in its files as accurate until such time as the Fund has actual knowledge that its records are inaccurate. In the event the Fund’s records do not contain the minimum data identified above, or it has come to the Fund’s attention that any item of said data is inaccurate, the Fund or its designated representative will, to the extent it is reasonable under the circumstances to do so, perform the following steps to locate the missing data:
  - a. The first step in locating missing member data will be to contact the member and request the missing data. If the Fund has a telephone number on file for the member, a call will be made to the member to obtain the missing data. If the member cannot be reached by telephone, a certified letter will be sent to the member requesting the missing data, to the extent an address is available in the Fund’s files and said action is reasonable given the circumstances.
  - b. If the data cannot be obtained from the member using step (a) above and it is reasonable in the circumstances to do so, reasonable attempts will be made to obtain a valid address or telephone number for the member by contacting one or more of the following parties (to the extent the parties are known to the Fund):
    - i. contributing employer(s) for whom the member worked;
    - ii. beneficiary named by the member on any beneficiary designation form filed with the Fund;
    - iii. the applicable local affiliate of the American Federation of Teachers;
    - iv. the Missouri Retired Teachers Association and Public School Personnel (MRTA); and
    - v. any other employee benefit plan in which the member/beneficiary participated that is permitted to release the information under applicable law.

If any of the above sources are reluctant to release the above information, the Fund may seek to have any of the above sources contact the member directly or forward a letter to the member from the Fund. If a potential telephone number for the member is obtained, then the Fund will attempt to

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call the member to obtain the missing data. If the member cannot be reached by telephone, and a potential address is obtained for the member from one of the sources listed above, a certified letter will be sent to the member at the alternate address requesting the missing data to the extent it is reasonable under the circumstances to do so.

- c. If the data cannot be obtained using steps (a) or (b) above and it is reasonable given the circumstances to do so, reasonable attempts will be made to search for missing member data using Internet search tools that do not charge a fee. Such online services include Internet search engines, public record databases (such as those for licenses, mortgages and real estate taxes), obituaries and social media.
- d. If the data cannot be obtained using steps (a)-(c) above, the Fund or its designated representative will evaluate whether and to what extent additional search steps, including Internet search tools, commercial locator services, credit reporting agencies, information brokers, investigation databases and analogous services that involve charges, are appropriate and should be used in searching for the missing member data.

In evaluating whether and to what extent steps (a) thru (d) above should be performed, the Fund or its designated representative will take into consideration the type of data that is missing, the size of a member's account balance, the labor and cost involved in performing the applicable steps, as well as any other circumstances deemed relevant to the evaluation.

- 2. Missing Members/Beneficiaries: If a member/beneficiary who is entitled to receive a benefit payment cannot be located, the PSRSSTL will take the following steps to locate the member/beneficiary, but only to the extent each step is reasonable given the circumstances:

- a. The first step in locating a missing member/beneficiary will be to attempt to contact the member/beneficiary using the information in the Fund's files. If a telephone number is on file for the member/beneficiary, the Fund will attempt to call the member/beneficiary. If the member/beneficiary cannot be reached by telephone, a certified letter will be sent to the member/beneficiary notifying him/her that a benefit may be available from the Fund, to the extent an address is available in the Fund's files and said action is reasonable given the circumstances.
- b. If the member/beneficiary cannot be located using (a) above and it is reasonable given the circumstances to do so, the Fund will make reasonable attempts to obtain a valid address or telephone number for the member/beneficiary by contacting the following parties (to the extent the parties are known to the Fund):
  - i. contributing employer(s) for whom the member worked;
  - ii. beneficiary named by the member on any beneficiary designation form filed with the Fund;
  - iii. the applicable local affiliate of the American Federation of Teachers;
  - iv. the Missouri Retired Teachers Association and Public School Personnel (MRTA); and
  - v. any other employee benefit plan in which the member/beneficiary participated that is permitted to release the information under applicable law.

If any of the above sources are reluctant to release the above information, the Fund may seek to have any of the above sources contact the member/beneficiary directly or forward a letter to the member/beneficiary from the Fund. If a potential telephone number for the member/beneficiary is obtained, then the Fund will attempt to call the member/beneficiary to notify him/her that a benefit may be available from the Fund. If the member/beneficiary cannot be reached by telephone, and a potential address for the member/beneficiary is obtained from one of the sources listed above, a certified letter will be sent to the member/beneficiary at the alternate address notifying him/her that

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a benefit may be available from the Fund, to the extent it is reasonable under the circumstances to do so.

- c. If the information cannot be obtained through (a) or (b) above and it is reasonable given the circumstances to do so, the Fund will make reasonable use of internet search tools that do not charge a fee to search for the missing member/beneficiary. Such online services include internet search engines, public record databases (such as those for licenses, mortgages and real estate taxes), obituaries and social media.
- d. If steps (a)-(c) above have been followed and the member/beneficiary could not be found, the Fund or its designee will evaluate whether and to what extent additional search steps, including internet search tools, commercial locator services, credit reporting agencies, information brokers, investigation databases and analogous services that involve charges, are appropriate in searching for the missing member/beneficiary. In evaluating whether to use additional search steps to locate a missing member/beneficiary, the Fund or its designee will take into consideration the size of the member/beneficiary's account balance and the cost of further search efforts.

In evaluating whether and to what extent steps (a) thru (d) above should be performed, the trustees or their designated representative will take into consideration the size of a member/beneficiary's account balance, the labor and cost involved in performing the applicable steps, as well as any other circumstances deemed relevant to the evaluation.

If after taking steps (a)-(d) above, where appropriate under the circumstances, the member/beneficiary could not be found and the benefit payment is left unclaimed, and if no estate can be found to have been opened, then the accumulated contributions shall escheat to the State of Missouri in compliance with applicable law.

(Appendix A, Revised 10-24-22)

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**Public School Retirement System of the City of St. Louis**  
**Expense and Contingency Reserve Policy**

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The amount to be held in the Expense and Contingency Reserve should be re-determined as of each January 1. The amount of the Reserve should consist of an expense reserve and an investment contingency reserve. Effective January 1, 1996, the Reserve will be determined as follows:

The expense portion should be the sum of

1. The estimated annual operating expenses for the ensuing year;
2. An amount equal to the liability for non-insurance supplements;
3. An amount equal to the liability for insurance supplements for those members participating in the program on January 1; and
4. The estimated amount of insurance supplements to be paid for members expected to retire and participate in the program during the ensuing year.

The investment contingency portion of the Reserve is intended to cover significant shortfalls in the rate of return, not small shortfalls. When a significant negative deviation occurs, the Reserve will be used to reduce the shortfall. If on the other hand, the assumed rate of return is exceeded by a significant amount, a portion of the excess return will be added to the investment contingency portion of the Reserve.

The Reserve to be adjusted as follows:

In the case of a shortfall

1. If the shortfall is less than 1%, no adjustment is made.
2. If the shortfall is between 1% and 2%, then the Reserve is reduced by one-half the amount of the shortfall.
3. If the shortfall exceeds 2%, then the Reserve is reduced an amount equal to the amount by which the rate of return falls short of the assumed rate of return less 1%. (For example, if the assumed rate is 6.5%, the actual rate is 4%, then the Reserve is reduced by amount equal to 1.5%. In this case, the rate of return after supplement from the Reserve would be equal to 5.5%.)
4. If the investment contingency portion of the Reserve is insufficient to meet the requirement in 2 or 3, then the reduction in the Reserve is equal to the investment contingency portion of the Reserve.

In case of excess return

1. If the rate of return does not exceed the assumed rate by at least 1%, then no addition is made to the Reserve.
2. If the rate of return exceeds the assumed rate by between 1% and 2%, then the Reserve is increased by one-half the amount of excess return.
3. If the rate of return exceeds the assumed rate by more than 2%, then the Reserve is increased by the amount by which the rate of return exceeds the assumed rate of return plus 1%.

The amount added to the reserve under 2 and 3 is subject to a maximum. The maximum amount of the investment contingency portion of the Reserve is equal to 5% of the market value of the Retirement Fund.