## Audit Management Letter Comments for the Year Ended 06/30/20

## Fiscal Year 2019-20

## **Observation #1: Review of Financial Statement Classifications**

BDO observed that a portion of the Government issued Treasury Bills that had short term maturities were inappropriately recorded in Global Debt Securities instead of Short-Term Investments. Also, BDO observed that a non-employer contribution made was classified inappropriately as an employer contribution. Although these classification errors were not material either quantitatively or qualitatively, both reclassifications were proposed by BDO and corrected by management. The errors appear to be as a result of a lack of internal control in place to review all financial statement categories for proper classification for financial reporting purposes. These errors and the subsequent corrections had no impact on total investments or total additions but only a change within the correct financial statement line item.

In order to record correct classification of each type of financial statement category, CalPERS management should implement a control during year end to review all financial statement categories to assess whether reclassifications are necessary including for investments and additions to ensure each financial statement area is properly classified.

**Financial Office's Current Update:** OPEN. As BDO noted, the classification errors discovered during last year's closing of our books were all corrected and had no material effect on our statements. Because the recommended improvements in internal processes relate to a once-a-year process, BDO will not be able to assess the design and implementation of the improved internal processes and controls until we close our 2020-21 books this summer, which is why the scheduled implementation has been shown as September 2021. In the meantime, we did want to update you on the steps we have taken to date to improve our processes. Specifically, the Investment Office is working with State Street to record assets upon receipt and subsequent position categorization in Fund Accounting. These changes will be implemented prior to the end of the fiscal year. As the independent verifier of investment holdings, the Financial Office has developed a process through Bloomberg to look up classifications separately at year end.