

CalPERS Investment Policy for the California Employers' Retiree Benefit Trust Fund

Effective Date

This policy is effective as of October 1, 2022, and supersedes all previous California Employers' Retiree Benefit Trust (CERBT) Fund policies.

Contents

Introduction	2
Strategic Objective	2
Responsibilities	2
Investment Approach & Parameter	2
Investment Constraints/ Limitations	3
Glossary of CalPERS Specific Terms	3
Policy Document History	3
Appendices	3
Appendix 1: Reporting to the Investment Committee	3
Appendix 2: Investment Responsibilities	4
Appendix 3: Investment Constraints/Limitations	5
Appendix 4: Policy Document History	7

Introduction

The California Public Employees' Retirement System (CalPERS) Total Fund Investment Policy, adopted by the CalPERS Investment Committee (Committee), sets forth CalPERS' overarching investment beliefs, purposes, and objectives with respect to all its investment programs.

This document sets forth the investment policy (Policy) for the policy portfolios (Portfolios) of the California Employers' Retiree Benefit Trust Fund (Fund). The design of this Policy ensures that investors, managers, consultants, and other participants selected by CalPERS take prudent and careful action while managing the Portfolios. Additionally, use of this Policy ensures sufficient flexibility in managing investment risks and returns associated with the Fund.

The Fund was established March 1, 2007 for public employers to prefund their retiree health and other post-employment benefit obligations. The Fund is currently known in statute as the Annuitants' Healthcare Coverage Fund. There are three separate Portfolios (Strategy 1, Strategy 2, and Strategy 3) for the Fund, that provide employers a choice of asset allocation strategies.

This Policy should be read in conjunction with and is subject to applicable conditions contained within the CalPERS [Total Fund Investment Policy](#). This Policy shall also be managed to comply with all applicable Investment Office policies.

Strategic Objective

The Fund seeks to offer to employers distinct investment alternatives given their specific liabilities and cash flow needs.

Responsibilities

Details regarding various levels of responsibility for this Fund are provided in Appendix 1, Reporting to the Investment Committee, and Appendix 2, Investment Responsibilities.

Investment Approach & Parameter

A. Performance Objective and Benchmark

The benchmark for the Portfolios is specified in the CalPERS Total Fund Investment Policy benchmark appendix.

B. Strategic Asset Allocation Process

A comprehensive Asset Allocation Strategy analysis shall be completed periodically that follows the schedule and process as described in the CalPERS Total Fund Investment Policy, Asset Allocation Strategy Section, and Reporting to the Investment Committee appendix. As further described in the Asset Allocation Strategy Section, the schedule may be altered to accommodate pending Board actions.

C. Restrictions, Prohibitions and Authorized Securities

Restrictions, Prohibitions and Authorized Securities of the Fund are governed by the CalPERS Total Fund Investment Policy for internal funds and defined in each Manager’s contract with CalPERS for external funds.

All transactions involving derivatives are governed by the CalPERS Total Fund Investment Policy, Global Derivatives and Counterparty Risk Section.

Investment Constraints/ Limitations

See Appendix 3 for Fund investment constraints/limitations.

Glossary of CalPERS Specific Terms

Bold italicized terms appearing in the Policy are CalPERS specific in nature and are defined in the [CalPERS Specific Glossary of Terms](#).

Policy Document History

See Appendix 4 for historical details of Investment Committee adoption and revisions of this Policy.

Appendices

Appendix 1: Reporting to the Investment Committee

The following tables provide details regarding reporting to the Investment Committee:

1. Investment Office Staff
2. ***General Pension Consultant***

Table 1: Investment Office Staff Reporting Responsibilities

Ref #	Report Content	Frequency
1.	Staff shall provide a review that will include, but is not limited to, asset class allocations compared to Policy targets and ranges (as applicable), current market value, performance, and risk metrics.	No less than annually
2.	Staff shall report concerns, problems, material changes, and all violations of the Policy. These reports shall include explanations of any violations and appropriate recommendations for corrective action	At the next Committee meeting, or sooner if deemed necessary

Table 2: General Pension Consultant Reporting Responsibilities

Ref #	Report Content	Frequency
1.	The Consultant shall monitor, evaluate, and report on the performance of the Fund relative to the benchmarks and this Policy and other applicable CalPERS Policies.	No less than annually

Appendix 2: Investment Responsibilities

The following sections provide details regarding investment related responsibilities for the:

- Investment Committee
- Investment Office Staff
- **General Pension Consultant**
- **External Manager**

Investment Committee Responsibilities

1. Approve asset classes for investment and set a policy target allocation, permissible range, and benchmark for each asset class.

Investment Office Staff Responsibilities

1. All aspects of portfolio management, including monitoring, trading, analyzing, evaluating performance relative to the appropriate benchmark, and selecting and contracting with managers.
2. Provide individualized asset allocation strategy recommendations to the Committee, including selection of asset class benchmarks, and Policy targets and ranges.
3. Manage the asset class allocations of the Fund within Policy ranges approved by the Committee, in accordance with Policy guidelines.
4. Monitor internal and external managers in the implementation of, and compliance with, the Policy.
5. Develop and maintain investment procedures, program guidelines, and sub-program guidelines.

General Pension Consultant Responsibilities

1. Provide independent perspective and counsel to the Committee, to include routine communication with the Investment Office Staff and periodic reviews of processes and procedures.

External Manager Responsibilities

1. Manage the Fund in accordance with each manager’s contract with CalPERS and the Policy.

2. Communicate and cooperate with Investment Office Staff and authorized third parties regarding the management of the Fund.

Appendix 3: Investment Constraints/Limitations

Portfolio Asset Class Allocation Targets & Ranges

The following tables provide details regarding the asset allocation targets and ranges for each CERBT strategy. Upon adoption of significant policy changes, Staff will implement the changes within a reasonable time period.

Table 3: Allocation Targets and Ranges – Strategy 1, Effective October 1, 2022

Asset Class	Policy Target	Policy Range Relative to Target
Global Equity	49%	+/- 5%
Fixed Income	23%	+/- 5%
Treasury Inflation-Protected Securities (TIPS)	5%	+/- 3%
Commodities	3%	+/- 3%
Real Estate Investment Trusts (REITs)	20%	+/- 5%
Liquidity*	0%	+ 2%
Total	100%	

*The Liquidity asset class is constrained to frictional/operational cash flows

Table 4: Allocation Targets and Ranges – Strategy 2, Effective October 1, 2022

Asset Class	Policy Target	Policy Range Relative to Target
Global Equity	34%	+/- 5%
Fixed Income	41%	+/- 5%
Treasury Inflation-Protected Securities (TIPS)	5%	+/- 3%
Commodities	3%	+/- 3%
Real Estate Investment Trusts (REITs)	17%	+/- 5%
Liquidity*	0%	+ 2%
Total	100%	

*The Liquidity asset class is constrained to frictional/operational cash flows.

Table 5: Allocation Targets and Ranges – Strategy 3, Effective October 1, 2022

Asset Class	Policy Target	Policy Range Relative to Target
Global Equity	23%	+/- 5%
Fixed Income	51%	+/- 5%
Treasury Inflation-Protected Securities (TIPS)	9%	+/- 3%
Commodities	3%	+/- 3%
Real Estate Investment Trusts (REITs)	14%	+/- 5%
Liquidity*	0%	+ 2%
Total	100%	

*The Liquidity asset class is constrained to frictional/operational cash flows.

Target Tracking Error

The Portfolios will be managed in a manner that minimizes any tracking error.

Appendix 4: Policy Document History

Table 6: CERBT Fund Policy History

Date	Detail
2011-06-15	Approved by the Policy Subcommittee
2011-08-15	Adopted by the Investment Committee
2013-12-03	Administrative changes to update template format and to align this policy with the Global Derivatives and Counterparty Risk Policy
2014-05-15	Administrative changes to standardize reporting frequencies to the Investment Committee to “no less than annually”
2014-05-15	Administrative changes to reflect the Policy Glossary of Terms Update Project
2014-10-13	Approved by the Investment Committee
2016-03-14	Approved by the Investment Committee. Previous versions of the California Employers’ Retiree Benefit Trust Fund Policy were reformatted to align with investment policy updates incorporated during the Investment Policy Revision Project
2018-10-01	Administrative changes to the strategic asset allocation targets and ranges as approved by the Committee on May 14, 2018 (agenda item 5a).
2019-01-04	Administrative changes made to migrate policy into an accessible template.
2022-10-01	Administrative changes to the strategic asset allocation targets and ranges as approved by the Committee on March 14, 2022 (agenda item 7b).

The CERBT Fund Policy was previously the Annuitants’ Healthcare Coverage Fund Policy and Attachment A of the Affiliate Fund Policy. Tables 7 and 8 below reflect the revision history of those documents.

Table 7: Affiliate Fund Policy History

Date	Detail
2008-08-18	Approved by the Policy Subcommittee
2008-09-15	Adopted by the Investment Committee
2008-12-15	Revised by the Investment Committee
2009-06-16	Administrative changes made due to Policy Review Project
2009-09-28	Administrative changes due to adoption of Benchmark Policy

Table 8: Annuitants’ Healthcare Coverage Fund (Policy consolidated into the Affiliate Fund Policy) History

Date	Detail
2006-12-15	Approved by the Policy Subcommittee

2006-12-18	Adopted by the Investment Committee
2008-08-18	Repealed by the Policy Subcommittee
2008-09-15	Administrative changes made due to Policy Review Project