

Crowe LLPIndependent Member Crowe Global

The Audits and Risk Management Committee of the Teachers' Retirement Board of California State Teachers' Retirement System West Sacramento. California

Professional standards require that we communicate certain matters to keep you adequately informed about matters related to the audits noted below that are, in our professional judgment, significant and relevant to your responsibilities in overseeing the financial reporting process. We communicate such matters in this report.

We have audited the Schedule of Proportionate Share of Contributions for Employers and Nonemployer Contributing Entity of State Teachers' Retirement Plan ("STRP" or the "Plan"), a plan administered by the California State Teachers' Retirement System ("CalSTRS" or the "System"), as well as total net pension liability as of June 30, 2022, total deferred outflows of resources, and total deferred inflows of resources (specified caption totals) included in the Schedule of Aggregate Pension Amounts for Employers and Nonemployer Contributing Entity.

It should be noted that throughout this report, the term "financial statements" refers to the basic financial statements of the System and "schedules" refer to the Schedule of Proportionate Share of Contributions for Employers and Nonemployer Contributing Entity and Schedule of Aggregate Pension Amounts for Employers and Nonemployer Contributing Entity of the STRP.

AUDITOR'S RESPONSIBILITY UNDER AUDITING STANDARDS GENERALLY ACCEPTED IN THE UNITED STATES OF AMERICA

Our responsibility is to form and express opinions about whether the Schedule of Proportionate Share of Contributions for Employers and Nonemployer Contributing Entity and total net pension liability as of June 30, 2022, total deferred outflows of resources, and total deferred inflows of resources (specified caption totals) included in the Schedule of Aggregate Pension Amounts for Employers and Nonemployer Contributing Entity, that have been prepared by management with your oversight are presented fairly, in all material respects, in conformity with accounting principles generally accepted in the United States of America. The audits of the Schedule of Proportionate Share of Contributions for Employers and Nonemployer Contributing Entity and total net pension liability as of June 30, 2022, total deferred outflows of resources, and total deferred inflows of resources (specified caption totals) included in the Schedule of Aggregate Pension Amounts for Employers and Nonemployer Contributing Entity do not relieve you of your responsibilities and does not relieve management of their responsibilities. Refer to our engagement letter with the System for further information on the responsibilities of management and Crowe LLP.

AUDITOR'S RESPONSIBILITY UNDER GOVERNMENT AUDITING STANDARDS

As part of obtaining reasonable assurance about whether the Plan's schedules are free of material misstatement, we performed tests of the Plan's compliance with certain provisions of laws, regulations, contracts, and agreements, noncompliance with which could have a direct and material effect on the determination of schedule amounts or disclosures. 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.

COMMUNICATIONS REGARDING OUR INDEPENDENCE FROM THE PLAN

Auditing standards generally accepted in the United States of America require independence for all audits, and we confirm that we are independent auditors with respect to the Plan under the independence requirements established by the American Institute of Certified Public Accountants.

Additionally, we wish to communicate that we have no relationships with the Plan that, in our professional judgment, may reasonably be thought to bear on our independence and that we gave significant consideration to in reaching the conclusion that our independence has not been impaired.

PLANNED SCOPE AND TIMING OF THE AUDIT

We are to communicate an overview of the planned scope and timing of the audit. Accordingly, the following matters regarding the planned scope and timing of the audit were discussed with you on March 3, 2022.

- How we proposed to address the significant risks of material misstatement, whether due to fraud or error.
- Our approach to internal control relevant to the audit.
- The concept of materiality in planning and executing the audit, focusing on the factors considered rather than on specific thresholds or amounts.
- The nature and extent of specialized skills or knowledge needed to plan and evaluate the results of the audit, including the use of an auditor's expert.
- Where the System has an internal audit function, the extent to which the auditor will use the work of internal audit, and how the external and internal auditors can best work together.
- Your views and knowledge of matters you consider warrant our attention during the audit, as well as your views on:
 - The allocation of responsibilities between you and management.
 - The System's objectives and strategies, and the related business risks that may result in material misstatements.
 - Significant communications between the System and regulators.
 - Other matters you believe are relevant to the audit of the financial statements and schedules.

SIGNIFICANT ACCOUNTING POLICIES AND MANAGEMENT JUDGMENTS AND ACCOUNTING ESTIMATES

<u>Critical Accounting Policies and Estimates</u>: We are required to discuss with you our judgment about the Plan's critical accounting policies and estimates. Critical accounting policies and estimates are those that are both most important to the portrayal of the Schedule of Proportionate Share of Contributions for Employers and Nonemployer Contributing Entity and total net pension liability as of June 30, 2022, total deferred outflows of resources, and total deferred inflows of resources (specified caption totals) included in the Schedule of Aggregate Pension Amounts for Employers and Nonemployer Contributing Entity and require management's most difficult, subjective or complex judgments, often as a result of the need to make estimates about the effect of matters that are inherently uncertain. We consider the following accounting policies and estimates to be critical, as defined above.

- Schedule of Proportionate Share of Contributions for Employers and Nonemployer Contributing Entity

 Employer contributions are comprised of two components:
 - Current year employer contributions are calculated by CalSTRS based on creditable compensation for active members reported by employers. Employer contributions are accrued monthly based on current contribution rates and estimates based on historical creditable compensation multiplied by an individually calculated accrual factor. Contributions and adjustments to contributions reported in the current year for service performed in a prior year are recognized as contributions in the current year and included in the schedule of proportionate share.
 - An estimate of the current year contributions supplanted by the state's contribution pursuant to SB 90 which represents the amounts employers would have remitted to CalSTRS under CalSTRS Funding Plan (AB 1469) if SB 90 had not been enacted.

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November 2, 2022

Net Pension Liability as of June 30, 2022 - Notes to the Schedule of Aggregate Pension

Amounts for Employers and Nonemployer Contributing Entity provides a summary of the components of the net pension liability of the STRP for participating employers and the State of California (nonemployer contributing entity) in accordance with GASB Statement No. 67, Financial Reporting for Pension Plans - an amendment of GASB Statement No. 25. This information is heavily reliant upon estimates and actuarial assumptions including the investment rate of return, consumer price inflation, wage growth assumption, and mortality assumption, which are used to discount the total pension liability of the STRP. The projection of cash flows used to determine the discount rate assumed that contributions will be made at statutory contribution rates in accordance with Assembly Bill 1469. Projected inflows from investment earnings were calculated using the long-term assumed investment rate of return (7.1 %) and assumed that contributions, benefits payments and administrative expenses occur mid-year. Based on those assumptions, the STRP's fiduciary net position was projected to be available to make all projected future benefit payments to current plan members. Therefore, the long-term assumed investment rate of return was applied to all periods of projected benefit payments to determine the total pension liability. Should the funding levels per Assembly Bill 1469 not be achieved, projected benefit payments would likely be required to be discounted to their actuarial present value using a single (blended) rate that reflects 1) a long-term expected rate of return on pension plan investments to the extent that the pension plan's fiduciary net position is projected to be sufficient to pay benefits and pension plan assets are expected to be invested using a strategy to achieve that return and (2) a tax-exempt, high-quality municipal bond rate (CalSTRS policy is to use The Bond Buyer's 20-Bond GO Index from Bondbuyer.com). Fluctuations in the investment rate of return could have a significant impact upon the calculation of the net pension liability. As described in Note 3, as of June 30, 2021, the most recent actuarial valuation date, the System's independent actuaries determined that the value of STRP's total pension liability rolled forward to June 30, 2022 exceeded the STRP's fiduciary net position by \$69.5 billion.

Significant Accounting Policies: The Audits and Risk Management Committee (ARM Committee) should be informed of the initial selection of and changes in significant accounting policies or their application. Also, the ARM Committee should be aware of methods used to account for significant unusual transactions and the effect of significant accounting policies in controversial or emerging areas where there is a lack of authoritative consensus. We believe management has the primary responsibility to inform the ARM Committee about such matters. To assist the ARM Committee in its oversight role, we also provide the following.

- Revenue recognition policy for preparation of the Plan's Schedule of Proportionate Share of Contributions of Employers and Nonemployer Contributing Entity:
 - Employer contributions to the STRP are calculated based on creditable compensation for active members reported by the employers. Employer and state contributions are accrued when the employer or state has made a formal commitment to provide the contributions. The Plan accrues employer contributions due monthly based on estimates. These estimates are based on historical data embedded within BusinessDirect and could fluctuate significantly at an employer level based on current business conditions and practices. The Plan accrues contributions due from the State of California, a nonemployer contributing entity, at the beginning of each fiscal year based on creditable earnings reported by the employers for the fiscal year ending in the immediately preceding calendar year.
 - The schedule reflects current year employer contributions calculated by the Plan with consideration given to separately financed and irregular employer contributions. Contributions and adjustments to contributions reported in the current year for service performed in a prior year are recognized as contributions in the current year and are included in the schedule.
 - The schedule includes the amount of the employer and nonemployer contributing entity's contributions as defined by this policy for the fiscal year, offset by the prior year accrual for each employer and nonemployer contributing entity.
 - Each employer has been allocated an estimate of the current year contributions supplanted by the state's contribution pursuant to SB 90 which represents the amounts employers would have remitted to CalSTRS under CalSTRS Funding Plan (AB 1469) if SB 90 had not been enacted. The proportionate share by employer and nonemployer contributing entity has been rounded to the nearest one thousandth of a percentage point (three decimal places).

We reviewed the reasonableness of this policy and its impact on the proportionate share of total employer and nonemployer contributing entity contributions per the schedule. Furthermore, we have evaluated the rounding of the proportionate share of employers and nonemployer contributing entity to three decimal places and concluded that the employers and nonemployer contributing entity are responsible for determining their proportionate share of the Plan's net pension liability, which may or may not include reliance upon this schedule. Additionally, the schedule provides both the numerator and denominator for purposes of computing the proportionate share percentage, which would allow the employers and nonemployer contributing entity to compute their proportionate share without consideration for the impact of rounding.

- Total deferred inflows of resources and total deferred outflows of resources per the Schedule of Aggregate Pension Amounts for Employers and Nonemployer Contributing Entity:
 - The schedule includes deferred outflows of resources and deferred inflows of resources that include differences between expected and actual experience, changes in actuarial assumptions and differences between projected and actual earnings on Plan investments.
 - Total deferred inflows of resources reflect the difference between expected and actual experience, amortized over 7 years, which is the closed period equal to the average remaining service life of plan members.

The deferred outflows of resources or inflows of resources reflect differences between expected and actual experience or changes in assumptions, amortized over 7 years, which is the closed period equal to the average remaining service life of plan members and the difference between the projected and actual earnings on Plan investments, amortized over a closed 5-year period, net of amortization expense in the current year, netted. We reviewed the reasonableness of this policy in accordance with the parameters set forth in GASB Statement No. 68, *Accounting and Financial Reporting for Pensions*.

Management Judgments and Accounting Estimates: Further, accounting estimates are an integral part of the schedules prepared by management and are based upon management's current judgments. These judgments are based upon knowledge and experience about past and current events and assumptions about future events. Certain estimates are particularly sensitive because of their significance and because of the possibility that future events affecting them may differ markedly from management's current judgments and may be subject to significant change in the near term.

The following describes the significant accounting estimates reflected in the Plan's schedules, the process used by management in formulating these particularly sensitive accounting estimates and the primary basis for our conclusions regarding the reasonableness of those estimates.

Significant Accounting	Process Used by Management	Basis for Our Conclusions
Total Pension Liability for the STRP	The actuarial pension data contained in the Notes to the Plan's Schedule of Aggregate Pension Amounts for Employers and Nonemployer Contributing Entity is based on actuarial calculations performed in accordance with the parameters set forth in GASB Statement No. 67, Financial Reporting for Pension Plans – an amendment of GASB Statement No. 25 ("GASB 67"). Amounts reported for total pension liability require management to use estimates that may be subject to significant changes in the near term. These estimates are based on investment rate of return, consumer price inflation, wage growth, post-retirement benefit increases and	We evaluated the reasonableness of these estimates and actuarial assumptions.

AUDITOR'S JUDGMENTS ABOUT QUALITATIVE ASPECTS OF SIGNIFICANT ACCOUNTING PRACTICES

We are to discuss with you our comments about the following matters related to the Plan's accounting policies and schedule disclosures. Accordingly, these matters will be discussed during our meeting with you.

- The appropriateness of the accounting policies to the particular circumstances of the Plan, considering the need to balance the cost of providing information with the likely benefit to users of the Plan's schedules.
- The overall neutrality, consistency, and clarity of the disclosures in the schedules.
- The effect of the timing of transactions in relation to the period in which they are recorded.
- The potential effect on the schedules of significant risks and exposures, and uncertainties that are disclosed in the schedules.
- The extent to which the schedules are affected by unusual transactions including nonrecurring amounts recognized during the period, and the extent to which such transactions are separately disclosed in the schedules.
- The issues involved, and related judgments made, in formulating particularly sensitive schedule disclosures.
- The factors affecting asset and liability carrying values.
- The selective correction of misstatements.

CORRECTED AND UNCORRECTED MISSTATEMENTS

<u>Corrected Misstatements</u>: We are to inform you of material corrected misstatements that were brought to the attention of management as a result of our audit procedures. There were no such misstatements.

<u>Uncorrected Misstatements</u>: We are to inform you of uncorrected misstatements that were aggregated by us during the current engagement and pertaining to the latest and prior period(s) presented that were determined by management to be immaterial, both individually and in the aggregate, to the schedules taken as a whole. For your consideration, we have distinguished misstatements between known misstatements and likely misstatements. There were no such misstatements.

OTHER COMMUNICATIONS

Communication Item	Results
Other Information Included in an Annual Report Information may be prepared by management that accompanies or includes the schedules. To assist your consideration of this information, you should know that we are required by audit standards to read such information and consider whether a material inconsistency exists between the other information and the schedules. We are also to remain alert for indications that: Material inconsistency exists between the other information and the auditor's knowledge obtained in the audit; or A material misstatement of fact exists, or the other information is otherwise misleading. If we identify a material inconsistency between the other information and schedules, we are to seek a	We read CalSTRS' Other pension information and noted no material inconsistencies or misstatement of facts in such information based on our reading thereof.
resolution of the matter.	

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Communication Item	Results
Significant Difficulties Encountered During the Audit We are to inform you of any significant difficulties encountered in dealing with management related to the performance of the audit.	There were no significant difficulties encountered in dealing with management related to the performance of the audit.
Disagreements with Management We are to discuss with you any disagreements with management, whether or not satisfactorily resolved, about matters that individually or in the aggregate could be significant to the Plan's schedules or the auditor's report.	During our audit, there were no such disagreements with management.
Difficulties or Contentious Matters We are required to discuss with the Those Charged with Governance any difficulties or contentious matters for which we consulted outside of the engagement team.	During the audit, there were no such issues for which we consulted outside the engagement team.
Circumstances that Affect the Form and Content of the Auditor's Report	The following circumstances affect the form and content of the auditor's report:
We are to discuss with you any circumstances that affect the form and content of the auditor's report, if any.	We consider it necessary to include an other- matter paragraph in accordance with section 706, Emphasis-of-Matter Paragraphs and Other-Matter Paragraphs in the Independent Auditor's Report, of SAS 134 or are required to do so by other AU-C sections.
Consultations with Other Accountants If management consulted with other accountants about auditing and accounting matters, we are to inform you of such consultation, if we are aware of it, and provide our views on the significant matters that were the subject of such consultation.	We are not aware of any instances where management consulted with other accountants about auditing or accounting matters since no other accountants contacted us, which they are required to do by Statement on Auditing Standards No. 50, before they provide written or oral advice.
Representations the Auditor Is Requesting from Management We are to provide you with a copy of management's requested written representations to us.	We direct your attention to a copy of the letter of management's representation to us provided separately.
Significant Issues Discussed, or Subject to Correspondence, With Management We are to communicate to you any significant issues that were discussed or were the subject of correspondence with management.	 Our report on internal control over financial reporting and on compliance and other matters based on an audit of schedules performed in accordance with Government Auditing Standards; We have previously communicated to management the internal control deficiencies that we identified during our audits; Our engagement letter (previously discussed with and approved by you); and Our SAS 114 letter discussing the CalSTRS financial statement audit

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Communication Item	Results
Significant Related Party Findings or Issues We are to communicate to you significant findings or issues arising during the audit in connection with the Plan's related parties.	There were no such findings or issues that are, in our judgment, significant and relevant to you regarding your oversight of the financial reporting process.
Other Findings or Issues We Find Relevant or Significant We are to communicate to you other findings or issues, if any, arising during the audit that are, in our professional judgment, significant and relevant to you regarding your oversight of the financial reporting process.	There were no such other findings or issues that are, in our judgment, significant and relevant to you regarding your oversight of the financial reporting process.

We are pleased to serve your System and the Plan as its independent auditors and look forward to our continued relationship. We provide the above information to assist you in performing your oversight responsibilities and would be pleased to discuss this letter or any matters further, should you desire. This letter is intended solely for the information and use of the ARM Committee and, if appropriate, management, and is not intended to be and should not be used by anyone other than these specified parties.

Crowe LLP

Casus LLP

Sacramento, California October 6, 2022