



BOARD OF SUPERVISORS  
**COUNTY OF HUMBOLDT**

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August 9, 2022

Andrew White, Regulation Coordinator  
California Public Employees' Retirement System  
PO Box 942720  
Sacramento, CA. 94229-2720

RE: Pending Regulations Defining "Limited Duration Employment"

Dear Mr. White:

The California Public Employees' Retirement System (CalPERS) Board of Administration' has proposed regulatory action that would define "limited duration employment". On behalf of the Humboldt County Board of Supervisors, we have concerns with this proposal.

"Limited duration" would limit the appointment of a retired person to 24 consecutive months in the employ of a CalPERS-participation employer. The 24-month limit could be extended for up to two additional 12-month periods if certain requirements are met and with the approval of CalPERS. This would make filling positions exceedingly more difficult and costly. Humboldt County is one of the employers who has utilized retired annuitants in various departments serving in a variety of positions.

In many counties there is significant difficulty in recruiting and retaining staff. Substantial vacancy rates and rising employment costs make it particularly challenging to fill necessary positions. Further, given the vital tasks and public trust associated with local government jobs, having qualified applicants is more important than ever. Many counties are experiencing considerable numbers of resignations and retirements, due to the social and economic situation in the state, which brings the recruitment challenges more clearly into focus. Add in the fact rural counties, such as Humboldt, do not have a large employee pool to start with. Therefore, significant limitations on the ability to utilize retired annuitants is detrimental to Humboldt County.

Retaining retired annuitants serves many benefits. Chief among them is the ability to have access to experienced staff, who have a high level of competency in the position they serve. Often the retired annuitant serves as the training guide for new employees until the employee has reached the level of competence needed for the job. And lastly, retired annuitants understand the complexity of overall county structure which better serves not only the employer, but the community in general. An example is annuitant employment at Humboldt County's only regional airport, e California Redwood Coast Humboldt County Airport. TSA and safety goals are only being met by hiring experienced law enforcement annuitants. Without their willingness to fill these vital positions, safety and federal requirements cannot be met.

Flexibility in hiring and filling critical positions in every county department is crucial. We urge you to reconsider this regulation and allow for agencies to determine the duration of annuitant employment.

Sincerely,

Virginia Bass, Chair  
County of Humboldt