

oppaga

Special Review



February 2001

Report No. 01-12

Feasibility of Outsourcing Florida's Statewide Retirement Systems

at a glance

The Division of Retirement of the Department of Management Services serves 800,000 statewide retirement system members and oversees almost 500 local government retirement systems.

The feasibility of outsourcing depends upon generating competition among a sufficient number of bidders willing to provide the same or better services at lower cost combined with strong contract monitoring by the state.

The outlook for competition is good. Although none of the public retirement systems we examined have been outsourced, private companies are available that administer large private sector pension plans. In response to our inquiries, representatives of 12 companies indicated that their companies could provide most of the division's services. However, many of these companies do not wish to assume responsibility for oversight of local government retirement systems and handling benefit appeals; outsourcing these two functions may not be feasible or appropriate.

If the Legislature decides to outsource the Division of Retirement, the Department of Management Services should follow these steps:

- identify the services to be outsourced;
- identify state costs for these services;

- identify desired performance levels for the services;
- issue a request for information (RFI);
- review the RFI responses;
- issue a request for proposal (RFP) using a managed competition approach;
- assess the RFP responses;
- establish a strong contract oversight mechanism; and
- contract with a vendor or vendors.

The potential cost-effectiveness of outsourcing Division of Retirement Services can be determined only when vendors submit price bids that can be compared to current Division of Retirement costs.

Purpose

In January 2001, the Office of the Speaker of the House of Representatives requested that OPPAGA examine the feasibility of outsourcing the services provided by the Department of Management Services' Division of Retirement. We were asked to determine how private sector firms could provide these services. We conducted our review by analyzing the Division of Retirement's services and those offered by private sector providers. We considered the

Department of Management Services' perspectives. We also examined how other states and private sector firms provide retirement services to their employees.

Background

The Division of Retirement serves 800,000 statewide retirement system members and oversees almost 500 local government retirement systems

The Division of Retirement has two major responsibilities: (1) administering statewide retirement systems, and (2) overseeing local government retirement systems.

The division provides a wide array of services to administer statewide retirement systems

The division administers all statewide retirement systems, the largest of which is the Florida Retirement System (FRS). Administering the FRS is the division's primary responsibility. As of June 2000, the FRS was providing retirement services to 595,368 active employee members and 181,238 retirees. There are 801 government agencies participating in the FRS, including all state agencies, counties, and school boards, and many cities and special districts. FRS members are predominantly local government employees (75%).

The Florida Retirement System is the fourth largest state retirement system in the United States. Only the California Public Employees' Retirement System, the New York State and Local Retirement Systems, and the California State Teachers' Retirement System exceed the FRS in size.¹

The Florida Retirement System is a defined benefit plan. In a defined benefit plan, the employer guarantees a certain level of retirement benefits based on years of service.

Retirees' benefits are based on formulas that take into account years of service, salary levels, and age at retirement.

The FRS includes five membership classes, generally based on the type of employment and job risk (see Appendix A). As of July 1, 2001, all membership classes will provide vesting of benefits after six years of creditable service.² The five membership classes have varying retirement ages and other benefit provisions. Normal retirement age for each class is shown in Appendix A.

The division's major administrative responsibilities for the Florida Retirement System are listed in Exhibit 1.

The division is also responsible for administering Social Security coverage for Florida's public employers and administering 13 smaller statewide retirement systems, several of which are closed to new members. The smaller statewide retirement systems administered by the Division of Retirement are shown in Appendix B.

The 2000 Legislature created a defined contribution plan option (Public Employees' Optional Retirement Program) for employees eligible for FRS membership.³ The new defined contribution plan is to be implemented on July 1, 2002. A division manager told us that the division's involvement in implementation of the plan is as yet unknown. By law, a third-party administrator rather than the division is to administer the plan.

¹ This comparison is based on total asset value. FRS is also the fourth largest state retirement system based on total membership. California Public Employees' Retirement System, the Teachers' Retirement System of Texas, and the New York State and Local Retirement Systems all exceed FRS in total membership.

² Previously, the vesting provisions for the FRS membership classes varied.

³ In a defined contribution plan, retirees' benefits are based on the amount of investment earnings for contributions made on their behalf.

Exhibit 1
The Division of Retirement’s Major Administrative Responsibilities for the Florida Retirement System

Enrollment functions
<ul style="list-style-type: none"> ▪ Determining eligibility for retirement system membership ▪ Determining eligibility for disability and survivor benefits ▪ Enrolling new members ▪ Enrolling local government employers who wish to join the system ▪ Maintaining retirement records, such as members’ service credits ▪ Enrolling members into the Deferred Retirement Option Program (DROP)
Benefit determination functions
<ul style="list-style-type: none"> ▪ Calculating estimates and final benefits due to each member ▪ Monitoring reemployment after retirement
Accounting and payroll functions
<ul style="list-style-type: none"> ▪ Collecting employer contributions and transferring these monies to the State Board of Administration for investment ▪ Determining benefit payments to retirees and persons receiving disability or survivor benefits, including additions and changes, and transmitting these data to the State Comptroller’s Office which distributes payments to beneficiaries ▪ Distributing insurance deductions from benefit payments to various insurance companies ▪ Conducting audits of employers’ payroll records ▪ Compiling and distributing retirees’ annual tax information ▪ Performing accounting activities for the Florida Retirement System Trust Fund
Customer service functions
<ul style="list-style-type: none"> ▪ Counseling members on their retirement rights and benefits, which may include one-on-one meetings, and answering telephone inquiries, written correspondence, and e-mail inquiries ▪ Educating members and employers, which includes maintaining online information, holding seminars, and distributing newsletters and annual member statements
Other administrative functions
<ul style="list-style-type: none"> ▪ Administering the Retiree Health Insurance Subsidy program ▪ Resolving benefit appeals through an informal and formal hearing process, which includes providing support to the State Retirement Commission

Source: OPPAGA analysis of Division of Retirement documents.

The division oversees local government retirement systems

The division is also responsible for overseeing 483 Florida local government retirement systems that are not part of the FRS. Program activities include monitoring the actuarial soundness of local retirement systems,

reviewing the actuarial impact of any proposed changes to these systems, and approving the distribution of insurance premium tax revenues to qualified municipal police officer and firefighter pension plans. In order to receive the insurance premium taxes, the police officer and firefighter plans must be annually approved by the Division of Retirement as having met statutory requirements, such as providing a minimum level of benefits and meeting actuarial funding requirements.

Division Budget and Staffing

The Division of Retirement was appropriated spending authority of \$21,849,557 and 246 FTEs for its operations in Fiscal Year 2000-01. Of this amount, \$21,133,449 and 205 FTEs were allocated to administering statewide retirement systems and \$716,108 and 9 FTEs were allocated to overseeing local government retirement systems.⁴ The division was also appropriated \$2,741,070,403 to pay retirement benefits.

The division has already outsourced its information technology function and uses consultants for actuarial valuations and other studies

In January 2001, the division outsourced its information technology function to a private contractor. This outsourcing resulted in a cost shift to contractual services and a staffing reduction of 31 FTEs.

Division managers use consultants as needed. For example, they contract for actuarial valuations of the Florida Retirement System. Consultants also recently evaluated the disability determination function and conducted a study of the division’s functions to assist division managers in making decisions about how to best organize and operate the division in the future.

⁴The division initially allocated 236 positions to administer statewide retirement systems and 10 positions to oversee local government retirement systems. The 236 positions were later reduced by 31 positions due to outsourcing the division’s Bureau of Retirement Systems Development. Also, division managers reported that one of the 10 positions initially allocated to oversee local retirement systems is being deleted in order to contract for actuarial services.

Division managers also have used private consultants in other areas to improve the division's operations and assess customer satisfaction with services. For example, in 1994, the division undertook a reengineering effort to automate business processes and information systems, known as the Re-engineering, Improvement and Modernization Project (RIM). To accomplish this effort, the division contracted with a consultant to do a re-engineering master plan, identify future functional and technical needs, and design a new information system.

Feasibility of Outsourcing Division of Retirement —

The private sector has the capacity to provide most division services

The feasibility of outsourcing depends upon generating competition among a sufficient number of bidders willing to provide the same or better services at lower cost combined with strong contract monitoring by the state.

The outlook for competition is good. We made inquiries to private companies and other large government retirement systems to determine whether providers were ready to administer the Florida Retirement System and perform the division's other duties. We obtained information from 14 private companies that provide administrative services for defined benefit retirement plans.⁵ We also contacted representatives of government agencies in nine other states and one federal government agency that administer defined benefit pension plans to determine the extent to which they outsource their services.⁶

⁵ In making these inquiries, we informed these companies that we were making informal inquiries for a legislative study rather than conducting a more formal request for information.

⁶ We talked to state retirement plan administrators from California (two plans), Colorado, Georgia, Michigan, New Jersey, New York, Ohio, Texas (two plans), and Wisconsin, and an administrator with the U.S. Office of Personnel Management, Federal Retirement Programs.

We concluded that contracting for administration of a large government defined benefit retirement system is not a standard practice. None of the government retirement systems we contacted had outsourced the administration of their defined benefit plans. They reported use of contractors for specific services such as financial planning seminars or information technology.

Nonetheless, there are private companies in the marketplace that have assumed the administration of large private sector pension plans. In response to our inquiries, representatives of 12 companies voluntarily gave us nonbinding responses indicating that their companies have the capabilities to administer most or all of the duties currently administered by the Division of Retirement.⁷ These companies are Buck Consultants, William C. Earhart, Co., Fidelity Investments, First Union, Fringe Benefit Management Company, Hewitt Associates, New York Life Insurance Company, Professional Benefits Retiree Services, Northern Trust, Zenith Administrators, PricewaterhouseCoopers, and Automatic Data Processing, Inc./ William M. Mercer (which provided a joint response).⁸

Two division services might be difficult to outsource

Based on the responses from private companies, we concluded that two of the division's responsibilities might be difficult and/or inappropriate to outsource. Some company representatives said that their companies might not be able to assume the oversight of local

⁷ In a prior review of the Division of Retirement, private companies we contacted indicated that they were uncertain of their capabilities to administer the division's responsibilities due to the size and complexity of the Florida Retirement System. See *Program Evaluation and Justification Review: Retirement Program Administered by the Division of Retirement*, [OPPAGA Report No. 97-75](#), June 1998.

⁸ These companies range from small third-party administrators to large multinational firms. The sizes of the pension plans they administer also vary. For example, one firm administers a private sector plan with 700,000 members, another administers a plan with 100,000 members, and another administers small plans with 1,000 to 6,000 members. The smaller firms may need to partner with others in order to meet the demands of Florida's statewide retirement systems.

retirement systems and resolution of benefit appeals. These duties are atypical of the administrative duties needed for private sector retirement plans.

Privatizing oversight of local retirement systems might be problematic as it could create substantial liability issues for companies should they erroneously determine that a local government retirement system was actuarially sound. Also, some company representatives indicated that their companies provide actuarial services to the local government systems and thus would have a conflict of interest if they also assumed oversight of these systems.

The resolution of benefit appeals might be problematic to outsource because this function involves providing due process appeal rights to members of the retirement plan. The Legislature may not want to give this responsibility to the private sector.⁹

Moving Toward Outsourcing

If the Legislature decides to outsource some or all of the services presently provided by the Division of Retirement, the Department of Management Services should take the following steps:

1. identify the services to be outsourced;
2. identify state costs for these services;
3. identify desired performance levels for the services;
4. issue a request for information (RFI);
5. review the RFI responses;
6. issue a request for proposal (RFP);
7. assess the RFP responses;
8. establish a strong contract oversight mechanism; and
9. contract with a single or multiple vendors.

⁹ According to division managers, the division allocates seven division FTEs to the resolution of benefit appeals, including providing support to the State Retirement Commission.

Step 1: Identify services to be outsourced

The Department of Management Services (DMS) should first identify the Division of Retirement services to be outsourced in consultation with the Legislature. The division's major responsibilities for statewide retirement systems can be grouped into the following administrative responsibilities: enrollment functions, benefit determination functions, accounting and payroll functions, customer service functions, and other administrative functions. The division is also responsible for overseeing 483 Florida local government retirement systems that are not part of the FRS.

Our preliminary assessment is that the core services provided by the Division of Retirement have the potential to be outsourced to one or more private companies. Services that should remain with DMS because they could be problematic to outsource would include the oversight of local government retirement systems and the resolution of benefit appeals.

This step also should include the determination of how to handle the division's current data systems. The department has recently outsourced the administration of the division's information technology to a private vendor, but retained ownership of the data system.

The state has invested \$38 million into re-engineering the division's information technology and processes. The resulting system is designed to support the unique needs of Florida's statewide retirement systems. It might be expensive for a vendor to replicate the division's data systems, which would add to the prices vendors would charge the state for services.

Options to consider would be (1) continue with the current arrangement and require a new private sector administrator to coordinate with the information technology vendor, (2) sell or lease the existing system to a new administrator, or (3) abandon the current system and use the data systems of the new administrator.

Step 2: Identify state costs for services

The department should determine the state's current costs for each service that may be outsourced. This information will be needed to evaluate bid responses and make decisions on whether to proceed with outsourcing.

In evaluating the state's costs, the department should also develop estimates of the state's costs for monitoring contractors should division services be outsourced. The department should also assess whether any other indirect state costs would be incurred if these services were contracted out. Indirect state costs and monitoring costs should be added to the bids of private vendors when comparing the cost of outsourced services to the cost of state-run services.

Step 3: Identify desired performance levels for services

The Department of Management Services should evaluate the Division of Retirement's existing performance measures to determine whether the measures can provide a meaningful evaluation of contractor performance. If the existing measures are inadequate, the department should establish additional measures and performance standards. This information should be incorporated into the bidding process and the department's contracting with a vendor or vendors. For example, measures will be needed to assess the quality of the services being outsourced, such as timeliness and accuracy rates.

Step 4: Issue a Request for Information

To assess the availability and to generate interest among private companies to assume some or all of the division's services, DMS should issue a Request for Information (RFI). The purpose of the RFI is to identify whether there are private sector firms which could provide the division's services, which services they would be able to provide, what information needs to be included in a Request for Proposal, and what assistance the state would need to provide to ensure a smooth

transition. Further analysis of vendors is needed as our analysis was based on nonbinding responses.

DMS should develop and issue the RFI within 90 days, and should then require responses to the RFI within 60 days.

The RFI should include, but not be limited to, the elements listed below.

- **A list and description of the specific services within the division that are available for bidding.** Again, except for benefit appeals and oversight of local systems, our assessment is that the services can be outsourced. The RFI should clearly describe the processes involved in the provision of each service. For example, when describing the customer service functions, the RFI should describe the ways in which division staff presently serve active members and retirees, such as via telephone, e-mail, one-on-one meetings, and annual mail-outs.
- **Identification of the number of transactions involved in the provision of each service.** For example, the RFI should identify the number of checks distributed to retirees each month and the number of new members enrolled each year. This will help ensure that private companies who respond will have a realistic understanding of the scope of services expected.
- **A discussion of future trends that might occur in the provision of each service.** For example, other states are presently implementing technology that will allow individual members access to their retirement account information on-line. Florida's expectation for the provision of services should be that vendors would provide members on-line access to account information via web-based technology.
- **Specification as to whether vendors would be expected to integrate their systems with the existing division data systems, take over the administration of the state's data systems, or administer the state's**

retirement systems using the vendor's data system.

Respondents to the request for information should be required to provide, at a minimum, the information listed below.

- **A description of the specific services they could provide, specifying whether they could provide some or all of the services.** This will give the department information on the ability and availability of private companies to provide retirement services.
- **An indication of the information that needs to be included in a Request for Proposal so that vendors can make cost estimates.** This would assist DMS in developing a better Request for Proposal. For example, vendors may need more detailed information about the services or additional information on the number of transactions.
- **A description of any assistance the state would need to provide to ensure a smooth transition from state-run services to outsourced services.**

During the RFI process, the department should schedule a Pre-Proposal Conference where potential bidders could ask questions and discuss issues concerning information in the RFI. The results of this conference may prove valuable in developing a more effective Request for Proposal.

Step 5: Review RFI responses

Once DMS receives the RFI responses, DMS staff should review and assess the RFIs to determine private sector capacity, potential state costs, and how to best word the Request for Proposal.

First, DMS staff should review the RFI responses to identify private companies that can provide the division's services. In our preliminary assessment, we identified major financial investment companies, banks, and third-party administrators as potential private sector companies that could provide these services.

Second, DMS should use the information obtained from the RFI responses to refine estimates of the department's costs for monitoring future contracts and any other state costs. For example, responses to the RFIs may identify more companies which can provide a specific service rather than companies which can provide all the services. Thus, DMS might need to estimate monitoring costs for multiple vendors.

Finally, DMS should use the RFI responses to ensure that the Request for Proposal (the next step) is clear and specific. For example, companies may respond to the RFI that they can handle member inquiries via a centralized call center, but not mention the other means through which employees may currently make inquiries (such as in-person, written, or on-line inquiries). Thus, DMS may need to specify in a Request for Proposal that a vendor is required to respond to member inquiries in specific ways (which would screen out companies unable to meet all requirements to provide one service). Alternatively, DMS may decide to limit member inquiries to certain modes in the interest of cost-effectiveness.

Step 6: Issue a Request for Proposal

The next step is to develop a formal request for proposal (RFP). The RFP should allow vendors to bid on providing all or just some of the division's services. DMS should develop and issue the RFP within 90 days, and should then require responses to the RFP within 60 days.

The department should use a managed competition approach for the RFP in which the division is also required to bid on retaining its services. The division's bid should be evaluated in the same manner as that of other vendors. The division's proposal would allow the department to better compare public and private sector costs for these services.

The RFP should include, but not be limited to, the elements listed below.

- **A list and description of the specific services within the division that are up for bidding.**

- **Detailed information on the volume and seasonality of transactions involved in the provision of each service.**
- **The type and quantity of additional services the department wishes to implement, such as a web-based retirement information system.**
- **The performance measures upon which the eventual contractor will be evaluated.** The department should set performance level expectations for each service. The RFP should specify that the department plans to establish a performance-based contract with the winning bidder.
- **Specification as to whether vendors would be expected to integrate with the existing division data systems, take over the administration of the state's data systems, or administer the state's retirement systems using the vendor's data system.** If vendors would be expected to integrate with or take over the existing division data system, the RFP should provide detail on the capabilities of the division's data system. For example, vendors will need to know what data elements are currently collected by the division's system.
- **A procurement timetable that sets forth dates for submission of vendor proposals and approval of bids.**
- **The criteria the department will use to evaluate vendors, such as cost, capacity, and experience.**
- **A declaration that the department may unbundle proposals or select multiple vendors if no single vendor can demonstrate capacity to perform all services.**

Respondents to the request for proposal should be required to provide, at a minimum, the information listed below.

- **A demonstration of the vendor's financial soundness, such as audited financial statements for the last five years.**
- **A description of the vendor's prior experience, with emphasis on the vendor's**

experience in government and private sector benefits administration.

- **A description of the specific services the vendor is proposing to administer.** Also, the vendor needs to specify which services it plans to sub-contract, if applicable.
- **Detailed information on the prices the vendor will charge for services, including any start-up costs.** The department should require a uniform pricing format, such as cost per active member, to aid in comparing bids.
- **Information on the number of full-time equivalent employees who will be devoted to administering Florida's retirement systems.**
- **Any plans for hiring current division employees.**
- **An estimate of the time needed for transition and start-up.**

Step 7: Assess RFP responses

DMS staff should assess the vendors' and the division's bids based on the RFP criteria, such as cost, capacity, and experience of the bidder. Using the cost data developed prior to and during the RFI process, the department should strive to evaluate the full costs of each proposal, including any state monitoring costs or other indirect state costs for each bidder.

After analyzing the bids, department managers should determine whether to outsource one or more of the division's services. Department managers also should decide whether to outsource to one or more than one provider. For example, a vendor may be able to cost-effectively provide one specific service, such as customer service, compared to the other vendors. If this is the case, department managers should evaluate whether this service can be separated from the administration of other services without diminishing the quality of service and accountability.

Step 8: Establish a strong contract oversight mechanism

Whether DMS selects the Division of Retirement or one or more private vendors, it is crucial to establish a strong oversight mechanism as part of the contracting process. This will help ensure that active members, retirees, and participating agencies receive quality services in a cost-effective manner.

Department managers should develop a performance-based contract that stipulates how they will review the vendor's performance. First, the contract should specify how performance will be reported and establish a mechanism for accountability. For example, DMS should be allowed sufficient access to records to enable a verification of performance reported by the vendor. Second, the contract should clearly state the timeframes for monitoring, such as a quarterly assessment of performance. Third, the contract should list the performance measures and standards upon which the quality of services will be evaluated.

A final aspect of a strong oversight mechanism is to stipulate penalties in the contract for failure to meet performance expectations. The contract should include levels of sanctions for poor performance. For instance, the department may initially deal with vendor performance problems by requiring the vendor to submit an improvement plan to address deficiencies. However, the contract should stipulate that payment will be withheld if the vendor continues to fall short of expectations. The contract should also include provisions for contract cancellation if the vendor continues to fail to meet performance standards.

Step 9: Contract with a vendor(s)

Once department managers have selected a vendor(s), the final stage of the process involves issuing the performance-based contract. If DMS selects a private vendor(s) instead of the Division of Retirement, then department managers must also establish the timeframe for how and when the transition of data systems and services will occur. Priority should be placed on a transition plan that causes the least amount of disruption to the active members, retirees, and employers of the retirement system.

Appendix A

Florida Retirement System Membership Classes

Membership Class	Description of Membership	Normal Retirement Age
Regular Class	Members of the FRS who do not qualify for membership in any other class	6 years of service and age 62 30 years of service, regardless of age
Special Risk Class	Members who are employed as law enforcement officers, firefighters, or correctional officers, and meet certain criteria	6 years of Special Risk service and age 55 25 total years special risk service, regardless of age
Special Risk Administrative Support Class	Members who were in the special risk classification and were transferred or reassigned to non-special risk law enforcement, firefighting, or correctional administrative support positions within an FRS special risk employing agency	Special risk requirements apply to service in this class if a member has 10 years actual special risk service; otherwise, regular member requirements apply.
Elected Officers' Class	Members who are elected state and county officers	6 years Elected Officers' Class service and age 62 30 years of any credible service, regardless of age
Senior Management Service Class	Members in senior management level positions in state and local government, including certain selected managerial staff in various positions	6 years Senior Management service and age 62 10 years of any credible service and age 62 30 years of any credible service, regardless of age

Source: *Florida Statutes*.

Appendix B

Other Statewide Retirement Systems Administered by the Division of Retirement

Other Statewide Retirement Systems Administered by the Division of Retirement	Number of Active Members as of June 30, 1999 ¹	Number of Retirees as of June 30, 1999 ¹
State University System Optional Retirement Program	10,185	
Senior Management Service Optional Annuity Program	93	
Teachers' Retirement System	1,026	6,744
Teachers' Retirement System – Survivor's Benefits		965
State and County Officers and Employees' Retirement System	40	2,449
Highway Patrol Pension Fund		88
Judicial Retirement System		21
Institute of Food and Agricultural Sciences Supplemental Retirement Program	146	69
General Revenue Funded Pensions		
Noncontributory (s. 112.05, <i>Florida Statutes</i>)		149
Florida National Guard		523
Judicial Retirement		7
Teachers (s. 238.171, <i>Florida Statutes</i>)		7
Special Pensions		2
Totals	11,490	11,024

¹ More current data are not yet available.

Source: *Florida Retirement System Annual Report, July 1, 1998 – June 30, 1999*.

Appendix C Agency Response



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DEPARTMENT OF MANAGEMENT
SERVICES

**DIVISION OF RETIREMENT
Office of the Director**

Cedars Executive Center
2639 North Monroe Street, Building C
Tallahassee, FL 32399-1560
Telephone: 850-488-5540
Fax: 850-921-0371

JEB BUSH, GOVERNOR

CYNTHIA A. HENDERSON, SECRETARY

February 27, 2000

John Turcotte, Director
The Florida Legislature
Office of Program Policy Analysis
and Government Accountability
111 W. Madison Street, Suite 312
Tallahassee, FL 32399-1475

Dear Mr. Turcotte:

We have received your Special Review of February 2001 entitled, "Feasibility of Outsourcing Florida's Statewide Retirement Systems." We appreciate the time you spent in your analysis of the issues involved in a total and sectional outsourcing of division responsibilities. We agree that while there are a number of willing potential respondents in a competitive bid process, there is more work needed to be done to understand all service levels of our administration, as well as a thorough analysis to effectively cost out these services for comparative purposes. We are very proud of our division-wide cost of \$21.05 per member, excluding RIM costs, as of FY 1999-2000. We further feel that the level of service that we can provide based on our intricate knowledge of the complexities of the Florida Statutes governing the state retirement system, would be difficult to replicate, especially at our current cost structure.

We look forward to working with the Legislature as they proceed in coming to conclusion in this most important matter.

Sincerely,

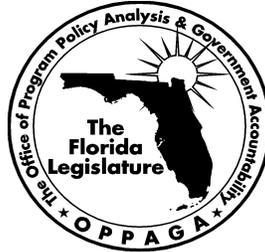
Erin B. Sjostrom
Director of Retirement

EBS:cc

cc: Ms. Cynthia A. Henderson
Mr. Jim Varnado

The Florida Legislature

Office of Program Policy Analysis and Government Accountability



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Project supervised by Becky Vickers (850/487-1316)

Project conducted by Marti Harkness (850/487-9233) and Bernadette Howard (850/487-9219)

John W. Turcotte, OPPAGA Director