

Burgos, Alexander N

Subject: FW: [External] 20 NCAC 02M Additional Responses to Additional Requests for Changes;
Rule Text Revisions

From: Duke, Lawrence <lawrence.duke@oah.nc.gov>

Sent: Monday, February 13, 2023 4:05 PM

To: Rowe, Laura <laura.rowe@nctreasurer.com>

Cc: Melton, Timothy M <Timothy.Melton@nctreasurer.com>; Burgos, Alexander N <alexander.burgos@oah.nc.gov>

Subject: RE: [External] 20 NCAC 02M Additional Responses to Additional Requests for Changes; Rule Text Revisions

Laura,

Thank you for making these changes. Please resubmit the full set of the corrected rules, including any forms that have been changed, to oah.rules@oah.nc.gov. I will be recommending approval.

Lawrence Duke

Counsel, NC Rules Review Commission

Office of Administrative Hearings

(984) 236-1938

Burgos, Alexander N

Subject: FW: [External] 20 NCAC 02M Additional Responses to Additional Requests for Changes; Rule Text Revisions
Attachments: 2. 02M Additional Responses to Additional Requests for Changes (2.9.2023).docx; 20 NCAC 02M .0301 (2.9.2023).docx; 20 NCAC 02M .0303 (2.9.2023).docx

From: Laura Rowe <Laura.Rowe@nctreasurer.com>
Sent: Thursday, February 9, 2023 10:22 AM
To: Duke, Lawrence <lawrence.duke@oah.nc.gov>
Cc: Melton, Timothy M <Timothy.Melton@nctreasurer.com>; Burgos, Alexander N <alexander.burgos@oah.nc.gov>
Subject: [External] 20 NCAC 02M Additional Responses to Additional Requests for Changes; Rule Text Revisions

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Good Morning Lawrence,
Attached are additional written responses to additional questions and requests for changes to 02M. Also attached are the additional rule revisions in response to the additional requests for changes.

Thank you for your review. We hope we've addressed your concerns and we look forward to discussing any remaining questions ahead of the February meeting, if needed.

Laura

Laura Rowe
Compliance Officer
Office of the State Treasurer
Office: (919) 814-3851

3200 Atlantic Avenue, Raleigh, NC 27604

www.NCTreasurer.com



NORTH CAROLINA
DEPARTMENT OF STATE TREASURER



Dale R. Folwell, CPA
STATE TREASURER OF NORTH CAROLINA
DALE R. FOLWELL, CPA

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**Request for Changes Pursuant to
N.C. Gen. Stat. § 150B-21.10**

Staff reviewed these Rules to ensure that each Rule is within the agency's statutory authority, reasonably necessary, clear and unambiguous, and adopted in accordance with Part 2 of the North Carolina Administrative Procedure Act. Following review, staff has issued this document that may request changes pursuant to G.S. 150B-21.10 from your agency or ask clarifying questions.

The imposition of a question implies that the rule as written is unclear or there is some ambiguity. If the request includes questions and you do not understand the question, please contact the reviewing attorney to discuss. Failure to respond may result in a staff opinion recommending objection.

Staff may suggest the agency "consider" an idea or language in this document. This is in no way a formal request that the agency adopt the idea or language but rather is offered merely for consideration which the agency may find preferable and clarifying.

In order to properly submit rewritten rules, please refer to the following Rules in the NC Administrative Code:

- Rule 26 NCAC 02C .0108 – The Rule addresses general formatting.
- Rule 26 NCAC 02C .0404 – The Rule addresses changing the introductory statement.
- Rule 26 NCAC 02C .0405 – The Rule addresses properly formatting changes made after publication in the NC Register.

Note the following general instructions:

1. You must submit the revised rule via email to oah.rules@oah.nc.gov. The electronic copy must be saved as the official rule name (XX NCAC XXXX).
2. For rules longer than one page, insert a page number.
3. Use line numbers; if the rule spans more than one page, have the line numbers reset at one for each page.
4. Do not use track changes. Make all changes using manual strikethroughs, underlines and highlighting.
5. You cannot change just one part of a word. For example:
 - Wrong: "~~a~~Association"
 - Right: "~~association~~ Association"
6. Treat punctuation as part of a word. For example:
 - Wrong: "day, ~~and~~"
 - Right: "~~day,~~ day, and"
7. Formatting instructions and examples may be found at:
www.ncoah.com/rules/examples.html

If you have any questions regarding proper formatting of edits after reviewing the rules and examples, please contact the reviewing attorney.

REQUEST FOR § 150B-21.10 CHANGES

AGENCY: Teachers' and State Employees' Retirement System Board of Trustees AND
Local Governmental Employees' Retirement System Board of Trustees

RULE CITATION: 20 NCAC 02M .0202

DEADLINE FOR RECEIPT: Monday, December 12, 2022

PLEASE NOTE: This request may extend to several pages. Please be sure you have reached the end of the document.

The Rules Review Commission staff has completed its review of this Rule prior to the Commission's next meeting. The Commission has not yet reviewed this Rule and therefore there has not been a determination as to whether the Rule will be approved. You may email the reviewing attorney to inquire concerning the staff recommendation.

In reviewing this Rule, the staff recommends the following changes be made:

In items (1) and (2), what is "when first eligible" referencing? This should be included in the Rule. It is referencing the phrase "when first eligible" that appears in the authorizing statutes in the History Note. For example, in G.S. 135-5(l), "... provided the retired member has elected, when first eligible, to make, and has continuously made..."

In asking what this is referencing, what was meant was "when first eligible" for what? Eligibility is stated several times, and it may be clear to you and me, but when a State or Local Government employee reads the Rule they may not know for what eligibility is being referenced. Can language be added to clarify this?

The text of the Rule in both (1) and (2) says, "'when first eligible' to make an election for coverage." This is the same thing that G.S. 135-5(l) is referring to where it says, "provided the retired member has elected, when first eligible, to make, and has continuously made..." Therefore, as to the question, "when first eligible' for what?", we believe the Rule is already very clear that the answer is, "when first eligible' to make an election for coverage."

Are the requirements and 60 day effective dates within items (1) and (2) within statute? Why is this Rule necessary? These requirements are not in statute. The phrase "when first eligible" is in statute, but is not sufficiently clear for administration. This is likely why the Boards adopted the Rule effective February 1, 1989 as part of the adoption of Subchapter 02M, although there is no further discussion on that point in the minutes of the October 27, 1988 meeting where it was adopted.

Consider updating the Authority G.S. 128-27(l2) and including (l3) through (l6) if it is desired for this Rule to affect more than January 1, 1999 through July 1, 2004. Agreed and corrected.

Please retype the rule accordingly and resubmit it to our office electronically.

Lawrence R. Duke
Commission Counsel

Date submitted to agency: December 7, 2022

REQUEST FOR § 150B-21.10 CHANGES

AGENCY: Teachers' and State Employees' Retirement System Board of Trustees AND
Local Governmental Employees' Retirement System Board of Trustees

RULE CITATION: 20 NCAC 02M .0301

DEADLINE FOR RECEIPT: Monday, December 12, 2022

PLEASE NOTE: This request may extend to several pages. Please be sure you have reached the end of the document.

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In reviewing this Rule, the staff recommends the following changes be made:

Insert an Oxford comma after "employees" in line 27 of page 2. Agreed and corrected.

Regarding the rates within (b), how does the Board's revision of the rates affect the Rule, if at all? Does a resolution by the Board changing the rates affect this Rule's text, or is the schedule more of a placeholder? Since the March 19, 1988 table described in (b), the Boards have since revised the premium rates pursuant to documents of the Boards (meeting minutes and materials that are part of the public record). These revisions have not affected the text because (c) provides the process for revision to occur.

If this is true, why are the rates still in the Rule? If they are not in effect, they should not remain. Is there a requirement for the rates to be in Rule? If (c) controls and there is no requirement that they be in rule, this text should be removed.

Based on your guidance, we have removed (b) from the current version, and re-ordered the previous (c) as (b), as immaterial changes.

In (c), clarify whether the revision "may be" or "shall be" "applicable to members electing coverage prior to the effective date..." Who makes such a determination and on what bases? Whether a revision is applicable to members who elected coverage in the past would be decided by the Boards based on their action in adopting a resolution pursuant to the process in (c). It is provided by (c) that the revision may be applicable to such retirees, if it does not increase the premium rates that were in effect for them before.

In addition, the Authorities of this rule has been updated to match other similar Authority updates requested for other rules (20 NCAC 02M .0302).

Please retype the rule accordingly and resubmit it to our office electronically.

Lawrence R. Duke
Commission Counsel

Date submitted to agency: December 7, 2022

REQUEST FOR § 150B-21.10 CHANGES

AGENCY: Teachers' and State Employees' Retirement System Board of Trustees AND
Local Governmental Employees' Retirement System Board of Trustees

RULE CITATION: 20 NCAC 02M .0303

DEADLINE FOR RECEIPT: Monday, December 12, 2022

PLEASE NOTE: This request may extend to several pages. Please be sure you have reached the end of the document.

The Rules Review Commission staff has completed its review of this Rule prior to the Commission's next meeting. The Commission has not yet reviewed this Rule and therefore there has not been a determination as to whether the Rule will be approved. You may email the reviewing attorney to inquire concerning the staff recommendation.

In reviewing this Rule, the staff recommends the following changes be made:

In (b), what "other required deductions" are referenced? By use of the word "required," the Rule is referring to mandatory payment deductions that are required, such as taxes and garnishments, as opposed to payment deductions that are voluntary on the part of the payee, such as for optional insurance coverage.

Can language be added to the Rule that will add clarity and specificity?

We have added the phrase "such as for taxes and garnishments" after "other required deductions."

What is the effect of the final clause in (b)? For each month the net monthly retirement allowance is insufficient, a notice will be sent 10 days after determination and the payment will be due by the 25th of the same month. What does the "thereafter" portion actually require? The effect of the final clause in (b) is as follows, by way of an example. If a retiree's Contributory Death Benefit Plan premium is \$20 per month, and the January 25, 2023 retirement allowance after required deductions is \$15 per month, the Retirement System will send the retiree a Notice of Contribution Due by early February 2023. The retiree would need to pay the premium of \$20 by February 25 to maintain coverage. The word "thereafter" means that after the month of February 2023, this retiree would receive a Notice of Contribution Due between the first and fifth of each month (March 2023 and later) and would be required to pay the \$20 premium by the 25th of each month to maintain coverage.

Also, how are the due dates different between the same month and subsequent months? As shown in the prior example and described in the Rule, the due date of the premium is the 25th of the month in both cases.

In line 19, change "and/or" to either "and" or "or". Agreed and corrected.

Also, clarify the "may be waived" requirement. Who may waive the contribution payment and under what circumstances or criteria? We have edited the text to describe the conditions under which the premium is waived, namely, "shall be waived if it has not been received by the Retirement Systems Division before the Retirement Systems Division issues the return of contributions."

Lawrence R. Duke
Commission Counsel

Date submitted to agency: December 7, 2022

In line 20, change “must” to “shall”. Use active voice. Agreed and corrected.

Correct the added paragraph in Authority. Agreed and corrected.

Consider updating the Authority G.S. 128-27(l2) and including (l3) through (l6) if it is desired for this Rule to affect more than January 1, 1999 through July 1, 2004. Agreed and corrected.

Please retype the rule accordingly and resubmit it to our office electronically.

20 NCAC 02M .0301 is amended as published in 36:23 NCR, page 1841, **with changes**, as follows:

SECTION .0300 - CONTRIBUTIONS AND BENEFITS

20 NCAC 02M .0301 CONTRIBUTION RATES

(a) The monthly contribution rates shall be established by resolution of the Boards of Trustees as recommended by the consulting actuary. The consulting actuary in making a recommended schedule of monthly contribution rates shall take into consideration mortality experience, selection experience, actuarial interest rate assumption which may be different from the interest rate assumption used in the valuation of the liabilities of the ~~retirement~~Retirement system, System, administrative and investment costs, and such other factors as may be appropriate in establishing such schedule of monthly contribution rates.

(b) The schedule of monthly contribution rates established by resolution of the Boards of Trustees adopted on March 19, 1988, is as follows:

Age at Effective Date	Monthly Rate For Life
Less than 50	\$8
50	8
51	9
52	10
53	10
54	11
55	12
56	12
57	13
58	14
59	15
60	16
61	17
62	18
63	20
64	21
65	22
66	24
67	26
68	27
69	29
70	31
71	33
72	35
73	38
74	40
75	43
76	46
77	49
78	52
79	56

1	80	59
2	81	63
3	82	67
4	83	71
5	84	75
6	85	80
7	86	84
8	87	89
9	88	94
10	89	99
11	90	105
12	91	110
13	92	115
14	93	120
15	94	125
16	95	130
17	96	140
18	97	150
19	98	160
20	99	170
21	100 and over	200

22
 23 The schedule of monthly contribution rates shall be applicable for members electing coverage effective on or after
 24 July 1, 1988 and shall remain in effect until such resolution, as duly adopted by the Boards of Trustees, revises such
 25 schedule of monthly contribution rates.

26 (e)(b) The Boards of Trustees may from time to time revise by resolution the schedule of monthly contribution rates
 27 as may be recommended by the consulting actuary for teachers, employees, employees and officials retiring and
 28 electing an effective date of coverage after the effective date of the revision. Such revision may be, but is not required
 29 to be, applicable to members electing coverage prior to the effective date of the revision provided that such revised
 30 rates shall not be greater than the rates in effect at the effective date of coverage for those members electing an effective
 31 date of coverage prior to the effective date of the revision.

32
 33 *History Note:* Authority G.S. 120-4.10; 120-4.27; 128-27(12); 128-27(13); 128-27(14); 128-27(15); 128-27(16);
 34 128-28(g); 135-5(1); 135-6(f); 135-64(g);
 35 Eff. February 1, 1989-1989;
 36 Amended Eff.

37

1 20 NCAC 02M .0303 is amended as published in 36:23 NCR, page 1842, **with changes**, as follows:

2
3
4 **20 NCAC 02M .0303 PAYMENT OF CONTRIBUTION**

5 (a) The monthly contributions of members covered under the Contributory Death Benefit for Retired Members are to
6 be paid monthly to the Contributory Death Benefit Trust for Retired Members beginning in the month in which
7 coverage becomes effective and shall continue each month thereafter.

8 (b) Payment of the monthly contributions shall be deducted from a member's net monthly retirement allowance from
9 the ~~retirement~~Retirement system~~System~~ if member's net monthly retirement allowance, after other required
10 deductions, **such as for taxes and garnishments**, is sufficient to cover the cost of the contribution; however, if the net
11 monthly retirement allowance from the ~~retirement~~Retirement system~~System~~ is not sufficient to cover the cost of the
12 contribution, the Retirement Systems Division shall provide the member a Notice of Contribution Due within ten days
13 after the determination of insufficiency with payment of monthly contributions due not later than the 25th of the month
14 following the determination of insufficiency, and thereafter a Notice of Contribution Due shall be provided between
15 the first and the fifth of each month with payment due on or before the 25th of that month.

16 (c) The contribution due for the month in which the member's death occurs is to be paid from the final monthly
17 retirement benefit due in the month of death, or by payment from the member's surviving spouse or legal
18 representative; provided that, if member's death occurs during the 24-month period from the effective date of coverage,
19 the deduction **or and/or** payment of the contribution for the month in which death occurs **shall may** be **waived. waived**
20 **if it has not been received by the Retirement Systems Division before the Retirement Systems Division issues the**
21 **return of contributions.**

22 (d) Once coverage is elected, the **member shall pay the** required monthly contribution **must be paid** in order to maintain
23 coverage regardless of any condition which might occur that would terminate or diminish the retirement benefit the
24 retired member is receiving, such as reemployment **or and** the reduction or termination of retirement benefits by reason
25 of ~~an optional payment plan~~ an optional form of retirement allowance selected by the retired member at retirement.

26
27 *History Note: Authority G.S. 120-4.10; 120-4.27; 128-27(12); **128-27(13); 128-27(14); 128-27(15); 128-27(16);***
28 *128-28(g); 135-5(l); 135-6(f); 135-64(g);*
29 *Eff. February 1, ~~1989~~1989;*
30 *Amended Eff.*
31

Burgos, Alexander N

Subject: FW: [External] 20 NCAC 02F, L, M, & N Response to Request for Changes; Rule Text Revisions
Attachments: 20 NCAC 02M - Remaining Issues - Response to Request for Changes.docx

From: Duke, Lawrence <lawrence.duke@oah.nc.gov>
Sent: Friday, January 13, 2023 1:10 PM
To: Rowe, Laura <laura.rowe@nctreasurer.com>
Cc: Melton, Timothy M <Timothy.Melton@nctreasurer.com>; Burgos, Alexander N <alexander.burgos@oah.nc.gov>
Subject: RE: [External] 20 NCAC 02F, L, M, & N Response to Request for Changes; Rule Text Revisions

Laura,

Thank you for all the work you did on this set of Rules. I had a few remaining issues, which are written in green beneath your red responses. Take a look and let me know if you have any questions.

Lawrence Duke
Counsel, NC Rules Review Commission
Office of Administrative Hearings
(984) 236-1938

From: Laura Rowe <Laura.Rowe@nctreasurer.com>
Sent: Monday, January 9, 2023 2:03 PM
To: Duke, Lawrence <lawrence.duke@oah.nc.gov>
Cc: Melton, Timothy M <Timothy.Melton@nctreasurer.com>
Subject: [External] 20 NCAC 02F, L, M, & N Response to Request for Changes; Rule Text Revisions

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Good Afternoon Lawrence,
Attached please find responses to the Request for Changes to rules in 20 NCAC 02F; 02L; 02M; & 02N along with rule text revisions. Please contact Tim Melton (814-4186) or me with any additional questions.

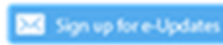
Thank you,

Laura

Laura Rowe
Compliance Officer
Office of the State Treasurer
Office: (919) 814-3851

3200 Atlantic Avenue, Raleigh, NC 27604

www.NCTreasurer.com



NORTH CAROLINA
DEPARTMENT OF STATE TREASURER



Dale R. Folwell, CPA
STATE TREASURER OF NORTH CAROLINA
DALE R. FOLWELL, CPA

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From: Duke, Lawrence <lawrence.duke@oah.nc.gov>
Sent: Wednesday, December 7, 2022 4:36 PM
To: Laura Rowe <Laura.Rowe@nctreasurer.com>; Timothy Melton <Timothy.Melton@nctreasurer.com>
Cc: Burgos, Alexander N <alexander.burgos@oah.nc.gov>
Subject: State Treasurer - 20 NCAC 02F, L, M, & N - Rules Review Commission

Good afternoon,

I'm the attorney who reviewed some of the Rules submitted by the State Treasurer for the December 2022 Rules Review Commission meeting. The RRC will formally review these Rules at its meeting on Thursday, December 15, 2022, at 9:00 a.m. The meeting will be a hybrid of in-person and WebEx attendance, and an evite should be sent to you as we get closer to the meeting. If there are any other representatives from your agency who will want to attend virtually, let me know prior to the meeting, and we will get evites out to them as well.

I have attached my requests for changes. Please submit the revised Rule and form to me via email, no later than 5:00 p.m. on Monday, December 12, 2022. In the meantime, please let me know if you have any questions or concerns.

Thank you,
Lawrence Duke

Counsel to the North Carolina Rules Review Commission
Office of Administrative Hearings
Lawrence.Duke@oah.nc.gov
(984) 236-1938

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Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

REQUEST FOR § 150B-21.10 CHANGES

AGENCY: Teachers' and State Employees' Retirement System Board of Trustees AND
Local Governmental Employees' Retirement System Board of Trustees

RULE CITATION: 20 NCAC 02M .0202

DEADLINE FOR RECEIPT: Monday, December 12, 2022

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In reviewing this Rule, the staff recommends the following changes be made:

In items (1) and (2), what is "when first eligible" referencing? This should be included in the Rule. It is referencing the phrase "when first eligible" that appears in the authorizing statutes in the History Note. For example, in G.S. 135-5(l), "... provided the retired member has elected, when first eligible, to make, and has continuously made..."

In asking what this is referencing, what was meant was "when first eligible" for what? Eligibility is stated several times, and it may be clear to you and me, but when a State or Local Government employee reads the Rule they may not know for what eligibility is being referenced. Can language be added to clarify this?

Are the requirements and 60 day effective dates within items (1) and (2) within statute? Why is this Rule necessary? These requirements are not in statute. The phrase "when first eligible" is in statute, but is not sufficiently clear for administration. This is likely why the Boards adopted the Rule effective February 1, 1989 as part of the adoption of Subchapter 02M, although there is no further discussion on that point in the minutes of the October 27, 1988 meeting where it was adopted.

Consider updating the Authority G.S. 128-27(l2) and including (l3) through (l6) if it is desired for this Rule to affect more than January 1, 1999 through July 1, 2004. Agreed and corrected.

Please retype the rule accordingly and resubmit it to our office electronically.

Lawrence R. Duke
Commission Counsel
Date submitted to agency: December 7, 2022

REQUEST FOR § 150B-21.10 CHANGES

AGENCY: Teachers' and State Employees' Retirement System Board of Trustees AND
Local Governmental Employees' Retirement System Board of Trustees

RULE CITATION: 20 NCAC 02M .0301

DEADLINE FOR RECEIPT: Monday, December 12, 2022

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In reviewing this Rule, the staff recommends the following changes be made:

Insert an Oxford comma after "employees" in line 27 of page 2. Agreed and corrected.

Regarding the rates within (b), how does the Board's revision of the rates affect the Rule, if at all? Does a resolution by the Board changing the rates affect this Rule's text, or is the schedule more of a placeholder? Since the March 19, 1988 table described in (b), the Boards have since revised the premium rates pursuant to documents of the Boards (meeting minutes and materials that are part of the public record). These revisions have not affected the text because (c) provides the process for revision to occur.

If this is true, why are the rates still in the Rule? If they are not in effect, they should not remain. Is there a requirement for the rates to be in Rule? If (c) controls and there is no requirement that they be in rule, this text should be removed.

In (c), clarify whether the revision "may be" or "shall be" "applicable to members electing coverage prior to the effective date..." Who makes such a determination and on what bases? Whether a revision is applicable to members who elected coverage in the past would be decided by the Boards based on their action in adopting a resolution pursuant to the process in (c). It is provided by (c) that the revision may be applicable to such retirees, if it does not increase the premium rates that were in effect for them before.

In addition, the Authorities of this rule has been updated to match other similar Authority updates requested for other rules (20 NCAC 02M .0302).

Please retype the rule accordingly and resubmit it to our office electronically.

Lawrence R. Duke
Commission Counsel

Date submitted to agency: December 7, 2022

REQUEST FOR § 150B-21.10 CHANGES

AGENCY: Teachers' and State Employees' Retirement System Board of Trustees AND
Local Governmental Employees' Retirement System Board of Trustees

RULE CITATION: 20 NCAC 02M .0303

DEADLINE FOR RECEIPT: Monday, December 12, 2022

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Can language be added to the Rule that will add clarity and specificity?

What is the effect of the final clause in (b)? For each month the net monthly retirement allowance is insufficient, a notice will be sent 10 days after determination and the payment will be due by the 25th of the same month. What does the "thereafter" portion actually require? The effect of the final clause in (b) is as follows, by way of an example. If a retiree's Contributory Death Benefit Plan premium is \$20 per month, and the January 25, 2023 retirement allowance after required deductions is \$15 per month, the Retirement System will send the retiree a Notice of Contribution Due by early February 2023. The retiree would need to pay the premium of \$20 by February 25 to maintain coverage. The word "thereafter" means that after the month of February 2023, this retiree would receive a Notice of Contribution Due between the first and fifth of each month (March 2023 and later) and would be required to pay the \$20 premium by the 25th of each month to maintain coverage.

Also, how are the due dates different between the same month and subsequent months? As shown in the prior example and described in the Rule, the due date of the premium is the 25th of the month in both cases.

In line 19, change "and/or" to either "and" or "or". Agreed and corrected.

Also, clarify the "may be waived" requirement. Who may waive the contribution payment and under what circumstances or criteria? We have edited the text to describe the conditions under which the premium is waived, namely, "shall be waived if it has not been received by the Retirement Systems Division before the Retirement Systems Division issues the return of contributions."

In line 20, change "must" to "shall". Use active voice. Agreed and corrected.

Lawrence R. Duke
Commission Counsel

Date submitted to agency: December 7, 2022

Correct the added paragraph in Authority. Agreed and corrected.

Consider updating the Authority G.S. 128-27(12) and including (13) through (16) if it is desired for this Rule to affect more than January 1, 1999 through July 1, 2004. Agreed and corrected.

Please retype the rule accordingly and resubmit it to our office electronically.

Burgos, Alexander N

From: Duke, Lawrence
Sent: Wednesday, December 7, 2022 4:36 PM
To: Rowe, Laura; Melton, Timothy M
Cc: Burgos, Alexander N
Subject: State Treasurer - 20 NCAC 02F, L, M, & N - Rules Review Commission
Attachments: State Treasurer - 12.2022 - 20 NCAC 02F_02L_02M_02N - Change Requests.docx

Good afternoon,

I'm the attorney who reviewed some of the Rules submitted by the State Treasurer for the December 2022 Rules Review Commission meeting. The RRC will formally review these Rules at its meeting on Thursday, December 15, 2022, at 9:00 a.m. The meeting will be a hybrid of in-person and WebEx attendance, and an evite should be sent to you as we get closer to the meeting. If there are any other representatives from your agency who will want to attend virtually, let me know prior to the meeting, and we will get invites out to them as well.

I have attached my requests for changes. Please submit the revised Rule and form to me via email, no later than 5:00 p.m. on Monday, December 12, 2022. In the meantime, please let me know if you have any questions or concerns.

Thank you,
Lawrence Duke

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