

## **FINAL STATEMENT OF REASONS**

### **Update of Initial Statement of Reasons**

The proposed regulations were made available to the public from July 21, 2023 through September 13, 2023. A public hearing was held on September 14, 2023. CalSTRS received one written comment during the public comment period from the California County Superintendents expressing support for the regulation and applauding leadership and staff for collaborating with educational partners on this rulemaking effort. No other comments were received in writing or verbally at the public hearing.

There were no changes to the proposed regulations as originally noticed to the public.

### **Alternatives Determination**

CalSTRS has determined that no reasonable alternative considered by the agency or that has otherwise been identified and brought to the attention of the agency would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. No alternatives were raised during the regulatory process beyond the one discussed in the Initial Statement of Reasons.

### **Local Mandate Determination**

CalSTRS has determined that the regulations proposed do not constitute a mandate on school districts or other local agencies. The regulations do not mandate a new program or require a higher level of service in an existing program. The regulations provide clarifications consistent with the intent of the original statute.