



July 10, 2025

Re: Retirees Returning to Work: Important Deadline and Updates

Dear CCCERA Participating Employer,

The purpose of this notice is to provide you with a reminder of an important deadline coming up in just a few weeks regarding retiree return-to-work reporting, and give you an update on some additional procedures related to this matter.

Retiree Return-to-Work Reporting Due to CCCERA by August 1, 2025

In light of a recent legislative change, all participating employers must now provide reports by August 1st of each year to the CCCERA Retirement Services Manager. (You may recall that we sent a letter to you about this on November 7, 2024. A copy of that letter is available [here](#).) The report must list all retirees employed by the participating employer who have not been reinstated into membership or are not classified as an independent contractor, and it must include the following information for each retiree: (1) name of retiree; (2) hire date; (3) rate of pay; and (4) total hours worked.

You should email this report to employers@cccera.gov. Your email must also include a statement certifying that proper procedures were followed regarding retirees returning to work, and that you have maintained proper documentation for those retirees. This reporting requirement is a result of Assembly Bill 2474, which took effect on January 1, 2025. The bill also provides for monetary fines if certain rules are not followed, including the reporting outlined above. Please submit the report by the August 1 deadline.

Form 213 Updates

In order to comply with the recent legislative changes, CCCERA requires that the Form 213 “Certification for Post-Retirement Employment” be submitted at least 10 business days prior to a retiree’s first day of post-retirement employment. This form must be submitted for all retirees who are returning to work, including contract employees or independent contractors. For

retirees that return as a contract employee or independent contractor, you will also be required to submit a copy of the applicable employment agreement or contract. Depending on the circumstances of employment, legal restrictions may still apply—even if you classified the retiree as an independent contractor. For additional information regarding the proper classification of independent contractors, please see:

- https://www.dir.ca.gov/dlse/faq_independentcontractor.htm
- <https://www.irs.gov/newsroom/worker-classification-101-employee-or-independent-contractor>

Form 213 has recently been updated, and a copy of the current version can be found on the Employer page of our website: <https://www.cccera.gov/employers>.

Updates to Procedures and Participating Employer Handbook

An additional requirement you should be aware of is that employers must establish internal controls to alert retirees and the appropriate employer resources (e.g. management staff or the retiree's supervisor), when the retiree is approaching within 80 hours of the 960-hour limitation. Form 213 has been updated to include a statement acknowledging that the employer will follow this rule.

We have also updated the Participating Employers Handbook to reflect the updates and information provided above. You can always find the current version of the handbook on the Employer page of our website: <https://www.cccera.gov/employers>.

If you have questions, you can send an email to our Employer Support Team at employers@cccera.gov. We're always happy to help with any questions you may have about this or any other topic.

Respectfully,



Christina Dunn
Chief Executive Officer