

# COMPLIANCE AUDIT

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## Dunmore Borough Firemen's Pension Plan Lackawanna County, Pennsylvania For the Period January 1, 2011 to December 31, 2014

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September 2015



Commonwealth of Pennsylvania  
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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EUGENE A. DePASQUALE  
AUDITOR GENERAL

The Honorable Mayor and Borough Council  
Dunmore Borough  
Lackawanna County  
Dunmore, PA 18512

We have conducted a compliance audit of the Dunmore Borough Firemen's Pension Plan for the period January 1, 2011 to December 31, 2014. We also evaluated compliance with some requirements subsequent to that period when possible. The audit was conducted pursuant to authority derived from Section 402(j) of Act 205 and in accordance with the standards applicable to performance audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform our audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The objectives of the audit were:

1. To determine if municipal officials took appropriate corrective action to address the findings contained in our prior audit report; and
2. To determine if the pension plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies.

Our audit was limited to the areas related to the objectives identified above. To determine if municipal officials took appropriate corrective action to address the findings contained in our prior audit report, we inquired of plan officials and evaluated supporting documentation provided by officials evidencing that the suggested corrective action has been appropriately taken. To determine whether the pension plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies, our methodology included the following:

- × We determined whether state aid was properly determined and deposited in accordance with Act 205 requirements by verifying the annual deposit date of state aid and determining whether deposits were made within 30 days of receipt for all years within the period under audit.

- × We determined whether annual employer contributions were calculated and deposited in accordance with the plan's governing document and applicable laws and regulations by examining the municipality's calculation of the plan's annual financial requirements and minimum municipal obligation (MMO) and comparing these calculated amounts to amounts actually budgeted and deposited into the pension plan as evidenced by supporting documentation.
- × We determined whether annual employee contributions were calculated, deducted, and deposited into the pension plan in accordance with the plan's governing document and applicable laws and regulations by testing members' contributions on an annual basis using the rates obtained from the plan's governing document in effect for all years within the period under audit and examining documents evidencing the deposit of these employee contributions into the pension plan.
- × We determined whether retirement benefits calculated for all 4 of the plan members who retired during the current audit period, and through the completion of our fieldwork procedures, represent payments to all those entitled to receive them and were properly determined and disbursed in accordance with the plan's governing document, applicable laws and regulations by recalculating the amount of the monthly pension benefit due to the retired individuals and comparing these amounts to supporting documentation evidencing amounts determined and actually paid to the recipients.
- × We determined whether the January 1, 2011 and January 1, 2013 actuarial valuation reports were prepared and submitted to the Public Employee Retirement Commission (PERC) by March 31, 2012 and 2014, respectively, in accordance with Act 205 and whether selected information provided on these reports is accurate, complete, and in accordance with plan provisions to ensure compliance for participation in the state aid program by comparing selected information to supporting source documentation.
- × We determined whether all annual special ad hoc postretirement reimbursements received by the municipality were authorized and appropriately deposited in accordance with Act 147 by tracing information to supporting documentation maintained by plan officials.
- × We determined whether the terms and methodologies of the issuance of pension obligation bonds or notes by the municipality, and any restrictions were in compliance with plan provisions and Act 205 through inquiry of plan officials and examination of supporting documentation for pension obligation bonds or notes issued during the current audit period and through the completion of our fieldwork procedures.

Dunmore Borough contracted with an independent certified public accounting firm for annual audits of its basic financial statements which are available at the borough's offices. Those financial statements were not audited by us and, accordingly, we express no opinion or other form of assurance on them.

Borough officials are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the Dunmore Borough Firemen’s Pension Plan is administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies. In conducting our audit, we obtained an understanding of the borough’s internal controls as they relate to the borough’s compliance with those requirements and that we considered to be significant within the context of our audit objectives, and assessed whether those significant controls were properly designed and implemented. Additionally and as previously described, we tested transactions, assessed official actions, performed analytical procedures, and interviewed selected officials to provide reasonable assurance of detecting instances of noncompliance with legal and regulatory requirements or noncompliance with provisions of contracts, administrative procedures, and local ordinances and policies that are significant within the context of the audit objectives.

The results of our procedures indicated that, in all significant respects, the Dunmore Borough Firemen’s Pension Plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies, except as noted in the following findings further discussed later in this report:

- Finding No. 1 – Noncompliance With Prior Audit Recommendation – Improper Cost-Of-Living Adjustments
- Finding No. 2 – Noncompliance With Prior Audit Recommendation – Incorrect Data On Certification Form AG 385 Resulting In An Overpayment Of State Aid
- Finding No. 3 – Failure To Pay The Minimum Municipal Obligation Of The Plan

Finding Nos. 1 and 2 contained in this audit report repeat conditions that were cited in our previous audit report that have not been corrected by borough officials. We are concerned by the borough’s failure to correct these previously reported audit findings and strongly encourage timely implementation of the recommendations noted in this audit report.

As previously noted, one of the objectives of our audit of the Dunmore Borough Firemen’s Pension Plan was to determine compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies. Act 205 was amended on September 18, 2009, through the adoption of Act 44 of 2009. Among several provisions relating to municipal pension plans, the act provides for the implementation of a distress recovery program. Three levels of distress have been established:

<u>Level</u>	<u>Indication</u>	<u>Funding Criteria</u>
I	Minimal distress	70-89%
II	Moderate distress	50-69%
III	Severe distress	Less than 50%

The accompanying supplementary information is presented for purposes of additional analysis. We did not audit the information or conclude on it and, accordingly, express no form of assurance on it. However, **we are extremely concerned about the historical trend information contained in the schedule of funding progress included in this report which indicates a continued decline of assets available to satisfy the long-term liabilities of the plan. The plan's funded ratio went from 65.6% as of January 1, 2011, to a ratio of 52.5% as of January 1, 2013, which is the most recent data available. Based on this information, and the funding status of the borough's police and non-uniformed pension plans, pursuant to Act 205 distress levels, the borough is currently in Level III severe distress status.** While we acknowledge that the borough deposited note proceeds in the amount of \$1,757,373 into the plan which will be reflected in the plan's January 1, 2015 actuarial valuation report, we encourage borough officials to monitor the funding of the firemen's pension plan to ensure its long-term financial stability.

The contents of this report were discussed with officials of Dunmore Borough and, where appropriate, their responses have been included in the report. We would like to thank borough officials for the cooperation extended to us during the conduct of the audit.

August 7, 2015



EUGENE A. DEPASQUALE  
Auditor General

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## BACKGROUND

On December 18, 1984, the Pennsylvania Legislature adopted the Municipal Pension Plan Funding Standard and Recovery Act (P.L. 1005, No. 205, as amended, 53 P.S. § 895.101 et seq.). The act established mandatory actuarial reporting and funding requirements and a uniform basis for the distribution of state aid to Pennsylvania's public pension plans. Section 402(j) of Act 205 specifically requires the Auditor General, as deemed necessary, to make an audit of every municipality which receives general municipal pension system state aid and of every municipal pension plan and fund in which general municipal pension system state aid is deposited.

Annual state aid allocations are provided from a 2 percent foreign (out-of-state) casualty insurance premium tax, a portion of the foreign (out-of-state) fire insurance tax designated for paid firefighters and any investment income earned on the collection of these taxes. Generally, municipal pension plans established prior to December 18, 1984, are eligible for state aid. For municipal pension plans established after that date, the sponsoring municipality must fund the plan for three plan years before it becomes eligible for state aid. In accordance with Act 205, a municipality's annual state aid allocation cannot exceed its actual pension costs.

In addition to Act 205, the Dunmore Borough Firemen's Pension Plan is also governed by implementing regulations adopted by the Public Employee Retirement Commission published at Title 16, Part IV of the Pennsylvania Code and applicable provisions of various other state statutes including, but not limited to, the following:

Act 147 - Special Ad Hoc Municipal Police and Firefighter Postretirement Adjustment Act, Act of December 14, 1988 (P.L. 1192, No. 147), as amended, 53 P.S. § 896.101 et seq.

The Dunmore Borough Firemen's Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of Ordinance No. 4 of 1955, as amended. The plan is also affected by the provisions of collective bargaining agreements between the borough and its firefighters. The plan was established January 1, 1955. Active members are required to contribute 3 percent of compensation to the plan. As of December 31, 2014, the plan had 15 active members, no terminated members eligible for vested benefits in the future, and 19 retirees receiving pension benefits from the plan.

## **BACKGROUND – (Continued)**

As of December 31, 2014, selected plan benefit provisions are as follows:

### Eligibility Requirements:

Normal Retirement	Age 53 and 25 years of service.
Early Retirement	None
Vesting	A member is 100% vested after 12 years of service.

### Retirement Benefit:

Monthly benefit equal to 50% of average compensation. Pension payable in the form of a life annuity. Average compensation is the highest 36 consecutive months of the 60 month period preceding the date of determination plus 60% of the allowable accumulated sick pay.

### Survivor Benefit:

Accrued benefit at the date of death, payable immediately and actuarially reduced for a joint and 100% survivor option.

### Service Related Disability Benefit:

Permanent and total disability as confirmed by the firemen's pension board. The accrued benefit at the date of disability.



DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
STATUS OF PRIOR FINDINGS

Noncompliance With Prior Audit Recommendations

Dunmore Borough has not complied with the prior audit recommendations concerning the following as further discussed in the Findings and Recommendations section of this report:

- Improper Cost-Of-Living Adjustments
- Incorrect Data On Certification Form AG 385 Resulting In An Underpayment Of State Aid

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
FINDINGS AND RECOMMENDATIONS

**Finding No. 1 – Noncompliance With Prior Audit Recommendation – Improper Cost-Of-Living Adjustments**

Condition: As disclosed in the prior audit report, the borough granted retroactive cost-of-living adjustments (COLAs) for the years 2004 through 2009 to 4 retirees and a surviving spouse of a retiree who were not eligible to receive them according to the plan document since all of the retirees had retired prior to January 1, 1998.

Criteria: Ordinance No. 1 of 2001 states, in part:

Cost of living allowances shall be computed only for retirees who retired on or after January 1, 1998. COLA shall be calculated on a calendar year basis commencing January 1st of each year. A pensioner is not entitled to his/her first COLA until he/she has been retired a minimum of 12 months.

Cause: Municipal officials failed to establish adequate procedures to ensure that COLAs were only paid to eligible beneficiaries. In addition, municipal officials failed to establish adequate internal control procedures to ensure compliance with the prior audit recommendation.

Effect: In 2009, the borough disbursed \$21,593 in retroactive COLA benefits from the pension plan to these 5 recipients. In November 2009, one of the retirees passed away with no surviving beneficiary; however, the pension plan continues to pay \$506 per month in excess COLA benefits to the 4 remaining recipients. Providing excess benefits increases the plan's pension costs and reduces the amount of funds available for investment purposes or the payment of authorized benefits or administrative expenses. In addition, these excess benefits could also increase the municipal contributions necessary to fund the plan in accordance with Act 205 funding standards.

Recommendation: We again recommend that all pension benefits be paid in accordance with the provisions contained in the plan's governing document and the benefit payments to the aforementioned retirees and surviving spouse be adjusted prospectively. To the extent that the borough has already obligated itself to pay benefits in excess of those authorized by the plan's governing document, the excess benefits must be reflected in the Act 205 actuarial valuation reports for the plan and funded in accordance with Act 205 funding standards. Furthermore, the unauthorized portion of such benefits will be deemed ineligible for funding with state pension aid. In such case, the plan's actuary may be required to determine the impact, if any, of the unauthorized benefits on the plan's future state aid allocations and submit this information to the department.

Management's Response: The plan's ordinance will be amended to include language that COLAs should cease when the maximum amount is paid. Any excess COLAs being paid will continue to be reflected on the actuarial valuation report and will be frozen at the current percentage going forward.

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
FINDINGS AND RECOMMENDATIONS

**Finding No. 1 – (Continued)**

Auditor's Conclusion: The COLA benefits that continue to be paid to the 4 recipients are not in accordance with the provisions of plan's governing document; therefore, based on the criteria previously cited, the finding remains as stated. We are concerned by the borough's failure to comply with the prior audit recommendation and encourage compliance at the earliest opportunity to do so.

**Finding No. 2 – Noncompliance With Prior Audit Recommendation – Incorrect Data On Certification Form AG 385 Resulting In An Overpayment Of State Aid**

Condition: As disclosed in the prior audit report, the borough certified incorrect data on the 2010 and 2011 Certification Forms AG 385 resulting in a net underpayment of state aid to the borough. During the current audit, it was determined the borough certified an ineligible firefighter (2 units) and overstated payroll by \$12,505 on the Certification Form AG 385 filed in 2012. The data contained on this certification form is based on prior calendar year information.

Criteria: Pursuant to Act 205, at Section 402(e)(2), in order to be eligible for certification, an employee must have been employed on a full-time basis for at least six consecutive months and must have been participating in a pension plan during the certification year.

Cause: Plan officials failed to establish adequate internal control procedures to ensure the accuracy of the data certified and to ensure compliance with the prior audit recommendation.

Effect: The data submitted on this certification form is used, in part, to calculate the state aid due to the municipality for distribution to its pension plans. Because the borough's state aid allocation was based on unit value, the incorrect certification of pension data affected the borough's state aid allocation, as identified below:

<u>Units Overstated</u>	<u>Unit Value</u>	<u>State Aid Overpayment</u>
2	\$ 3,576	\$ 7,152

In addition, the borough used the overpayment of state aid to pay the minimum municipal obligation (MMO) due to the firemen's pension plan; therefore, if the reimbursement to the Commonwealth is made from the pension plan, the plan's MMO will not be fully paid.

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
FINDINGS AND RECOMMENDATIONS

**Finding No. 2 – (Continued)**

Recommendation: We recommend that the total excess state aid, in the amount of \$7,152, be returned to the Commonwealth. A check in this amount, with interest compounded annually from date of receipt to date of repayment, at a rate earned by the pension plan, should be made payable to: Commonwealth of Pennsylvania and mailed to: Department of the Auditor General, Municipal Pension & Fire Relief Programs Unit, 320 Finance Building, Harrisburg, PA 17120. A copy of the interest calculation must be submitted along with the check.

We also recommend that in the future, plan officials establish adequate internal control procedures, such as having at least 2 people review the data certified, to ensure compliance with the instructions that accompany Certification Form AG 385 to assist them in accurately reporting the required pension data.

In addition, if the reimbursement to the Commonwealth is made from firemen's pension plan funds, we recommend that any resulting MMO deficiency be paid to the pension plan with interest, at a rate earned by the pension plan.

Management's Response: Municipal officials agreed with the finding without exception.

Auditor's Conclusion: We are concerned by the borough's failure to comply with the prior audit recommendation and encourage compliance at the earliest opportunity to do so.

**Finding No. 3 – Failure To Pay The Minimum Municipal Obligation Of The Plan**

Condition: Plan officials did not pay the minimum municipal obligation (MMO) of the firemen's pension plan for the year 2014, as required by Act 205. The borough issued a \$5,000,000 General Obligation Note on February 5, 2013 under the act of July 12, 1972 (P.L. 781, No. 185), known as the Local Government Unit Debt Act to fund its pension obligations, and subsequently deposited \$1,757,373 into the plan on March 14, 2013. The borough considered this deposit as a payment of the balance due on the 2012, and the full payment of the 2013, 2014, and subsequent minimum municipal obligations (MMOs) and did not make any additional municipal contributions to the plan in 2013 or 2014. The note proceeds fully funded the \$267,870 balance of the 2012 MMO, plus interest, and the 2013 MMO of \$371,494; however, pursuant to Act 205 provisions, since the deposit of the note proceeds was made in 2013, the borough cannot use these funds towards their 2014 MMO. Therefore, based on the borough's original 2014 MMO determination, the borough has an unpaid 2014 MMO balance of \$382,837.

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
FINDINGS AND RECOMMENDATIONS

**Finding No. 3 – (Continued)**

Criteria: Regarding the proper determination of the MMO, Section 302(c) of Act 205 states, in part:

Annually, the chief administrative officer of the pension plan shall determine the minimum obligation of the municipality with respect to the pension plan for the following plan year. (Emphasis added)

Furthermore, in regards to funding the MMO, Section 302(d) of Act 205 states:

Annually the municipality shall provide for the full amount of the minimum obligation of the municipality in the budget of the municipality. The minimum obligation of the municipality shall be payable to the pension plan from the revenue of the municipality. Payment of the minimum obligation of the municipality shall be made by the municipality prior to December 31. (Emphasis added)

In addition, Section 302(e) of Act 205 also states:

Any amount of the minimum obligation of the municipality which remains unpaid as of December 31 of the year in which the minimum obligation is due shall be added to the minimum obligation of the municipality for the following year, with interest from January 1 of the year in which the minimum obligation was first due until the date the payment is paid at a rate equal to the interest assumption used for the actuarial valuation report or the discount rate applicable to treasury bills issued by the Department of Treasury of the United States with a six-month maturity as of the last business day in December of the plan year in which the obligation was due, whichever is greater, expressed as a monthly rate and compounded monthly.

Cause: The failure to pay the MMO occurred because borough officials were unaware that the deposit of the proceeds from the note issuance in 2013 could not be used to fund subsequent MMOs due to the plan.

Effect: The proper determination of the plan's MMO ensures plan officials can properly allocate the necessary resources to the pension plan for the upcoming year. The failure to pay the MMO could result in the plan not having adequate resources to meet current and future benefit obligations to its members. Furthermore, the borough's future state aid allocations may be withheld until the finding recommendation is complied with.

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
FINDINGS AND RECOMMENDATIONS

**Finding No. 3 – (Continued)**

**Recommendation:** We recommend that the municipality pay the MMO due to the firemen's pension plan for the year 2014, with interest, in accordance with Section 302(e) of Act 205. A copy of the interest calculation must be maintained by the borough for examination during our next audit of the plan.

**Management's Response:** In December 2012, Borough Council passed a resolution to borrow \$5,000,000 in a proactive effort to shore up our pension plans. Our goal was to bring outstanding liabilities of the plan to present, while providing future obligations adequate funding as to not be burdensome to a challenging budget process. Further, the note would serve to spread the rising cost of the pension obligations (both past and future) over a 10-year amortization period. This information was subsequently communicated to our plan actuary and the Public Employee Retirement Commission. The Commission agreed at the time to allow us to hold the \$5,000,000 proceeds as a contribution receivable in the respective plans.

It is important to note that this was the intent of the Borough. We most certainly could have placed the \$5,000,000 proceeds in the general fund and transfer the money when the MMOs became due. With the very competitive interest rates that were offered to us, Council chose to put the entire amount into the funds with the hopes that our new investment managers would yield higher rates of return, while reducing future obligations at the same time.

**Auditor's Conclusion:** Act 205 does not provide for prepayment of MMOs, as each municipality is required to annually budget, determine, and pay the MMO due to the plan. The proceeds from the note deposited in 2013 can be applied towards the 2012 and 2013 MMOs due and the additional funds are considered an additional municipal contribution which will reduce the plan's unfunded actuarial accrued liability. The effect of the deposit of the note proceeds will be reflected in the plan's January 1, 2015, actuarial valuation report. Therefore, based on the Criteria previously cited, the finding and recommendation remain as stated. Due to the potential withhold of state aid, the borough's compliance with the finding recommendation will be monitored subsequent to the release of the audit report and through our next audit of the plan.

We further recommend that the borough seek guidance from their solicitor to determine an acceptable means to resolve the finding as stated.

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
POTENTIAL WITHHOLD OF STATE AID

A condition such as that reported by Finding No. 3 contained in this audit report may lead to a total withholding of state aid in the future unless that finding is corrected. However, such action will not be considered if sufficient written documentation is provided to verify compliance with this department's recommendation. Such documentation should be submitted to: Department of the Auditor General, Bureau of Municipal Pension & Liquor Control Audits, 314 Finance Building, Harrisburg, PA 17120.

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
 SUPPLEMENTARY INFORMATION  
 (UNAUDITED)

SCHEDULE OF FUNDING PROGRESS

Historical trend information about the plan is presented herewith as supplementary information. It is intended to help users assess the plan's funding status on a going-concern basis, assess progress made in accumulating assets to pay benefits when due, and make comparisons with other state and local government retirement systems.

The actuarial information is required by Act 205 biennially. The historical information, beginning as of January 1, 2009, is as follows:

	(1)	(2)	(3)	(4)
Actuarial Valuation Date	Actuarial Value of Assets (a)	Actuarial Accrued Liability (AAL) - Entry Age (b)	Unfunded (Assets in Excess of) Actuarial Accrued Liability (b) - (a)	Funded Ratio (a)/(b)
01-01-09	\$ 2,559,445	\$ 4,615,615	\$ 2,056,170	55.5%
01-01-11	2,975,643	4,535,753	1,560,110	65.6%
01-01-13	2,666,893	5,077,920	2,411,027	52.5%

The market values of the plan's assets at 01-01-09, 01-01-11 and 01-01-13 have been adjusted to reflect the smoothing of gains and/or losses over a 5-year averaging period. This method will lower contributions in years of less than expected returns and increase contributions in years of greater than expected returns. The net effect over long periods of time is to have less variance in contribution levels from year to year.

The January 1, 2013, actuarial data is from the revised actuarial valuation report submitted to the Public Employee Retirement Commission (PERC) in July of 2015.



DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
SUPPLEMENTARY INFORMATION  
(UNAUDITED)

The comparability of trend information is affected by changes in actuarial assumptions, benefit provisions, actuarial funding methods, accounting policies, and other changes. Those changes usually affect trends in contribution requirements and in ratios that use the actuarial accrued liability as a factor.

Analysis of the dollar amount of the actuarial value of assets, actuarial accrued liability, and unfunded (assets in excess of) actuarial accrued liability in isolation can be misleading. Expressing the actuarial value of assets as a percentage of the actuarial accrued liability (Column 4) provides one indication of the plan's funding status on a going-concern basis. Analysis of this percentage, over time, indicates whether the system is becoming financially stronger or weaker. Generally, the greater this percentage, the stronger the plan.

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
SUPPLEMENTARY INFORMATION  
(UNAUDITED)

SCHEDULE OF CONTRIBUTIONS FROM EMPLOYER  
AND OTHER CONTRIBUTING ENTITIES

Year Ended December 31	Annual Required Contribution	Percentage Contributed
2009	\$ 279,998	124.1%
2010	293,485	100.0%
2011	395,537	100.0%
2012	409,870	100.0%
2013	371,494	100.0%
2014	382,837	0.0%

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
SUPPLEMENTARY INFORMATION  
NOTES TO SUPPLEMENTARY SCHEDULES  
(UNAUDITED)

The information presented in the supplementary schedules was determined as part of the actuarial valuation at the date indicated. Additional information as of the latest actuarial valuation date follows:

Actuarial valuation date	January 1, 2013
Actuarial cost method	Entry age normal
Amortization method	Level dollar
Remaining amortization period	6 years
Asset valuation method	Fair value, 5-year smoothing
Actuarial assumptions:	
Investment rate of return	8.0%
Projected salary increases	6.0%

DUNMORE BOROUGH FIREMEN'S PENSION PLAN  
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Tom W. Wolf  
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Commonwealth of Pennsylvania

Dunmore Borough Firemen's Pension Plan  
Lackawanna County  
400 South Blakely Street  
Dunmore, PA 18512

The Honorable Patrick W. Loughney	Mayor
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