CITY OF ALIQUIPPA POLICE PENSION PLAN

BEAVER COUNTY

COMPLIANCE AUDIT REPORT

FOR THE PERIOD

JANUARY 1, 2011 TO DECEMBER 31, 2012

COMMONWEALTH OF PENNSYLVANIA

EUGENE A. DEPASQUALE - AUDITOR GENERAL

DEPARTMENT OF THE AUDITOR GENERAL

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EUGENE A. DEPASQUALE
AUDITOR GENERAL

The Honorable Mayor and City Council
City of Aliquippa
Beaver County
Aliquippa, PA 15001

We have conducted a compliance audit of the City of Aliquippa Police Pension Plan for the period January 1, 2011 to December 31, 2012. 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. Our methodology addressed determinations about the following:

- Whether state aid was properly determined and deposited in accordance with Act 205 requirements.

- Whether employer contributions are determined and deposited in accordance with the plan's governing document and applicable laws and regulations.

- Whether employee contributions are required and, if so, are determined, deducted and deposited into the pension plan and are in accordance with the plan provisions and applicable laws and regulations.

- Whether benefit payments, if any, represent payments to all (and only) those entitled to receive them and are properly determined in accordance with applicable laws and regulations.

- Whether obligations for plan benefits are accurately determined in accordance with plan provisions and based on complete and accurate participant data; and whether actuarial valuation reports are prepared and submitted to the Public Employee Retirement Commission (PERC) in accordance with state law and 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.

- Whether the special ad hoc postretirement adjustment granted to eligible pensioners is in accordance with applicable laws and regulations and whether the ad hoc reimbursement received by the municipality was treated in accordance with applicable laws and regulations.

- Whether the pension plan is in compliance with state regulations for distressed municipalities.

The City of Aliquippa contracted with an independent certified public accounting firm for an audit of its basic financial statements for the year ended December 31, 2011, which is available at the city's offices. Those financial statements were not audited by us and, accordingly, we express no opinion or other form of assurance on them.

City officials are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the City of Aliquippa Police 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 city's internal controls as they relate to the city'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, 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 tests indicated that, in all significant respects, the City of Aliquippa Police 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 - Incorrect Data On Certification Form AG 64 Resulting In Excess Reimbursements For Special 2002 Ad Hoc Postretirement Adjustment
Finding No. 2	–	Noncompliance With Prior Audit Recommendation - Pension Benefit Not Authorized By The Third Class City Code And The Plan's Governing Document
Finding No. 3	–	Failure To Implement Act 44 Mandatory Distressed Provisions
Finding No. 4	–	Custodial Account Transactions Not Adequately Monitored By The Municipality
Finding No. 5	–	Failure To File Certification Form AG 64 Resulting In An Underpayment Of Reimbursement For Special 2002 Ad Hoc Postretirement Adjustment

As previously noted, one of the objectives of our audit of the City of Aliquippa Police Pension Plan was to determine compliance with applicable state laws, contracts, administrative procedures, and local ordinance 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:

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

The accompanying supplementary information is presented for purpose of additional analysis. We did not audit the information and, accordingly, express no form of assurance on it. However, we are extremely concerned about the funded status of the plan contained in the schedule of funding process including in this report which indicates **the plan's funded ratio is 60.1% as of January 1, 2011**, which is the most recent date available. **Based on this information, the Public Employee Retirement Commission issued a notification that the city is currently in Level II moderate distress status.** We encourage city officials to monitor the funding of the police pension plan to ensure its long-term financial stability.

The deterioration of the plan's funded status has been exacerbated, as noted in the Comments section of this audit report, by the City's practice of determining pension benefits for its police officers based on their final months' accumulated earnings, which include overtime and additional payments for leave accruals. This methodology has resulted in pension benefit determinations that are much greater than 50 percent of the respective retirees' final annual base pay. We encourage city officials to make fiscally responsible decisions as plan fiduciaries that will benefit the City of Aliquippa and its taxpayers to ensure the city's pension plans have adequate resources to meet current and future benefit obligations to the city's hard working municipal employees that are determined in accordance with the provisions and the intent of the Third Class City Code.

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

December 9, 2013

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 City of Aliquippa Police 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.

Act 317 - The Third Class City Code, Act of June 23, 1931 (P.L. 932, No. 317), as amended, 53 P.S. § 35101 et seq.

The City of Aliquippa Police Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of Ordinance No. 2 of 2008, as amended, adopted pursuant to Act 317. The plan is also affected by the provisions of collective bargaining agreements between the city and its police officers. As of December 31, 2012, the plan had 18 active members, no terminated members eligible for vested benefits in the future and 23 retirees receiving pension benefits.

CITY OF ALIQUIPPA POLICE PENSION PLAN
STATUS OF PRIOR FINDINGS

Noncompliance With Prior Audit Recommendations

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

- Incorrect Data On Certification Form AG 64 Resulting In An Excess Reimbursement For Special 2002 Ad Hoc Postretirement Adjustment

- Pension Benefit Not Authorized By The Third Class City Code And The Plan's Governing Document

Finding No. 1 – Noncompliance With Prior Audit Recommendation - Incorrect Data On Certification Form AG 64 Resulting In Excess Reimbursements For Special 2002 Ad Hoc Postretirement Adjustment

Condition: As disclosed in our prior audit report, the city overstated the non-employee contributions made to all pension plans on the Certification Form AG 64 filed for 2010. In addition, the city overstated the non-employee contributions made to all pension plans on the Certification Form AG 64 filed for 2012.

Criteria: Section 502.1(a)(2) of Act 147 states, in part:

> The determination of the reimbursable amount of the amortization contribution requirement attributable to the special ad hoc postretirement adjustment under Chapter 4 in any year shall be calculated as the amortization contribution requirement attributable to the special ad hoc postretirement adjustments under Chapter 4 and reflected in the determination of the financial requirements of the pension plan under Chapter 3 of the Municipal Pension Plan Funding Standard and Recovery Act for the immediate prior year less the product of that amortization contribution requirement multiplied by the ratio of the amount of general municipal pension system state aid allocated to the retirement system in the immediate prior year to the total amount of municipal contributions made to the retirement system from all sources other than employee contributions in the immediate prior year. (Emphasis added)

Cause: Plan officials failed to establish adequate control procedures to ensure the accuracy of the data certified.

Effect: The data submitted on this certification form is used to calculate the reimbursement due the city for ad hoc postretirement adjustments granted pursuant to Chapter 4 of Act 147. The effect of the incorrect certification of pension data on the city's reimbursements is identified below:

Year	Reimbursement Claimed	Reimbursement Due	Excess Reimbursement
2010	$ 3,857	$ 3,608	$ 249
2012	$ 3,569	$ 3,121	$ 448
		Total	$ 697

Finding No. 1 – (Continued)

Recommendation: We recommend that the total excess reimbursement, in the amount of $697, be returned to the Commonwealth. A check in this amount, with interest compounded annually from the 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 calculated must be submitted along with the check.

We also again 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 64 to assist them in accurately reporting the required pension data.

Management's Response: City officials agreed with the finding without exception. City officials indicated they will take corrective actions to address the condition that was cited in the audit report.

Auditor's Conclusion: Compliance will be subject to verification through our next audit of the plan.

Finding No. 2 – Noncompliance With Prior Audit Recommendation - Pension Benefit Not Authorized By The Third Class City Code And The Plan's Governing Document

Condition: As disclosed in our prior audit report, a police officer had his pension benefit determined in excess of the provisions contained in the Third Class City Code and the plan's governing document through the inclusion of an additional two week payment made pursuant to the collective bargaining agreement between the city and its police officers. It should also be noted that the police officer's monthly pension benefit determination, which was based on his final monthly compensation, also included 120 hours of overtime pay and 16 hours of holiday pay as noted in the Comments section of this audit report.

Article VII, Section 2B of the collective bargaining agreement states, in part:

> Each employee shall have the opportunity, after giving written notice to the Police Chief and City Clerk, to either not work and receive paid vacation or may work a maximum of two (2) weeks of his/her vacation and be paid for such work at his/her regular straight time hourly rate in addition to his/her vacation.

Finding No. 2 – (Continued)

Criteria: Section 4303(a) of the Third Class City Code states, in part:

> The basis of the apportionment of the pension shall be determined by the rate of the monthly pay of the member at the date of injury, death, honorable discharge, vesting under section 4302.1 or retirement, or the highest average annual salary which the member received during any five years of service preceding injury, death, honorable discharge, vesting under section 4302.1 or retirement, whichever is the higher, and except as to service increments provided for in subsection (b) of this section, shall not in any case exceed in any year one-half the annual pay of such member computed at such monthly or average annual rate, whichever is the higher.

Furthermore, Section 4309 of the Third Class City Code states:

> As used in this subdivision, the term "salary" is defined as the fixed amount of compensation paid at regular, periodic intervals by the city to the member and from which pension contributions have been deducted.

The Department has concluded that lump sum payments for accumulated unused leave at retirement are not encompassed by "salary" or "rate of the monthly pay" as used in Section 4303(a) of the Third Class City Code, unless the unused leave was earned during the pension computation period. In addition, Section 1.12 of the pension plan's governing document, Ordinance No. 2 of 2008, states, in part:

> "Compensation" shall mean the total remuneration paid to an Employee by the Employer with respect to personal services rendered as an Employee. Amounts paid as lump sums for back-pay damage awards or settlements other than to the extent that such amounts are credited to periods of time when they would otherwise have accrued or been earned shall be excluded such that no amounts are credited in a manner which results in duplication of remunerations for any particular period of time.

Cause: Plan officials failed to establish adequate internal control procedures to ensure compliance with the prior audit recommendation.

Finding No. 2 – (Continued)

Effect: Due to the inclusion of the additional vacation pay, the plan is paying pension benefits to a retiree in excess of those authorized by the Third Class City Code and the plan's governing document. The retiree is receiving excess benefits of $685 per month, which totaled approximately $19,865 from the date of retirement through the date of this audit report (August 2011 to December 2013).

Providing unauthorized pension benefits could increase the plan's pension costs and reduce the amount of funds available for investment purposes or for the payment of authorized benefits or administrative expenses. Since the city received state aid based on unit value during and subsequent to the current audit period, it did not receive allocations attributable to the excess pension benefits provided. However, the increased costs to the pension plan as a result of the excess pension benefits could result in the receipt of excess state aid in the future and increase the municipal contributions necessary to fund the plan in accordance with Act 205 funding standards.

Recommendation: We again recommend that city officials consult with their solicitor to determine if the monthly pension benefit of the police officer who retired on July 29, 2011, should be adjusted in accordance with the Third Class City Code and the plan's governing document, and the retiree's monthly pension benefits be adjusted prospectively. To the extent that the city has already obligated itself to pay benefits in excess of those authorized by the Third Class City Code and the plan's governing documents, the excess benefit must be reflected in the Act 205 actuarial valuation report 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 excess benefit on the city's future state aid allocations and submit this information to the Department.

Furthermore, we again recommend that all future pension benefits be determined in accordance with the Third Class City Code and the provisions contained in the plan's governing document.

Management's Response: City officials agreed with the finding without exception. City officials indicated they will take corrective actions to address the condition that was cited in the audit report.

Auditor's Conclusion: Compliance will be evaluated during our next audit of the plan.

Finding No. 3 – Failure To Implement Act 44 Mandatory Distressed Provisions

Condition: 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:

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

Based in part on the plan's funded ratio of 58.4% as of January 1, 2009, the Public Employee Retirement Commission (PERC) issued a notification in 2010 that the city was in Level II moderate distress status. Based in part on the plan's funded ratio of 60.1% as of January 1, 2011, PERC issued a notification in 2012 that the city is again currently in Level II moderate distress status.

Included with the determination notices, PERC sent the municipality the Act 205 Recovery Program Election Form outlining the mandatory remedies that must be implemented and the voluntary remedies that the municipality could elect to implement. This form was required to be signed by the plan's chief administrative officer and returned to PERC; however, the city never returned the 2012 election form to PERC.

Criteria: Act 205, amended by Act 44, at Section 605(a), states:

> Recovery program level II.
>
> (a) Mandatory remedies. Any municipality to which level II of the recovery program applies shall utilize the following remedies:
>
> (1) The aggregation of trust funds pursuant to section 607(b).
>
> (2) The submission of a plan for administrative improvement pursuant to section 607(i).

Finding No. 3 – (Continued)

Cause: Municipal officials failed to establish adequate internal control procedures to ensure the mandatory distress remedies have been implemented.

Effect: The municipality is not in compliance with the Act 44 mandatory distress remedy provisions applicable to Level II which are designed to improve the funding status and administrative efficiency of its pension plans.

Recommendation: We recommend that municipal officials contact PERC for guidance in the implementation of the mandatory distress remedies applicable to Level II pursuant to Act 44 of 2009.

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

Finding No. 4 – Custodial Account Transactions Not Adequately Monitored By The Municipality

Condition: Plan officials did not provide evidence that the plan's custodial account is adequately monitored to ensure the propriety of the account transactions.

Criteria: Assets held in a pension account for the purpose of plan management are to be governed by the terms and provisions of the agreement provided that they are within the parameters of all prevailing pension legislation. Although a municipality may contract with a trustee to administer the financial management of the plan, the fiduciary responsibility for the plan remains with the municipality.

Finding No. 4 – (Continued)

Cause: Plan officials were not aware of their fiduciary responsibility to monitor the pension account. Furthermore, plan officials have not prepared management guidelines which describe the duties and responsibilities of municipal and plan officials to ensure an effective transition of duties.

Effect: Inadequate monitoring of the custodial account lead to undetected errors in account transactions as well as deficiencies in authorizing and implementing pension plan policies and procedures. In October of 2012, a disbursement for police pension payments in the amount of $48,560 was made from the firemen's pension plan and a disbursement of $14,911 for firemen's pension payments was made from the police pension plan.

Recommendation: We recommend that the municipality examine the financial transactions of the custodial account to ensure the accuracy and propriety of the transactions. The minimum steps that should be applied by a municipality to adequately monitor the custodial account are:

- Verify the mathematical accuracy of the account statements;
- Reconcile the Commonwealth, municipal and members' contributions shown on the account statements to the municipality's records;
- Review investment income for accuracy and reasonableness;
- Reconcile any large or material receipt, other than contributions, shown on the account statements to the municipality's records;
- Determine if investments are in accordance with applicable laws, regulations and policies. Reconcile investment income to the related investments;
- Review custodial statements at pension board meetings;
- Reconcile pension payments shown on the account statements to the municipality's records; and
- Reconcile any large or material disbursement, shown on the account statements to the municipality's records.

Furthermore, we recommend that $33,649 be transferred from the police pension plan to the firemen's pension plan to reimburse the firemen's plan for the benefit overpayments made in 2012.

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

Finding No. 5 – Failure To File Certification Form AG 64 Resulting In An Underpayment Of Reimbursement For Special 2002 Ad Hoc Postretirement Adjustment

Condition: The city failed to file Certification Form AG 64 for 2013, resulting in the city not receiving its reimbursement for the Special Ad Hoc Postretirement Adjustments paid in 2012.

Criteria: Section 502.1(a)(2) of Act 147 states, in part:

> The determination of the reimbursable amount of the amortization contribution requirement attributable to the special ad hoc postretirement adjustment under Chapter 4 in any year shall be calculated as the amortization contribution requirement attributable to the special ad hoc postretirement adjustments under Chapter 4 and reflected in the determination of the financial requirements of the pension plan under Chapter 3 of the Municipal Pension Plan Funding Standard and Recovery Act for the immediate prior year less the product of that amortization contribution requirement multiplied by the ratio of the amount of general municipal pension system state aid allocated to the retirement system in the immediate prior year to the total amount of municipal contributions made to the retirement system from all sources other than employee contributions in the immediate prior year.

In addition, Section 502.1(b) of Act 147 states:

> **Limitation of eligibility** –
> (1) The Commonwealth shall not reimburse any municipality for a special ad hoc adjustment paid under Chapter 4 if the information required under section 901(a)(2) either was not certified to the Auditor General or was certified after April 1 of the year the certification was due.
> (2) The Commonwealth shall not reimburse a municipality for the reimbursable amount of the amortization contribution requirement attributable to the special ad hoc postretirement adjustment under Chapter 4 if the municipality fails to submit a complete certification of the reimbursable amount of the amortization contribution requirement determined under subsection (a) to the Auditor General before April 1 of the year in which the reimbursement is payable.

Consequently, the city is not eligible to receive a reimbursement in 2013 since all data must be certified accurately prior to April 1 of the year in which the reimbursement is payable.

Finding No. 5 – (Continued)

Cause: Plan officials failed to establish adequate internal control procedures to ensure the Certification Form AG 64 was filed timely.

Effect: The data submitted on this certification form is used to calculate the reimbursement due the city for ad hoc postretirement adjustments granted pursuant to Chapter 4 of Act 147. Had the city filed a timely and accurate 2013 Certification Form AG 64 the city would have received a special 2002 ad hoc postretirement reimbursement in the amount of $3,336.

In addition, the eligible reimbursement was not available to pay operating expenses or for investment.

Recommendation: We recommend that in the future, city officials establish adequate internal control procedures to ensure the Certification Form AG 64 is filed timely and accurately.

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

CITY OF ALIQUIPPA POLICE 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, 2007, is as follows:

	(1)	(2)	(3)	(4)	(5)	(6)
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)	Covered Payroll (c)	Unfunded (Assets in Excess of) Actuarial Accrued Liability as a % of Payroll [(b-a)/(c)]
01-01-07	$ 4,931,029	$ 6,586,148	$ 1,655,119	74.9%	$ 849,921	194.7%
01-01-09	4,127,592	7,069,390	2,941,798	58.4%	771,101	381.5%
01-01-11	4,706,640	7,836,378	3,129,738	60.1%	709,991	440.8%

Note: The market values of the plan's assets at 01-01-09 and 01-01-11 have been adjusted to reflect a 4-year smoothing of gains and/or losses subject to a corridor between 90 to 110 percent of the market value of assets. 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.

CITY OF ALIQUIPPA POLICE 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.

Trends in unfunded (assets in excess of) actuarial accrued liability and annual covered payroll are both affected by inflation. Expressing the unfunded (assets in excess of) actuarial accrued liability as a percentage of annual covered payroll (Column 6) approximately adjusts for the effects of inflation and aids analysis of the plan's progress made in accumulating sufficient assets to pay benefits when due. Generally, where there is an unfunded actuarial accrued liability, the smaller this percentage, the stronger the plan. When assets are in excess of the actuarial accrued liability, the higher the bracketed percentage, the stronger the plan.

CITY OF ALIQUIPPA POLICE PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

SCHEDULE OF CONTRIBUTIONS FROM EMPLOYER
AND OTHER CONTRIBUTING ENTITIES

Year Ended December 31	Annual Required Contribution	Percentage Contributed
2007	$ 247,783	154.2%
2008	265,141	192.7%
2009	258,867	183.9%
2010	251,627	140.6%
2011	321,331	169.8%
2012	401,130	127.8%

CITY OF ALIQUIPPA POLICE PENSION PLAN
SUPPLEMENTARY INFORMATION
NOTES TO SUPPLEMENTARY SCHEDULES
(UNAUDITED)

The information presented in the required 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, 2011
Actuarial cost method	Entry age normal
Amortization method	Level dollar, closed
Remaining amortization period	14 years
Asset valuation method	Fair value, 4-year smoothing subject to a corridor between 90-110% of the market value of assets.
Actuarial assumptions:	
Investment rate of return	7.5%
Projected salary increases	5.0%

CITY OF ALIQUIPPA POLICE PENSION PLAN
COMMENTS

As previously noted in this audit report, the City of Aliquippa Police Pension Plan is governed by local ordinances adopted pursuant to Act 317, the Third Class City Code. With regard to the determination of pension benefits for police officers, Section 4303 of the Third Class City Code states:

> Allowances and Service Increments. (a) Payments for allowances shall not be a charge on any other fund in the treasury of the city or under its control save the police pension fund herein provided for. The basis of the apportionment of the pension shall be determined <u>by the rate of the monthly pay</u> of the member at the date of injury, death, honorable discharge, vesting under section 4302.1 or retirement, or the highest average annual salary which the member received during any five years of service preceding injury, death, honorable discharge, vesting under section 4302.1 or retirement, whichever is the higher, and except as to service increments provided for in subsection (b) of this section, shall not in any case exceed in any year one-half the annual pay of such member computed at such monthly or average annual rate, whichever is the higher. (Emphasis added)

Although the Code does not contain a definition for the term "pay", at Section 4309, the Code defines the term salary as follows:

> Definitions. As used in this subdivision, the term "salary" is defined as the fixed amount of compensation paid at regular, periodic intervals by the city to the member and from which pension contributions have been deducted.

The city's practice has been to calculate the police officers' pension benefits based on the amount of the retiree's final month's pay. This includes regular monthly pay plus overtime, holiday pay and additional 2 week leave payments.

During the current audit period, a police officer retired on a non-disability normal retirement pension. During the final month of his employment, in addition to the regular hours worked, the police officer accumulated 120 hours of overtime, 16 hours of holiday pay and $1,826 of an additional 2 weeks of vacation pay.

Through the inclusion of large amounts of additional compensation in the police officers' final monthly earnings, it was noted by the plan consultant that the compensation used for the pension benefit determination was $3,400 greater than 1/12 of the police officer's 2010 annual compensation.

CITY OF ALIQUIPPA POLICE PENSION PLAN
COMMENTS

We encourage city officials to review the methodology they use to calculate pension benefits for its police officers. The city's practice of allowing police officers the opportunity to accumulate large amounts of overtime and other forms of compensation during their last month of employment and including that compensation in the calculation of pension benefits has created apparent windfalls for retirees, significantly increased the required municipal contributions to the pension funds, thwarted actuarial projections, and jeopardized the fiscal soundness of the pension plans.

CITY OF ALIQUIPPA POLICE PENSION PLAN
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Tom Corbett
Governor
Commonwealth of Pennsylvania

City of Aliquippa Police Pension Plan
Beaver County
581 Franklin Avenue
Aliquippa, PA 15001

The Honorable Dwan B. Walker	Mayor
Mr. Samuel L. Gill	City Administrator
Ms. Cheryl McFarland	Finance Director

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