

LIMITED PROCEDURES ENGAGEMENT

Franklin Township Non-Uniformed Pension Plan Carbon County, Pennsylvania For the Period January 1, 2016 to December 31, 2018

February 2020



Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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EUGENE A. DePASQUALE
AUDITOR GENERAL

Board of Township Supervisors
Franklin Township
Carbon County
Lehighton, PA 18235

We conducted a Limited Procedures Engagement (LPE) of the Franklin Township Non-Uniformed Pension Plan for the period January 1, 2016 to December 31, 2018 to determine its compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies. We also evaluated compliance with some requirements subsequent to that period when possible. The LPE was conducted pursuant to authority derived from Section 402(j) of the Municipal Pension Plan Funding Standard and Recovery Act (P.L. 1005, No. 205, as amended, 53 P.S. § 895.101 et seq.) but was not conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States. 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. We believe that the evidence obtained provides a reasonable basis to support our LPE results.

Our LPE was limited to determining the following:

- 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 engagement period.
- 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.
- Whether annual employee contributions were required during the engagement period and, if so, were calculated, deducted, and deposited into the pension plan in accordance with the plan's governing document and applicable laws and regulations by testing total members' contributions on an annual basis using the rates obtained from the plan's governing document in effect for all years within the engagement period and examining documents evidencing the deposit of these employee contributions into the pension plan.

- Whether retirement benefits calculated for plan members who retired during the engagement period represent payments to all (and only) 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 retired individuals and comparing these amounts to supporting documentation evidencing amounts determined and actually paid to recipients.
- Whether the January 1, 2015 and January 1, 2017 actuarial valuation reports were prepared and submitted by March 31, 2016 and 2018, 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.

Based on the results of our procedures performed during our LPE, nothing came to our attention indicating that the Franklin Township Non-Uniformed Pension Plan was not being administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies, except as noted in the following finding further discussed later in this report:

Finding - Incorrect Data On Certification Form AG 385 Resulting In An Underpayment Of State Aid

Our determination to perform a LPE for this engagement period does not preclude the Department from conducting an audit in accordance with *Government Auditing Standards* of the pension plan in subsequent periods. The township should continue to maintain documentation related to this pension plan.

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.

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

February 4, 2020



EUGENE A. DEPASQUALE
Auditor General

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FRANKLIN TOWNSHIP NON-UNIFORMED PENSION PLAN
FINDING AND RECOMMENDATION

Finding - Incorrect Data On Certification Form AG 385 Resulting In An Underpayment Of State Aid

Condition: The township failed to certify 1 eligible non-uniformed employees (1 unit) and understated payroll by \$21,879 on the Certification Form AG 385 filed in 2019. The data contained on this certification form is based on prior calendar year information.

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

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

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 township's state aid allocation was based on unit value, the township received an underpayment of state aid of \$5,120 as identified below:

<u>Units</u> <u>Understated</u>	<u>Unit</u> <u>Value</u>	<u>State Aid</u> <u>Underpayment</u>
1	\$5,120	\$ 5,120

Although the additional state aid will be allocated to the township, the full amount of the 2019 state aid allocation was not available to be deposited timely and therefore was not available to pay operating expenses or for investment.

Recommendation: We recommend that in the future, plan officials establish adequate internal control procedures, such as having at least two 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.

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

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

FRANKLIN TOWNSHIP NON-UNIFORMED PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

The supplementary information contained on Pages 2 through 4 reflects the implementation of GASB Statement No. 67, *Financial Reporting for Pension Plans*. The objective of this statement is to improve financial reporting by state and local governmental pension plans.

SCHEDULE OF CHANGES IN THE NET PENSION
LIABILITY AND RELATED RATIOS
FOR THE YEARS ENDED DECEMBER 31, 2014, 2015, 2016, 2017, AND 2018

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Total Pension Liability					
Service cost	\$ 35,758	\$ 31,923	\$ 34,238	\$ 38,482	\$ 38,012
Interest	91,450	100,094	102,357	100,749	102,450
Changes of benefits	-	-	-	-	14,744
Difference between expected and actual experience	114,990	-	(24,889)	-	127,923
Changes of assumptions	-	(3,769)	42,959	-	-
Benefit payments, including refunds of member contributions	(82,526)	(79,819)	(99,279)	(102,544)	(110,262)
Net Change in Total Pension Liability	<u>159,672</u>	<u>48,429</u>	<u>55,386</u>	<u>36,687</u>	<u>172,867</u>
Total Pension Liability - Beginning	<u>1,667,676</u>	<u>1,827,348</u>	<u>1,875,777</u>	<u>1,931,163</u>	<u>1,967,850</u>
Total Pension Liability - Ending (a)	<u>\$ 1,827,348</u>	<u>\$ 1,875,777</u>	<u>\$ 1,931,163</u>	<u>\$ 1,967,850</u>	<u>\$ 2,140,717</u>
Plan Fiduciary Net Position					
Contributions - employer	\$ 42,031	\$ 33,924	\$ 31,855	\$ 46,943	\$ 48,140
Contributions - PMRS assessment	-	280	260	280	280
Contributions - member	11,952	11,619	13,178	14,103	13,930
PMRS investment income	88,523	92,458	91,151	94,604	97,592
Market value investment income	8,293	(81,785)	56,397	212,325	(162,189)
Benefit payments, including refunds of member contributions	(82,526)	(79,819)	(99,279)	(102,544)	(110,262)
Administrative expense	(240)	(280)	(260)	(280)	(280)
Additional administrative expense	(3,395)	(3,854)	(4,466)	(4,351)	(4,355)
Net Change in Plan Fiduciary Net Position	<u>64,638</u>	<u>(27,457)</u>	<u>88,836</u>	<u>261,080</u>	<u>(117,144)</u>
Plan Fiduciary Net Position - Beginning	<u>1,618,963</u>	<u>1,683,601</u>	<u>1,656,144</u>	<u>1,744,980</u>	<u>2,006,060</u>
Plan Fiduciary Net Position - Ending (b)	<u>\$ 1,683,601</u>	<u>\$ 1,656,144</u>	<u>\$ 1,744,980</u>	<u>\$ 2,006,060</u>	<u>\$ 1,888,916</u>
Net Pension Liability - Ending (a-b)	<u>\$ 143,747</u>	<u>\$ 219,633</u>	<u>\$ 186,183</u>	<u>\$ (38,210)</u>	<u>\$ 251,801</u>
Plan Fiduciary Net Position as a Percentage of the Total Pension Liability	92.13%	88.29%	90.36%	101.94%	88.24%
Estimated Covered Employee Payroll	\$ 325,668	\$ 290,296	\$ 329,461	\$ 352,564	\$ 348,258
Net Pension Liability as a Percentage of Covered Employee Payroll	44.14%	75.66%	56.51%	(10.84%)	72.30%

FRANKLIN TOWNSHIP NON-UNIFORMED PENSION PLAN
 SUPPLEMENTARY INFORMATION
 (UNAUDITED)

Sensitivity Of The Net Pension Liability To Changes In The Discount Rate

The following presents the net pension liability of the township as of December 31, 2014 and 2015, calculated using the discount rate of 5.50%, as well as what the township's net pension liability would be if it were calculated using a discount rate that is 1 percentage-point lower or 1 percentage-point higher than the current rate:

	<u>1% Decrease (4.50%)</u>	<u>Current Discount Rate (5.50%)</u>	<u>1% Increase (6.50%)</u>
Net Pension Liability - 12/31/14	\$ 316,130	\$ 143,747	\$ (6,251)
Net Pension Liability - 12/31/15	\$ 394,471	\$ 219,633	\$ 67,774

In addition, the following presents the net pension liability of the township as of December 31, 2016, 2017, and 2018, calculated using the discount rate of 5.25%, as well as what the township's net pension liability would be if it were calculated using a discount rate that is 1 percentage-point lower or 1 percentage-point higher than the current rate:

	<u>1% Decrease (4.25%)</u>	<u>Current Discount Rate (5.25%)</u>	<u>1% Increase (6.25%)</u>
Net Pension Liability - 12/31/16	\$ 373,722	\$ 186,183	\$ 22,823
Net Pension Liability - 12/31/17	\$ 152,892	\$ (38,210)	\$ (204,673)
Net Pension Liability - 12/31/18	\$ 453,743	\$ 251,801	\$ 75,735

FRANKLIN TOWNSHIP NON-UNIFORMED PENSION PLAN
 SUPPLEMENTARY INFORMATION
 (UNAUDITED)

SCHEDULE OF CONTRIBUTIONS

Year Ended December 31	Actuarially Determined Contribution	Actual Contributions	Contribution Deficiency (Excess)	Covered- Employee Payroll	Contributions as a Percentage of Covered- Employee Payroll
2014	\$ 42,011	\$ 42,031	\$ (20)	\$ 325,668	12.91%
2015	34,184	34,204	(20)	290,296	11.78%
2016	32,115	32,115	-	329,461	9.75%
2017	47,223	47,223	-	352,564	13.39%
2018	48,420	48,420	-	348,258	13.90%

FRANKLIN TOWNSHIP NON-UNIFORMED 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, 2013, 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)
01-01-13	\$ 1,556,178	\$ 1,593,527	\$ 37,349	97.7%
01-01-15	1,724,720	1,827,348	102,628	94.4%
01-01-17	1,884,483	1,931,163	46,680	97.6%

FRANKLIN TOWNSHIP NON-UNIFORMED 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.

FRANKLIN TOWNSHIP NON-UNIFORMED 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, 2017
Actuarial cost method	Entry age normal
Amortization method	Level dollar
Remaining amortization period	3 years
Asset valuation method	The Actuarial Value of Assets equals the plan's member, municipal, DROP (if applicable) reserve accounts plus the retiree actuarial liability. This asset smoothing is based on the unique legislative structure of PMRS and the administrative rules adopted by the PMRS Board in conjunction with Pennsylvania Municipal Retirement Law, all of which are subject to comply with the Actuarial Standards of Practice No. 44, Selection and Use of Asset Valuation Methods when defining the actuarial Value of Assets.
Actuarial assumptions:	
Investment rate of return	5.25%, compounded annually, net of investment and administration expenses.
Salary scale	Total rate (including inflation) (e.g. age 25 – 7.05%; age 35 – 4.55%; age 45 – 3.97%; age 55 – 3.44%; age 65 – 2.80%).
Cost-of-living adjustments	2.8% per year, subject to plan limitations.

FRANKLIN TOWNSHIP NON-UNIFORMED PENSION PLAN
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Tom W. Wolf
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Ms. Charity Rosenberry, CPA
Pennsylvania Municipal Retirement System

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