

COMPLIANCE AUDIT

Silver Spring Township Non-Uniformed Employees Pension Plan Cumberland County, Pennsylvania For the Period January 1, 2015 to December 31, 2018

May 2019



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
Silver Spring Township
Cumberland County
Mechanicsburg, PA 17050

We have conducted a compliance audit of the Silver Spring Township Non-Uniformed Employees Pension Plan for the period January 1, 2015 to December 31, 2018. 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 the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our conclusions based on our audit objective.

The objective of the audit was 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 objective identified above. 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 that there were no employee contributions required by the plan's governing document and applicable laws and regulations for the years covered by our audit period.
- We determined whether retirement benefits calculated for the sole plan member who retired during the current audit 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 benefits due to the retired individual and comparing these amounts to supporting documentation evidencing amounts determined and actually paid to the recipient. We also determined whether retirement benefits calculated for the lone plan member who elected to vest during the current audit period represent payments to all (and only) those entitled to receive them and were properly determined in accordance with the plan's governing document, applicable laws and regulations by recalculating the amount of the pension benefits due to the retired individual and comparing these amounts to supporting documentation evidencing amounts determined.
- We determined 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.

Silver Spring Township contracted with an independent certified public accounting firm for annual audits of its basic financial statements for the years ended December 31, 2015, 2016 and 2017, which are available at the township's offices. Those financial statements were not audited by us and, accordingly, we express no opinion or other form of assurance on them.

Township officials are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the Silver Spring Township Non-Uniformed Employees 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 township's internal controls as they relate to the township's compliance with those requirements and that we considered to be significant within the context of our audit objective, 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 objective.

The results of our procedures indicated that, in all significant respects, the Silver Spring Township Non-Uniformed Employees Pension Plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies.

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 Silver Spring Township and, where appropriate, their responses have been included in the report. We would like to thank township officials for the cooperation extended to us during the conduct of the audit.

May 8, 2019

A handwritten signature in black ink, appearing to read "Eugene A. DePasquale". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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 Silver Spring Township Non-Uniformed Employees Pension Plan is also governed by implementing regulations adopted by the former Public Employee Retirement Commission published at Title 16, Part IV of the Pennsylvania Code and applicable provisions of various other state statutes.

The Silver Spring Township Non-Uniformed Employees Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of Ordinance 87-9, as amended. The plan was established January 1, 1987. Active members are not required to contribute to the plan. As of December 31, 2018, the plan had 42 active members, 5 terminated members eligible for vested benefits in the future, and 8 retirees receiving pension benefits from the plan.

BACKGROUND – (Continued)

As of December 31, 2018, selected plan benefit provisions are as follows:

Eligibility Requirements:

Normal Retirement Age 65 and 10 years of service.

Early Retirement Age 60 and 10 years of service.

Vesting 10 years of service.

Retirement Benefit:

Benefit equals 1.0% of average monthly compensation based on 5 highest consecutive calendar years of last 10 years of employment multiplied by years of service.

Survivor Benefit:

If retired or eligible for early retirement – a monthly benefit equal to 50% of benefit to surviving spouse or child under age 18.

Disability Benefit:

After 10 years of service – benefit accrued to date of disability.

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES PENSION PLAN
STATUS OF PRIOR FINDING

Compliance With Prior Audit Recommendation

Silver Spring Township has complied with the prior audit recommendation concerning the following:

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

During the current audit period, municipal officials complied with the instructions that accompanied Certification Forms AG 385 and accurately reported the required pension data.

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

The supplementary information contained on Pages 4 through 7 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 AND 2015

	<u>2014</u>	<u>2015</u>
Total Pension Liability		
Service cost	\$ 98,440	\$ 99,755
Interest	129,227	129,030
Difference between expected and actual experience	-	(175,872)
Benefit payments, including refunds of member contributions	<u>(56,343)</u>	<u>(55,513)</u>
Net Change in Total Pension Liability	171,324	(2,600)
Total Pension Liability – Beginning	<u>1,775,835</u>	<u>1,947,159</u>
Total Pension Liability – Ending (a)	<u><u>\$ 1,947,159</u></u>	<u><u>\$ 1,944,559</u></u>
Plan Fiduciary Net Position		
Contributions – employer	\$ 107,055	\$ 127,245
Net investment income	84,498	(22,480)
Benefit payments, including refunds of member contributions	<u>(56,343)</u>	<u>(55,513)</u>
Administrative expense	<u>(6,026)</u>	<u>-</u>
Net Change in Plan Fiduciary Net Position	129,184	49,252
Plan Fiduciary Net Position – Beginning	<u>1,732,443</u>	<u>1,861,627</u>
Plan Fiduciary Net Position – Ending (b)	<u><u>\$ 1,861,627</u></u>	<u><u>\$ 1,910,879</u></u>
Net Pension Liability – Ending (a-b)	<u><u>\$ 85,532</u></u>	<u><u>\$ 33,680</u></u>
Plan Fiduciary Net Position as a Percentage of the Total Pension Liability	95.61%	98.27%
Estimated Covered Employee Payroll	\$ 1,498,306	\$ 1,596,516
Net Pension Liability as a Percentage of Covered Employee Payroll	5.71%	2.11%

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

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

	<u>2016</u>	<u>2017</u>
Total Pension Liability		
Service cost	\$ 104,743	\$ 142,525
Interest	141,104	160,218
Difference between expected and actual experience	-	(43,930)
Changes of assumptions	-	102,431
Benefit payments, including refunds of member contributions	(67,080)	(71,049)
Net Change in Total Pension Liability	<u>178,767</u>	<u>290,195</u>
Total Pension Liability – Beginning	1,944,559	2,123,326
Total Pension Liability – Ending (a)	<u>\$ 2,123,326</u>	<u>\$ 2,413,521</u>
Plan Fiduciary Net Position		
Contributions – employer	\$ 135,644	\$ 157,736
Net investment income	83,160	254,249
Benefit payments, including refunds of member contributions	(67,080)	(71,049)
Administrative expense	(12,314)	(4,669)
Net Change in Plan Fiduciary Net Position	<u>139,410</u>	<u>336,267</u>
Plan Fiduciary Net Position – Beginning	1,910,879	2,050,289
Plan Fiduciary Net Position – Ending (b)	<u>\$ 2,050,289</u>	<u>\$ 2,386,556</u>
Net Pension Liability – Ending (a-b)	<u>\$ 73,037</u>	<u>\$ 26,965</u>
Plan Fiduciary Net Position as a Percentage of the Total Pension Liability	96.56%	98.88%
Estimated Covered Employee Payroll	\$ 2,053,962	\$ 2,382,012
Net Pension Liability as a Percentage of Covered Employee Payroll	3.56%	1.13%

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES 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, 2015, 2016, and 2017, calculated using the discount rate of 7.0%, 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:

	1% Decrease (6.0%)	Current Discount Rate (7.0%)	1% Increase (8.0%)
Net Pension Liability – 12/31/14	\$ 350,130	\$ 85,532	\$ (137,153)
Net Pension Liability – 12/31/15	\$ 302,921	\$ 33,680	\$ (192,443)
Net Pension Liability – 12/31/16	\$ 364,836	\$ 73,037	\$ (172,212)
Net Pension Liability – 12/31/17	\$ 370,980	\$ 26,965	\$ (261,202)

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
2009	\$ 60,425	\$ 60,426	\$ (1)	\$1,355,616	4.46%
2010	62,796	62,796	-	1,355,616	4.63%
2011	94,029	94,029	-	1,506,208	6.24%
2012	111,036	111,036	-	1,520,546	7.30%
2013	101,538	101,538	-	1,465,544	6.93%
2014	107,055	107,055	-	1,498,306	7.15%
2015	127,245	127,245	-	1,596,516	7.97%
2016	135,644	135,644	-	2,053,962	6.60%
2017	157,736	157,736	-	2,382,012	6.62%
2018	177,895	177,895	-		

* Due to the timing of this audit, covered-employee payroll for 2018 was not provided in this schedule.

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

SCHEDULE OF INVESTMENT RETURNS

Annual Money-Weighted Rate of Return, Net of Investment Expense:

2017	13.30%
2016	5.40%
2015	(0.20)%
2014	5.70%

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES 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	\$ 1,509,403	\$ 1,621,576	\$ 112,173	93.1%
01-01-15	1,822,056	1,771,287	(50,769)	102.9%
01-01-17	2,164,060	2,181,827	17,767	99.2%

Note: The market values of the plan's assets at 01-01-13, 01-01-15, and 01-01-17 have been adjusted to reflect the smoothing of gains and/or losses over a five-year averaging period, which will be limited to a maximum of 120 percent and a minimum of 80 percent of the fair 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.

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES 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.

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES 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	15 years
Asset valuation method	5-year smoothing, subject to a corridor between 80-120% of the market value of assets.
Actuarial assumptions:	
Investment rate of return	7.0%
Projected salary increases	5.0%

SILVER SPRING TOWNSHIP NON-UNIFORMED EMPLOYEES PENSION PLAN
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Tom W. Wolf
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