

COMPLIANCE AUDIT

Bristol Township Police Pension Plan Bucks County, Pennsylvania For the Period January 1, 2015 to December 31, 2017

January 2019



Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General



Commonwealth of Pennsylvania
Department of the Auditor General
Harrisburg, PA 17120-0018
Facebook: Pennsylvania Auditor General
Twitter: @PAAuditorGen
www.PaAuditor.gov

EUGENE A. DePASQUALE
AUDITOR GENERAL

Township Council
Bristol Township
Bucks County
Bristol, PA 19007

We have conducted a compliance audit of the Bristol Township Police Pension Plan for the period January 1, 2015 to December 31, 2017. 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 conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our 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 finding 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 finding 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 total 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 8 of the 16 plan members¹ who retired during the current audit period, and through the completion of our fieldwork procedures, 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 individuals and comparing these amounts to supporting documentation evidencing amounts determined and actually paid to the recipients. We also determined whether retirement benefits calculated for the 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, 2013, January 1, 2015 and January 1, 2017 actuarial valuation reports were prepared and submitted by March 31, 2014, 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.
- 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 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

¹ We selected plan members randomly from the population of plan members who retired during the current audit period in order to obtain a representative selection for the purpose of our testing to achieve the audit objective. While representative selection is a required factor of audit sampling methodologies, audit sampling methodology was not applied to achieve this test objective; accordingly, the results of this audit procedure are not, and should not be, projected to the population.

- We determined whether provisions of the Deferred Retirement Option Plan (DROP) were in accordance with the provisions of Act 205 by examining provisions stated in the plan's governing documents.

Bristol Township contracted with an independent certified public accounting firm for annual audits of its basic financial statements 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 Bristol Township 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 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 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 Bristol Township Police 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 Bristol Township and, where appropriate, their responses have been included in the report.

January 16, 2019



EUGENE A. DEPASQUALE
Auditor General

CONTENTS

	<u>Page</u>
Background.....	1
Status of Prior Finding.....	3
Supplementary Information	4
Report Distribution List	11

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 Bristol Township Police 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 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 600 - Police Pension Fund Act, Act of May 29, 1956 (P.L. 1804, No. 600), as amended, 53 P.S. § 767 et seq.

The Bristol Township Police Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of Ordinance No. 2010-02, as amended, adopted pursuant to Act 600. The plan is also affected by the provisions of collective bargaining agreements between the township and its police officers. The plan was established January 1, 1958. Active members are required to contribute 5 percent of wages to the plan. As of December 31, 2017, the plan had 50 active members, 3 terminated members eligible for vested benefits in the future, and 80 retirees receiving pension benefits from the plan.

BACKGROUND – (Continued)

As of December 31, 2017, selected plan benefit provisions are as follows:

Eligibility Requirements:

Normal Retirement	If hired prior to 1/1/98, Age 50 and 25 years of service or Age 60 and 20 years of service
	If hired after 1/1/98, Age 53 and 25 years of service or Age 60 and 20 years of service.
	If hired after 1/1/01, Age 60 and 20 years of service is eliminated.
Early Retirement	20 years of service
Vesting	100% after 12 years of service

Retirement Benefit:

Benefit equals 50% of final 36 months average salary, plus a service increment of \$20 per month for each year of service in excess of 25 years, up to a maximum of \$100 per month.

Survivor Benefit:

Before Retirement Eligibility	Refund of member contributions plus interest.
After Retirement Eligibility	A monthly benefit equal to 50% of the pension the member was receiving or was entitled to receive on the day of the member's death.

Service Related Disability Benefit:

If hired before July 8, 2013, benefit equals 100% of the member's salary at the time the disability was incurred, offset by Social Security disability benefits received for the same injury.

If hired after July 8, 2013, benefit equals 75% of the member's salary at the time the disability was incurred, offset by Social Security disability benefits received for the same injury.

BRISTOL TOWNSHIP POLICE PENSION PLAN
STATUS OF PRIOR FINDING

Compliance With Prior Audit Recommendation

Bristol Township has complied with the prior audit recommendation concerning the following:

- Inconsistent Pension Benefits

Municipal officials enacted Ordinance No. 2015-5 to eliminate inconsistent pension benefits between the plan's governing document and the collective bargaining agreement.

BRISTOL TOWNSHIP POLICE PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

The supplementary information contained on Pages 4 through 6 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	\$ 1,075,572	\$ 746,492
Interest	4,262,456	4,268,577
Changes for experience	-	(674,370)
Changes of assumptions	-	(1,284,341)
Benefit payments, including refunds of member contributions	(2,963,530)	(2,983,918)
Net Change in Total Pension Liability	<u>2,374,498</u>	<u>72,440</u>
Total Pension Liability – Beginning	<u>53,686,887</u>	<u>56,061,385</u>
Total Pension Liability – Ending (a)	<u><u>\$ 56,061,385</u></u>	<u><u>\$ 56,133,825</u></u>
 Plan Fiduciary Net Position		
Contributions – employer	\$ 1,112,391	\$ 1,764,421
Contributions – state aid	627,271	454,817
Contributions – member	297,595	295,752
Net investment income	2,677,685	319,618
Benefit payments, including refunds of member contributions	(2,963,530)	(2,983,918)
Administrative expense	(5,000)	(12,700)
Net Change in Plan Fiduciary Net Position	<u>1,746,412</u>	<u>(162,010)</u>
Plan Fiduciary Net Position – Beginning	<u>44,749,873</u>	<u>46,496,285</u>
Plan Fiduciary Net Position – Ending (b)	<u><u>\$ 46,496,285</u></u>	<u><u>\$ 46,334,275</u></u>
 Net Pension Liability – Ending (a-b)	<u><u>\$ 9,565,100</u></u>	<u><u>\$ 9,799,550</u></u>
 Plan Fiduciary Net Position as a Percentage of the Total Pension Liability	82.94%	82.54%
 Estimated Covered Employee Payroll	\$ 6,124,324	\$ 6,128,720
 Net Pension Liability as a Percentage of Covered Employee Payroll	156.18%	159.90%

BRISTOL TOWNSHIP POLICE 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	\$ 791,282	\$ 872,302
Interest	4,434,888	4,522,550
Changes for experience	-	(1,483,656)
Changes of assumptions	-	267,451
Benefit payments, including refunds of member contributions	<u>(2,978,013)</u>	<u>(3,012,418)</u>
Net Change in Total Pension Liability	2,248,157	1,166,229
Total Pension Liability – Beginning	<u>56,133,825</u>	<u>58,381,982</u>
Total Pension Liability – Ending (a)	<u>\$ 58,381,982</u>	<u>\$ 59,548,211</u>
Plan Fiduciary Net Position		
Contributions – employer	\$ 1,042,727	\$ 850,690
Contributions – state aid	638,698	660,708
Contributions – member	290,882	286,417
Net investment income	3,350,779	7,759,872
Benefit payments, including refunds of member contributions	<u>(2,978,013)</u>	<u>(3,012,418)</u>
Administrative expense	<u>(11,400)</u>	<u>(5,400)</u>
Net Change in Plan Fiduciary Net Position	2,333,673	6,539,869
Plan Fiduciary Net Position – Beginning	<u>46,334,275</u>	<u>48,667,948</u>
Plan Fiduciary Net Position – Ending (b)	<u>\$ 48,667,948</u>	<u>\$ 55,207,817</u>
Net Pension Liability – Ending (a-b)	<u>\$ 9,714,034</u>	<u>\$ 4,340,394</u>
Plan Fiduciary Net Position as a Percentage of the Total Pension Liability	83.36%	92.71%
Estimated Covered Employee Payroll	\$ 5,444,324	\$ 5,680,410
Net Pension Liability as a Percentage of Covered Employee Payroll	178.42%	76.41%

BRISTOL TOWNSHIP POLICE 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, 2015, 2016 and 2017, calculated using the discount rate of 8.0%, 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 (7.0%)	Current Discount Rate (8.0%)	1% Increase (9.0%)
Net Pension Liability – 12/31/15	\$ 15,823,251	\$ 9,799,550	\$ 4,699,645
Net Pension Liability – 12/31/16	15,821,842	9,714,034	4,538,896
Net Pension Liability – 12/31/17	10,628,542	4,340,394	(990,009)

SCHEDULE OF INVESTMENT RETURNS

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

2017	15.94%
2016	7.23%
2015	0.70%
2014	6.11%

BRISTOL TOWNSHIP 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, 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	\$ 43,737,226	\$ 51,565,991	\$ 7,828,765	84.8%
01-01-15	47,563,744	54,102,674	6,538,930	87.9%
01-01-17	52,869,647	57,165,777	4,296,130	92.5%

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 subject to a corridor between 80 to 120 percent of the market value of the 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.

BRISTOL TOWNSHIP 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.

BRISTOL TOWNSHIP POLICE PENSION PLAN
 SUPPLEMENTARY INFORMATION
 (UNAUDITED)

SCHEDULE OF CONTRIBUTIONS FROM EMPLOYER
 AND OTHER CONTRIBUTING ENTITIES

Year Ended December 31	Annual Required Contribution	Percentage Contributed
2012	\$ 1,333,152	100.0%
2013	1,287,488	100.0%
2014	1,739,662	100.0%
2015	2,219,238	100.0%
2016	1,617,617	103.9%
2017	1,511,398	100.0%

BRISTOL TOWNSHIP POLICE 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	8 years
Asset valuation method	The actuarial value of assets will be limited to a maximum of 120% and a minimum of 80% of the fair market value of assets.
Actuarial assumptions:	
Investment rate of return	8.0%
Projected salary increases	6.0%
Cost-of-living adjustments	3.0%

BRISTOL TOWNSHIP POLICE PENSION PLAN
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Tom W. Wolf
Governor
Commonwealth of Pennsylvania

Mr. Craig Bowen
Council President

Ms. Cynthia Murphy
Council Vice President

Mr. Patrick Antonello
Councilman

Mr. Raymond Blaylock
Councilman

Mr. Joe Glasson
Councilman

Mr. John Monahan
Councilman

Ms. Maryann Wagner
Councilwoman

Mr. William J. McCauley, III
Township Manager

Mr. Francis X. Phillips
Finance Officer

This report is a matter of public record and is available online at www.PaAuditor.gov. Media questions about the report can be directed to the Pennsylvania Department of the Auditor General, Office of Communications, 229 Finance Building, Harrisburg, PA 17120; via email to: news@PaAuditor.gov.