

LIMITED PROCEDURES ENGAGEMENT

Wilson Borough Non-Uniformed Pension Plan Northampton County, Pennsylvania For the Period January 1, 2014 to December 31, 2017

December 2018



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
Wilson Borough
Northampton County
Easton, PA 18042

We conducted a Limited Procedures Engagement (LPE) of the Wilson Borough Non-Uniformed Pension Plan for the period January 1, 2014 to December 31, 2017 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 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, 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.

Based on the results of our procedures performed during our LPE, nothing came to our attention indicating that the Wilson Borough 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 A Net Overpayment 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 borough 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 Wilson Borough and, where appropriate, their responses have been included in this report. We would like to thank borough officials for the cooperation extended to us during the conduct of this LPE.

November 26, 2018



EUGENE A. DEPASQUALE
Auditor General

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WILSON BOROUGH NON-UNIFORMED PENSION PLAN
FINDING AND RECOMMENDATION

Finding – Incorrect Data On Certification Form AG 385 Resulting In A Net Overpayment Of State Aid

Condition: The borough certified an ineligible police officer and overstated payroll by \$64,278 and failed to certify an eligible non-uniformed employee's payroll thereby understating total eligible payroll by \$7,062 on the Certification Form AG 385 filed in 2015. In addition, the borough failed to certify the correct compensation for eligible police officers, firefighters and non-uniformed employees and understated payroll by \$35, \$1,814 and \$8,093, respectively, on the Certification Form AG 385 filed in 2016. Furthermore, the borough certified an ineligible police officer and overstated payroll by \$26,477 and failed to certify the correct compensation for eligible firefighters and non-uniformed employees thereby understating eligible payroll by \$2,291 and \$7,807, respectively, on the Certification Form AG 385 filed in 2017. Finally, subsequent to the current period, the borough again failed to correctly certify the compensation for eligible police officers, firefighters and non-uniformed employees and understated payroll totals by \$17,787, \$3,129 and \$8,557, respectively, on the Certification Form AG 385 filed in 2018.

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.

In addition, Act 205 at Section 402(e)(2) states, in part:

For the purpose of computing and reporting the applicable number of units, a DROP participant shall not be reported to the Auditor General as an active employee.

Furthermore, pursuant to the instructions that accompany Certification Form AG 385, the total payroll eligible to be certified should be Internal Revenue Service Form W-2 earnings pertaining to full-time positions.

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

WILSON BOROUGH NON-UNIFORMED PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

Effect: The data submitted on these certification forms 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 allocations were based on pension costs, the incorrect certification of pension data affected the borough’s state aid allocations, as identified below:

<u>Year</u>	<u>Type Of Plan</u>	<u>Normal Cost</u>	<u>Payroll Overstated (Understated)</u>	<u>State Aid Overpayment (Underpayment)</u>
2015	Police	14.87%	\$ 64,278	\$ 9,558
	Non-Uniformed	6.49%	(7,062)	(458)
Total				<u>\$ 9,100</u>
2016	Police	11.49%	\$ (35)	\$ (4)
	Non-Uniformed	6.48%	(8,093)	(524)
	Firemen’s	9.31%	(1,814)	(169)
Total				<u>\$ (697)</u>
2017	Police	11.49%	\$ 26,477	\$ 3,042
	Non-Uniformed	6.48%	(7,807)	(506)
	Firemen’s	9.31%	(2,291)	(213)
Total				<u>\$ 2,323</u>
2018	Police	11.13%	\$ (17,787)	\$ (1,980)
	Non-Uniformed	5.91%	(8,557)	(506)
	Firemen’s	7.83%	(3,129)	(245)
Total				<u>\$ (2,731)</u>
Net Overpayment of State Aid				<u><u>\$ 7,995</u></u>

In addition, the borough used the overpayments of state aid to pay the minimum municipal obligations (MMOs) due to the police, non-uniformed and firemen’s pension plans; therefore, if the reimbursement to the Commonwealth is made from the pension plans, the plan’s MMOs will not be fully paid.

WILSON BOROUGH NON-UNIFORMED PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

Recommendation: We recommend that the net overpayment of state aid, in the amount of \$7,995, plus interest, 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, 321 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 police, firemen's and/or non-uniformed pension plan funds, we recommend that any resulting MMO deficiencies 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: The borough's compliance with the finding recommendation will be monitored subsequent to the release of the audit report and through our next engagement of the pension plan.

WILSON BOROUGH NON-UNIFORMED PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

The supplementary information contained on Pages 4 and 5 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, AND 2016

	<u>2014</u>	<u>2015</u>	<u>2016</u>
Total Pension Liability			
Service cost	\$ 84,879	\$ 84,075	\$ 86,332
Interest	160,304	161,120	167,493
Difference between expected and actual experience	(77,516)	-	(35,526)
Changes of assumptions	-	(9,922)	65,670
Transfers	-	691	-
Benefit payments, including refunds of member contributions	(184,049)	(120,636)	(120,636)
Net Change in Total Pension Liability	<u>(16,382)</u>	<u>115,328</u>	<u>163,333</u>
Total Pension Liability – Beginning	<u>2,931,596</u>	<u>2,915,214</u>	<u>3,030,542</u>
Total Pension Liability – Ending (a)	<u><u>\$ 2,915,214</u></u>	<u><u>\$ 3,030,542</u></u>	<u><u>\$ 3,193,875</u></u>
Plan Fiduciary Net Position			
Contributions – employer*	\$ 35,956	\$ 40,000	\$ 33,466
Contributions – PMRS assessment	-	20	-
Contributions – member	41,222	41,053	45,111
PMRS investment income	154,400	165,804	173,522
Market value investment income	46,424	(164,929)	78,369
Transfers	-	691	-
Benefit payments, including refunds of member contributions	(184,049)	(120,636)	(120,636)
PMRS administrative expense	(420)	(460)	(440)
Additional administrative expense	(5,921)	(6,912)	(8,501)
Net Change in Plan Fiduciary Net Position	<u>87,612</u>	<u>(45,369)</u>	<u>200,891</u>
Plan Fiduciary Net Position – Beginning	<u>2,917,772</u>	<u>3,005,384</u>	<u>2,960,015</u>
Plan Fiduciary Net Position – Ending (b)	<u><u>\$ 3,005,384</u></u>	<u><u>\$ 2,960,015</u></u>	<u><u>\$ 3,160,906</u></u>
Net Pension Liability – Ending (a-b)	<u><u>\$ (90,170)</u></u>	<u><u>\$ 70,527</u></u>	<u><u>\$ 32,969</u></u>
Plan Fiduciary Net Position as a Percentage of the Total Pension Liability	103.09%	97.67%	98.97%
Estimated Covered Employee Payroll	\$ 668,219	\$ 669,620	\$ 713,886
Net Pension Liability as a Percentage of Covered Employee Payroll	(13.49%)	10.53%	4.62%

* 2014 employer contributions includes actuarial surplus used for disability insurance premiums of \$970 and administrative expenses of \$420.

WILSON BOROUGH 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 borough as of December 31, 2014 and 2015, calculated using the discount rate of 5.50%, as well as what the borough'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	\$ 175,688	\$ (90,170)	\$ (319,309)
Net Pension Liability – 12/31/15	\$ 339,384	\$ 70,527	\$ (160,020)

In addition, the following presents the net pension liability of the borough as of December 31, 2016, calculated using the discount rate of 5.25%, as well as what the borough'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	\$ 323,517	\$ 32,969	\$ (215,003)

WILSON BOROUGH 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	\$ 2,839,786	\$ 2,773,429	\$ (66,357)	102.4%
01-01-15	3,078,538	2,915,214	(163,324)	105.6%
01-01-17	3,391,503	3,193,875	(197,628)	106.2%

WILSON BOROUGH 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.

WILSON BOROUGH NON-UNIFORMED PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

SCHEDULE OF CONTRIBUTIONS FROM EMPLOYER
AND OTHER CONTRIBUTING ENTITIES

Year Ended December 31	Annual Required Contribution	Percentage Contributed
2012	\$ 36,631	100.0%
2013	32,590	108.4%
2014	29,493	117.2%
2015	35,052	114.1%
2016	32,758	102.2%
2017	29,777	101.9%

WILSON BOROUGH NON-UNIFORMED PENSION PLAN
 SUPPLEMENTARY INFORMATION
 NOTES TO SUPPLEMENTARY SCHEDULES
 (UNAUDITED)

Actuarial valuation date	January 1, 2017
Actuarial cost method	Entry age normal
Amortization method	N/A
Remaining amortization period	N/A
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

WILSON BOROUGH NON-UNIFORMED PENSION PLAN
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Tom W. Wolf
Governor
Commonwealth of Pennsylvania

The Honorable Donald R. Barrett, Jr.
Mayor

Mr. Tony Verenna
Council President

Ms. Jill Garcia
Borough Manager

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