

COMPLIANCE AUDIT

Wyomissing Borough Non-Uniformed Defined Benefit Pension Plan

Berks County, Pennsylvania
For the Period
January 1, 2016 to December 31, 2019

March 2021



Commonwealth of Pennsylvania
Department of the Auditor General

Timothy L. DeFoor • Auditor General



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**TIMOTHY L. DEFOOR
AUDITOR GENERAL**

The Honorable Mayor and Borough Council
Wyomissing Borough
Berks County
Wyomissing Borough, PA 19610

We have conducted a compliance audit of the Wyomissing Borough Non-Uniformed Defined Benefit Pension Plan for the period January 1, 2016 to December 31, 2019. We also evaluated compliance with some requirements subsequent to that period when possible. The audit was conducted pursuant to authority derived from the Municipal Pension Plan Funding Standard and Recovery Act (Act 205 of 1984, as amended, 53 P.S. § 895.402(j)), which requires the Auditor General, as deemed necessary, to audit every municipality which receives general municipal pension system state aid and every municipal pension plan and fund in which general municipal pension system state aid is deposited. The audit was not conducted, nor was it required to be, in accordance with Government Auditing Standards issued by the Comptroller General of the United States. We planned and performed the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and 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 plan members who retired and vested during the current audit period, subsequent to 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 and payable to the recipients.
- We determined whether the January 1, 2015, January 1, 2017, and January 1, 2019 actuarial valuation reports were prepared and submitted by March 31, 2016, 2018, and 2020, 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.

Wyomissing Borough contracted with an independent certified public accounting firm for annual audits of its basic financial statements, which are available at the borough's offices. Those financial statements were not audited by us and, accordingly, we express no opinion or other form of assurance on them.

Borough officials are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the Wyomissing Borough Non-Uniformed Defined Benefit Pension Plan is administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies. As previously described, we tested transactions, interviewed selected officials, and performed procedures to the extent necessary 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.

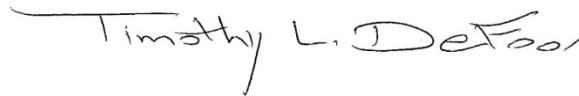
The results of our procedures indicated that, in all significant respects, the Wyomissing Borough Non-Uniformed Defined Benefit Pension Plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies, except as noted in the following finding further discussed later in this report:

Finding – Disability Pension Benefit Paid To Former Vested Member In Excess
Of The Plan Document

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 Wyomissing Borough and, where appropriate, their responses have been included in the report. We would like to thank borough officials for the cooperation extended to us during the conduct of the audit.

A handwritten signature in black ink that reads "Timothy L. DeFoor". The signature is written in a cursive style with a long horizontal line extending to the left of the first letter.

Timothy L. DeFoor
Auditor General

March 17, 2021

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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.

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 Wyomissing Borough Non-Uniformed Defined Benefit Pension Plan is also governed by implementing regulations published at Title 16, Part IV of the Pennsylvania Code and applicable provisions of various other state statutes.

The Wyomissing Borough Non-Uniformed Defined Benefit Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of Ordinance No. 1208. The plan is also affected by the provisions of collective bargaining agreements between the borough and its non-uniformed employees. The plan was established January 1, 1965. Active members are not required to contribute to the plan. As of December 31, 2019, the plan had 19 active members, 4 terminated members eligible for vested benefits in the future, and 26 retirees receiving pension benefits.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
FINDING AND RECOMMENDATION

Finding – Disability Pension Benefit Paid To Former Vested Member In Excess Of The Plan Document

Condition: The borough is paying a disability pension benefit to a recipient in excess of the provisions in the plan’s governing document. A former employee and plan member, who terminated employment with the borough on June 13, 2013 at age 48 after 19 years of credited service, was entitled to a monthly vested pension benefit in the amount of \$985 payable at the individual’s normal retirement date, August 1, 2030, according to borough records. However, in September 2018, the borough began paying the former member a monthly disability benefit, which is in excess of provisions in the plan’s governing document. The individual requested a disability benefit after submitting a determination letter from the Social Security Administration (SSA) indicating eligibility to receive a monthly disability benefit from SSA effective March 2017. Subsequently during 2018, the municipality decided to also begin paying the former member a monthly disability benefit in the amount of \$985 even though the member had been separated from borough employment since 2013. The municipality also made a retroactive payment for the period March 2017 (*date of SSA disability*) to September 2018 totaling \$19,701. Moreover, the borough awarded a 3 percent cost-of-living adjustment (COLA) to the recipient in 2018 increasing the excess monthly benefit to \$1,015 and made an additional retroactive payment totaling \$354 to the former member due to the timing of the COLA. Furthermore, in 2019, the borough awarded another 3 percent COLA, which further increased the recipient’s monthly benefit to \$1,044. Finally, in 2020, the borough granted an additional 3 percent COLA, which increased the recipient’s monthly benefit to \$1,074. Therefore, the total excess disability payments paid to the recipient from the pension plan amounted to \$48,543 as of December 31, 2020.

Criteria: Section 102 of Act 205 contains the following definitions:

“Pension plan or system.” The various aspects of the relationship between a municipality and its employees with respect to the retirement coverage provided by a municipality to the employees.

“Defined benefit pension plan.” A type of pension benefit plan, which provides for periodic benefit payments at retirement which are predeterminable and which have a variable financing requirement dependent upon the actuarial calculation of actuarial present value requirements for projected benefits.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

Sections 6.01 and 4.04 of the pension plan’s governing document, Ordinance No. 1208, state, in part:

Vesting and Severance of Employment: If a MEMBER who has completed less than ten (10) years of SERVICE leaves the employ of the BOROUGH or ceases to be a MEMBER whether by reason of his transfer, resignation or discharge, shall not be eligible for benefits, however, a MEMBER who has completed ten (10) or more years of SERVICE shall be entitled to receive a vested pension benefit to start at his NORMAL RETIREMENT DATE.

Disability Benefit: A MEMBER who has completed a minimum of ten (10) years of SERVICE with the BOROUGH and who retires because of a TOTAL AND PERMANENT DISABILITY, is eligible to receive a monthly disability benefit commencing as of the first day of the month coincident with or next following his date of disability retirement and ending with the payment made as of the first day of the month in which his death occurs or which the MEMBER is no longer totally and permanently disabled.

Furthermore, Sections 1.11, 1.12 and 1.16 of Ordinance No. 1208, provide the following definitions:

“Member” shall mean any Employee who has satisfied the eligibility requirements established in Article II hereof. *(Article II of Ordinance No. 1208 defines eligibility as All persons who are Employees...as of the Effective date hereof shall be a Member as of the Effective Date and any person who becomes an Employee after the Effective Date hereof shall become a Member on the first day of Service as an Employee...)*

“Normal Retirement date” shall mean the first day of the month coincident with or next following the date on which the Member attains Age 65.

“Total and Permanent Disability” shall mean any condition arising from an illness or injury in which the employee is eligible for and receives disability benefits from the Federal Social Security Program.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

In addition, Section 4.06 the pension plan’s governing document, Ordinance No. 1208, states, in part:

Cost of Living Increases: There shall be a cost of living increase provided to all retiring MEMBERS. The benefits shall automatically increase by three percent (3%) each year after retirement, up to a maximum increase of thirty percent (30%). The annual three percent (3%) increase and the thirty percent (30%) maximum increase are based upon the MEMBER’S initial retirement benefit.

Cause: Borough officials consulted with their solicitor and pension advisor and relied on guidance that the ordinance did not limit the eligibility for disability pension to a member going directly from borough employment to a disability benefit. And although the individual left employment with the borough in 2013 due to termination, officials believed that the recipient retired in 2017 due to becoming totally and permanently disabled. Therefore, the borough concluded that in this context, “retired” means the individual stopped working, not that he stopped working for the borough.

Effect: The plan is paying disability pension benefits to a recipient that are not in accordance with provisions of the plan’s governing document. The recipient received total excess benefits from the plan amounting to \$48,543 from March 1, 2017 through December 31, 2020.

Providing unauthorized pension benefits increases the plan’s pension costs and reduces the amount of funds available for investment purposes or for the payment of authorized benefits or administrative expenses. Since the borough received state aid based on unit value during 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 recommend that the borough limit future pension benefits to those authorized by the plan’s governing document. In addition, we recommend that the plan be reimbursed for the unauthorized payments made in the total amount of \$48,543 from March 2017 through December 2020. If the borough continues to distribute excess benefits from the plan, these excess payments will be deemed ineligible for funding with state aid. Accordingly, the pension plan’s actuary may be required to determine the impact, if any, of the excess benefit payments on the borough’s future state aid allocations and submit this information to the Department. If it is determined the excess benefit payments had an impact on the borough’s future state aid allocations after the submission of this information, the plan’s actuary would then be required to contact the Department to verify the overpayment of state aid received. Plan officials would then be required to reimburse the overpayment to the Commonwealth.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

Management’s Response: The borough, with assistance from its solicitor, provided the following response:

The Borough of Wyomissing does not dispute that a disability pension benefit was paid to a former employee/vested member of the pension plan, retroactive to March 2017, with cost-of-living adjustments from that date to the present. Also, the payment amounts stated in the proposed finding are accurate. However, the Borough does dispute the statement that the former employer was employed by another entity at the time of disablement. *[Auditor’s Note: The statement referenced appeared in an earlier version of the finding but has since been removed.]* A review of the former employee’s personnel file does not reflect any information regarding employment of the former employee by any other entity subsequent to his employment by the Borough, including at the time he sought the disability pension benefit from the Borough. To the contrary, the Borough’s personnel file reflects that the former employee sought unemployment compensation benefits after the termination of his employment by the Borough.

The proposed finding correctly states the text of certain definitions under Section 102 of Act 205, and accurately quotes the relevant terms of the governing Borough ordinance for the Non-Uniformed (DB) Pension Plan of the Borough, Ordinance No. 1208. However, the Borough disputes the Department’s interpretation of the meaning of the terms of Ordinance No. 1208, and the conclusion drawn by the Department as a consequence of such interpretation. It is undisputed that the former employee was terminated from his employment with the Borough effective June 13, 2013, that he received a determination from the Social Security Administration that he became disabled on July 12, 2016, and that he became entitled to disability benefits from the Social Security Administration beginning March 2017. Under Ordinance No. 1208, the former employee met the definition of Total and Permanent Disability when he received the determination of disability benefit eligibility from the Social Security Administration. Under the Disability Benefit section of Ordinance No. 1208, a vested member “... who retires because of a total and permanent disability, is eligible to receive a monthly disability benefit ...” The Department’s interpretation of the Disability Benefit section of Ordinance No. 1208 is that the words “retires because of” mean that a vested member of the pension plan must go directly from Borough employment to a disability benefit in order to qualify for the disability benefit.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

The Borough does not share the Department’s interpretation. The term “retire” or “retires” is not defined in the Ordinance. Ordinance No. 1208 does not state that the vested member must “retire directly from employment with the Borough because of a total and permanent disability”; the underlined words are necessary to support the Department’s conclusion, but those words are simply not there. To the contrary, the Borough’s interpretation that “retires because of a total and permanent disability” includes a vested former employee who is no longer able to work anywhere, as determined by the Social Security Administration, is both reasonable and proper, under the facts and circumstances of this particular case.

The former employee’s personnel file reveals chronic sickness throughout the term of his employment with the Borough. *[Auditor’s Note: Certain additional detailed personnel information was provided, but omitted from this response based on the department’s confidentiality policy.]* Clearly, the conditions which led to the determination by the Social Security Administration of disability benefit eligibility as of July 12, 2016 did not come into existence only after June 13, 2013, but were manifest for many years during his employment with the Borough. But for the generous leave policies of the Borough, the former employee’s health condition would have prevented him from being employed until the time of his termination in 2013. The Borough’s personnel file for the former employee does not reveal when the former employee initiated the process to obtain disability benefits from the Social Security Administration. The determination of disability benefit eligibility by the Social Security Administration does not occur quickly. It is possible that the process began for the former employee shortly after he left employment with the Borough; it is possible he began the process while he was still employed by the Borough. In any event, it was the former employee’s health condition while he was employed by the Borough which led to the Borough’ determination that he retired because of a total and permanent disability, upon receipt of documents from the former employee confirming Social Security Administration disability benefit eligibility, as required by Ordinance No. 1208.

To the extent the Ordinance language which reads “retires because of a total and permanent disability” is susceptible to more than one meaning, the interpretation of the Borough is controlling. Section 429 of Ordinance No. 1208 provides that “The Council shall construe the plan, shall determine any questions of fact arising under the plan and shall make all

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

decisions required of it under the plan or the trust agreement and its construction thereof and decisions and actions taken thereon in good faith shall be final and conclusive. It may correct any defect or supply any omission or reconcile any inconsistency in such manner and to such extent as it shall deem expedient to carry the plan into effect, and it shall be the sole judge of such expediency. The Council shall act uniformly with respect to matters coming before it concerning employees in similar circumstances”. Clearly, the intent of Section 429 is to give the Borough latitude to interpret any ambiguous language in the pension plan, so long as employees in similar circumstances are treated uniformly. There are no other former employees who have requested disability pension benefits from the Borough’s non-uniformed (DB) pension plan. Therefore, the Borough’s interpretation, as applied to the facts and circumstances recited here and in the Department’s audit report, should be upheld. The Borough contends that the disability pension benefits were properly paid, and should continue to be paid.

If the Borough were to accept the Department’s position, and discontinue payment of the disability pension benefits to the former employee, the Borough would expose itself to the costs of litigation with the former employee, the uncertainty of a favorable outcome, and the real possibility that disability benefits could be awarded for additional years beginning with the date of termination of employment, due to facts and circumstances concerning the former employee’s chronic health issues while he was employed. These costs, altogether, could total \$50,000 to \$100,000.

The Borough has, since 2018, calculated its pension costs taking into account the payments to the former employee for the disability pension benefit. The Borough is not jeopardizing or diminishing its financial support for all of its other pension obligations because of its payment of the disability pension benefit to the former employee. It is meeting all of its pension obligations.

Rather than discontinue payment of the disability pension benefit to the former employee, as recommended by the Department (because the Borough believes those payments are being paid in accordance with the correct interpretation of Ordinance No. 1208), the Borough proposes to seek through negotiation with the union which represents the bargaining group of which the former employee was a member while he was employed by the Borough, an agreement to permit amendment of Ordinance No. 1208 to add language which would require any applicant for a disability pension benefit to transition directly from Borough employment to disability pension benefit without any intervening employment, and for such applicant to have applied for a determination of Social Security Administration disability pension eligibility within a specific number of days after termination of employment. Such an amendment of the Ordinance would eliminate the ambiguity and uncertainty, which apparently is associated with the existing disability pension benefit language of the Ordinance.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

Auditor's Conclusion: Although the department understands the position taken by the borough, we respectfully disagree with the borough's position relative to this issue. As noted in the condition above, at the time of the employee's separation from employment with the borough, this individual was entitled to a vested benefit, according to the plan's governing document and records provided by the borough, which was to commence on August 1, 2030. The department does not purport to conclude what occurred between the individual's separation from employment with the borough in 2013 to the date of the individual's disability determination by the Social Security Administration in 2017, merely that the amount of monthly pension benefit due the member upon terminating employment with the borough was a vested benefit determined by the borough due on his superannuation date. Therefore, the finding remains as stated. If the borough continues to distribute excess benefits from the plan, these excess payments will be deemed ineligible for funding with state aid. Accordingly, the pension plan's actuary may be required to determine the impact, if any, of the excess benefit payments on the borough's future state aid allocations. Moreover, in regards to the borough's proposed intentions to amend the plan document through the collective bargaining process, Article VIII, Section 10 of the Pennsylvania Constitution and Section 404 of the Fiscal Code as amended, 72 P.S. 404, prohibits the Auditor General from giving pre-audit advice regarding any transaction in which there is a subsequent duty to audit; and as such, express no opinion regarding this intended action. Compliance will be evaluated during our next audit of the plan.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT 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, 2015, 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)
01-01-15	\$ 5,705,084	\$ 5,133,181	\$ (571,903)	111.1%
01-01-17	5,794,961	5,924,660	129,699	97.9%
01-01-19	5,881,923	7,042,234	1,160,311	83.5%

The Actuarial Accrued Liability as of 01-01-19 increased as a result of actuarial losses incurred since the 01-01-15 valuation information.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT 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.

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
 SUPPLEMENTARY INFORMATION
 (UNAUDITED)

SCHEDULE OF CONTRIBUTIONS

<u>Year Ended December 31</u>	<u>Actuarially Determined Contribution</u>	<u>Actual Contributions</u>	<u>Contribution Deficiency (Excess)</u>	<u>Covered- Employee Payroll</u>	<u>Contributions as a Percentage of Covered- Employee Payroll</u>
2014	\$ 200,210	\$ 200,944	\$ (734)	\$ 1,385,047	14.51%
2015	105,810	116,941	(11,131)	1,524,828	7.67%
2016	93,308	112,366	(19,058)	1,577,959	7.12%
2017	90,795	110,118	(19,323)	1,551,611	7.10%
2018	82,794	117,110	(34,316)	1,467,717	7.98%
2019	162,884	330,085	(167,201)	1,534,215	21.51%

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT 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, 2019
Actuarial cost method	Entry age
Amortization method	Level dollar
Remaining amortization period	13 years
Asset valuation method	Fair value
Actuarial assumptions:	
Investment rate of return	7.5%
Projected salary increases	4.5%
Cost-of-living adjustments	3.0%

WYOMISSING BOROUGH NON-UNIFORMED DEFINED BENEFIT PENSION PLAN
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

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