

COMPLIANCE AUDIT

West Reading Borough Non-Uniformed Pension Plan Berks County, Pennsylvania For the Period January 1, 2015 to December 31, 2018

January 2020



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
West Reading Borough
Berks County
West Reading, PA 19611

We have conducted a compliance audit of the West Reading Borough Non-Uniformed 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 lone plan member who retired during the current audit period represents payments to all (and only) those entitled to receive them and was 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 the retired individual and comparing this amount to supporting documentation evidencing amount determined and actually paid to the recipient. We also determined whether retirement benefits calculated for the 12 plan members 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 benefit due to retired individuals and comparing these amounts to supporting documentation evidencing amounts determined.
- We determined whether retirement benefits calculated for the one plan member who terminated employment and elected a lump-sum form of pension benefit 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 comparing the distributed amounts to supporting documentation evidencing amounts determined and actually paid to recipients.
- 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.
- We determined whether the terms of the contractual agreement with the Pennsylvania State Association of Boroughs were in accordance with the plan's governing document, if separately stated, and applicable laws and regulations by comparing the terms of the contractual agreement with the plan's governing document, if separately stated, and applicable laws and regulations.
- We determined whether transfers were properly authorized, timely, and appropriately recorded by plan officials by examining supporting documentation for the transfer made during the audit period.

Borough officials are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the West Reading Borough Non-Uniformed Defined Contribution 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 borough's internal controls as they relate to the borough'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 West Reading Borough Non-Uniformed 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 West Reading 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.

December 19, 2019



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 West Reading Borough Non-Uniformed 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 West Reading Borough Non-Uniformed Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of Ordinance No. 937, as amended, for non-uniformed employees hired prior to January 1, 2015. The borough vested all plan members and froze all benefits earned as of December 31, 2014. 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, 1974. Active members are not required to contribute to the plan. As of December 31, 2018, the plan had no active members, 22 terminated members eligible for vested benefits in the future, and 6 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

Early Retirement Age 55 with 10 years of service.

Vesting All members are 100% vested. Plan is frozen as of January 1, 2015.

Retirement Benefit:

Benefit equals 1.65% of the Basic Monthly Earnings multiplied by the total number of years of benefit service to date. Average monthly compensation is the final 60 month period of employment. Benefit accrual is frozen as of January 1, 2015.

Survivor Benefit:

None

Disability Benefit:

Monthly benefit payable until the earliest of retirement, death or recovery, and a deferred annuity payable at normal retirement age. The amount is equal to the accrued benefit on the date of disability.

WEST READING BOROUGH NON-UNIFORMED PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

The supplementary information contained on Pages 3 through 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, 2016, 2017, AND 2018

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Total Pension Liability					
Service cost	\$ 59,364	\$ 60,858	\$ 63,292	\$ -	\$ -
Interest	108,241	114,838	123,482	83,857	85,270
Change of benefit terms	-	-	-	(483,994)	-
Difference between expected and actual experience	-	(25,729)	-	(109,796)	-
Changes of assumptions	-	-	-	(34,380)	-
Benefit payments, including refunds of member contributions	(48,052)	(50,192)	(59,097)	(63,670)	(63,670)
Net Change in Total Pension Liability	<u>119,553</u>	<u>99,775</u>	<u>127,677</u>	<u>(607,983)</u>	<u>21,600</u>
Total Pension Liability – Beginning	<u>1,510,957</u>	<u>1,630,510</u>	<u>1,730,285</u>	<u>1,857,962</u>	<u>1,249,979</u>
Total Pension Liability – Ending (a)	<u><u>\$ 1,630,510</u></u>	<u><u>\$ 1,730,285</u></u>	<u><u>\$ 1,857,962</u></u>	<u><u>\$ 1,249,979</u></u>	<u><u>\$ 1,271,579</u></u>
Plan Fiduciary Net Position					
Contributions – employer	\$ 50,507	\$ 72,207	\$ -	\$ -	\$ -
Contributions – state aid	-	-	21,978	-	-
Net investment income	137,708	(17,512)	94,075	273,381	(106,795)
Benefit payments, including refunds of member contributions	(48,052)	(50,192)	(59,097)	(63,670)	(63,670)
Administrative expense	(6,756)	(6,992)	(10,223)	(22,210)	(18,679)
Net Change in Plan Fiduciary Net Position	<u>133,407</u>	<u>(2,489)</u>	<u>46,733</u>	<u>187,501</u>	<u>(189,144)</u>
Plan Fiduciary Net Position – Beginning (1)	<u>1,928,850</u>	<u>2,062,257</u>	<u>2,063,772</u>	<u>2,110,505</u>	<u>2,298,006</u>
Plan Fiduciary Net Position – Ending (b)	<u><u>\$ 2,062,257</u></u>	<u><u>\$ 2,059,768</u></u>	<u><u>\$ 2,110,505</u></u>	<u><u>\$ 2,298,006</u></u>	<u><u>\$ 2,108,862</u></u>
Net Pension Liability – Ending (a-b)	<u><u>\$ (431,747)</u></u>	<u><u>\$ (329,483)</u></u>	<u><u>\$ (252,543)</u></u>	<u><u>\$ (1,048,027)</u></u>	<u><u>\$ (837,283)</u></u>
Plan Fiduciary Net Position as a Percentage of the Total Pension Liability	126.5%	119.0%	113.6%	183.8%	165.8%
Estimated Covered Employee Payroll	\$ 648,984	\$ 658,588	\$ 698,333	\$ -	\$ -
Net Pension Liability as a Percentage of Covered Employee Payroll	(66.5%)	(50.0%)	(36.2%)	N/A	N/A

(1) The beginning balance at January 1, 2016 was adjusted by \$4,004 for prepaid pension payments.

WEST READING 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, 2015, 2016, 2017, and 2018, calculated using the discount rate of 7.0%, 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:

	1% Decrease (6.0%)	Current Discount Rate (7.0%)	1% Increase (8.0%)
Net Pension Liability – 12/31/15	\$ (49,520)	\$ (329,483)	\$ (561,892)
Net Pension Liability – 12/31/16	\$ 43,585	\$ (252,543)	\$ (499,337)
Net Pension Liability – 12/31/17	\$ (856,967)	\$ (1,048,027)	\$ (1,202,237)
Net Pension Liability – 12/31/18	\$ (646,941)	\$ (837,283)	\$ (991,648)

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	\$ 32,594	\$ 32,594	\$ -	\$ 715,561	4.6%
2010	95,126	95,126	-	734,804	12.9%
2011	97,697	97,697	-	617,452	15.8%
2012	51,509	51,509	-	727,971	7.1%
2013	51,335	51,335	-	711,431	7.2%
2014	50,507	50,507	-	648,984	7.8%
2015	72,207	72,207	-	658,588	11.0%
2016	21,978	21,978	-	698,333	3.1%
2017	-	-	-	-	N/A
2018	-	-	-	-	N/A

WEST READING BOROUGH NON-UNIFORMED PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

SCHEDULE OF INVESTMENT RETURNS

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

2018	(4.65%)
2017	12.95%
2016	4.56%
2015	(0.85%)
2014	7.14%

WEST READING 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	\$ 1,513,242	\$ 1,355,116	\$ (158,126)	111.7%
01-01-15	2,062,257	1,604,781	(457,476)	128.5%
01-01-17	2,110,505	1,229,792	(880,713)	171.6%

WEST READING 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.

WEST READING BOROUGH 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	N/A
Remaining amortization period	N/A
Asset valuation method	Market value
Actuarial assumptions:	
Investment rate of return	7.0%
Projected salary increases	4.0%

WEST READING BOROUGH NON-UNIFORMED PENSION PLAN
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