

COMPLIANCE AUDIT

Schuylkill Township Non-Uniformed Pension Plan Chester County, Pennsylvania For the Period January 1, 2015 to December 31, 2018

September 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**

Board of Township Supervisors
Schuylkill Township
Chester County
Devon, PA 19333

We have conducted a compliance audit of the Schuylkill Township 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 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 all 3 of the 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 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.

Township officials are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the Schuylkill Township Non-Uniformed 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 Schuylkill Township 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 Schuylkill 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.

September 3, 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

CONTENTS

	<u>Page</u>
Background.....	1
Supplementary Information	3
Report Distribution List	9

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

The Schuylkill Township Non-Uniformed Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of a resolution dated February 4, 1981, as amended. Active members are required to contribute 5 percent of compensation to the plan. As of December 31, 2018, the plan had 10 active members, 3 terminated member eligible for vested benefits in the future, 3 retirees receiving pension benefits from the plan, and 1 retiree receiving benefits funded through annuities purchased with plan assets.

BACKGROUND – (Continued)

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

Eligibility Requirements:

Normal Retirement	Age 62 and 10 years of service.
Early Retirement	None
Vesting	Vesting is 100% upon immediate participation.

Retirement Benefit:

Benefit is 1.65% of the final average monthly compensation during the last three years of calendar years of employment plus a service increment of an additional \$100 per month for the completion of 26 or more years of service up to a maximum of \$500 per month.

Survivor Benefit:

Upon the death of an active vested member who is eligible for retirement on the date of death, but who is not retired, the surviving spouse or children under the age of 18 will be entitled to 50% of the accrued retirement benefit which the member would have been receiving at the time of death.

Disability Benefit:

None

SCHUYLKILL TOWNSHIP NON-UNIFORMED PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

The supplementary information contained on Pages 3 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, 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	\$ 68,181	\$ 72,138	\$ 76,106	\$ 87,628	\$ 92,448
Interest	92,614	104,855	115,779	118,120	130,838
Difference between expected and actual experience	-	(10,097)	-	(148,578)	-
Changes of assumptions	-	44,083	-	6,020	-
Benefit payments, including refunds of member contributions	(23,865)	(23,865)	(25,941)	(28,874)	(28,914)
Net Change in Total Pension Liability	<u>136,930</u>	<u>187,114</u>	<u>165,944</u>	<u>34,316</u>	<u>194,372</u>
Total Pension Liability – Beginning	1,266,813	1,403,743	1,590,857	1,756,801	1,791,117
Total Pension Liability – Ending (a)	<u>\$ 1,403,743</u>	<u>\$ 1,590,857</u>	<u>\$ 1,756,801</u>	<u>\$ 1,791,117</u>	<u>\$ 1,985,489</u>
Plan Fiduciary Net Position					
Contributions – Employer	\$ 5,886	\$ 6,235	\$ 8,022	\$ -	\$ -
Contributions – State Aid	27,109	27,446	24,066	45,883	41,472
Contributions – Member	22,049	26,822	30,012	33,840	30,808
Net investment income	100,469	(20,118)	137,768	309,846	(145,657)
Benefit payments, including refunds of member contributions	(23,865)	(23,865)	(25,941)	(28,874)	(28,914)
Administrative expense	(3,500)	(7,300)	(4,300)	(7,700)	(5,800)
Net Change in Plan Fiduciary Net Position	<u>128,148</u>	<u>9,220</u>	<u>169,627</u>	<u>352,995</u>	<u>(108,091)</u>
Plan Fiduciary Net Position – Beginning	1,585,151	1,713,299	1,722,519	1,892,146	2,245,141
Plan Fiduciary Net Position – Ending (b)	<u>\$ 1,713,299</u>	<u>\$ 1,722,519</u>	<u>\$ 1,892,146</u>	<u>\$ 2,245,141</u>	<u>\$ 2,137,050</u>
Net Pension Liability – Ending (a-b)	<u>\$ (309,556)</u>	<u>\$ (131,662)</u>	<u>\$ (135,345)</u>	<u>\$ (454,024)</u>	<u>\$ (151,561)</u>
Plan Fiduciary Net Position as a Percentage of the Total Pension Liability	122.1%	108.3%	107.7%	125.3%	107.6%
Covered Employee Payroll	\$ 423,754	\$ 430,332	\$ 499,958	\$ 619,034	\$ 658,986
Net Pension Liability as a Percentage of Covered Employee Payroll	(73.1%)	(30.6%)	(27.1%)	(73.3%)	(23.0%)

SCHUYLKILL TOWNSHIP 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 township as of December 31, 2014, 2015, 2016, 2017, and 2018 calculated using the discount rate of 7.00%, 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 (6.00%)	Current Discount Rate (7.00%)	1% Increase (8.00%)
Net Pension Liability – 12/31/14	\$ (118,509)	\$ (309,556)	\$ (473,669)
Net Pension Liability – 12/31/15	\$ 81,157	\$ (131,662)	\$ (314,297)
Net Pension Liability – 12/31/16	\$ 92,914	\$ (135,345)	\$ (331,549)
Net Pension Liability – 12/31/17	\$ (226,557)	\$ (454,024)	\$ (648,864)
Net Pension Liability – 12/31/18	\$ 92,300	\$ (151,561)	\$ (360,736)

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
2014	\$ 32,995	\$ 32,995	\$ -	\$ 423,754	7.79%
2015	33,681	33,681	-	430,332	7.83%
2016	32,088	32,088	-	499,958	6.42%
2017	45,079	45,883	(804)	619,034	7.41%
2018	41,472	41,472	-	658,986	6.29%

SCHUYLKILL TOWNSHIP NON-UNIFORMED PENSION PLAN
SUPPLEMENTARY INFORMATION
(UNAUDITED)

SCHEDULE OF INVESTMENT RETURNS

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

2018	(6.52%)
2017	16.45%
2016	8.07%
2015	(1.21%)
2014	7.11%

SCHUYLKILL TOWNSHIP 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	\$ 1,305,137	\$ 1,142,395	\$ (162,742)	114.2%
01-01-15	1,713,299	1,437,729	(275,570)	119.2%
01-01-17	1,892,146	1,614,243	(277,903)	117.2%

SCHUYLKILL TOWNSHIP 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.

SCHUYLKILL TOWNSHIP 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	Not applicable
Remaining amortization period	Not applicable
Asset valuation method	Market value
Actuarial assumptions:	
Investment rate of return	7.0%
Projected salary increases	5.5%
Cost-of-living adjustments	Maximum of 4% per year

SCHUYLKILL TOWNSHIP NON-UNIFORMED PENSION PLAN
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Tom W. Wolf
Governor
Commonwealth of Pennsylvania

Ms. Martha Majewski
Chairperson, Board of Township Supervisors

Mr. Fred Parry
Vice-Chairman, Board of Township Supervisors

Mr. Mark Donovan
Township Supervisor

Ms. Susan Guerette
Township Supervisor

Mr. Jim Morrisson
Township Supervisor

Mr. Edward M. Mentry, Jr.
Township Manager

Ms. Madeline M. Harbison
Township Secretary

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.