

COMPLIANCE AUDIT

Norwegian Township Police Pension Plan Schuylkill County, Pennsylvania For the Period January 1, 2021 to December 31, 2024

March 2026



Commonwealth of Pennsylvania
Department of the Auditor General

Timothy L. DeFoor • Auditor General



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**TIMOTHY L. DEFOOR
AUDITOR GENERAL**

Board of Township Supervisors
Norwegian Township
Schuylkill County
Mar Lin, PA 17951

We have conducted a compliance audit of the Norwegian Township Police Pension Plan for the period January 1, 2021 to December 31, 2024. 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 objectives. We believe that the evidence obtained provides a reasonable basis for our finding and 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 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 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 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 that there were no benefit calculations prepared for the years covered by our audit period.
- We determined whether the January 1, 2021 and January 1, 2023 actuarial valuation reports were prepared and submitted by March 31, 2022 and 2024, 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 Norwegian Township Police 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 objectives.

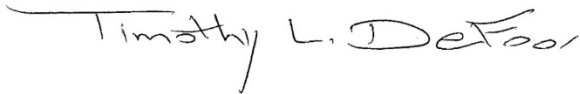
The results of our procedures indicated that, in all significant respects, the Norwegian Township Police Pension Plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies, except as noted in the following finding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

Finding – Partial Compliance With Prior Recommendation – Failure To
Pay The Minimum Municipal Obligation Of The Plan

The finding contained in this audit report repeats a condition that was cited in our **previous four audit reports** that has not been corrected by township officials. We are concerned by the township's failure to correct this previously reported finding and strongly encourage timely implementation of the recommendation noted in this audit report.

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 Norwegian 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.

A handwritten signature in black ink that reads "Timothy L. DeFoor". The signature is written in a cursive style with a horizontal line above the first few letters.

Timothy L. DeFoor
Auditor General
March 13, 2026

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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 two 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 Norwegian Township Police 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 including, but not limited to, the following:

Act 69 - The Second Class Township Code, Act of May 1, 1933 (P.L. 103, No. 69), as reenacted and amended, 53 P.S. § 65101 et seq.

The Norwegian Township Police Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of an ordinance dated December 2, 1975, as amended, adopted pursuant to Act 69. The plan was established December 2, 1975. As of December 31, 2024, the plan had no active members, no terminated members eligible for vested benefits in the future, and one retiree receiving pension benefits from the plan.

NORWEGIAN TOWNSHIP POLICE PENSION PLAN
STATUS OF PRIOR FINDING

Partial Compliance With Prior Recommendation

Norwegian Township has partially complied with the prior recommendation concerning the following:

· Failure To Pay The Minimum Municipal Obligation Of The Plan

As disclosed in prior audit reports, the township established a receivable in the amount of \$129,364 for the outstanding 2010 MMO due to the pension plan, with interest calculated annually on the outstanding amount, with the intention of paying \$10,000 per year beginning in 2013 towards this outstanding obligation. The township made payments in 2013, 2014, 2015, and 2016 totaling \$33,120 towards this outstanding obligation, and paid \$16,555 during 2018 towards this outstanding obligation and to pay in full the outstanding 2017 MMO. However, as disclosed in the most recent prior audit report, the township again failed to pay the MMOs due to its police pension plan for 2019 and 2020 in the amounts of \$3,445 and \$3,445, respectively, as required by Act 205, thereby further increasing the total MMO funding deficiency due to the police pension plan to \$170,419 as of December 31, 2020, which included cumulative interest calculated from January 1 of the year the MMOs were originally due. In addition, during the current audit period, the township paid \$15,593 in 2022 and \$14,086 in 2024 towards the outstanding MMO obligation; however, the township again failed to pay the annual MMO due to its police pension plan for the years 2021 and 2023, as required by Act 205, as further discussed in the Finding and Recommendation section of this report.

NORWEGIAN TOWNSHIP POLICE PENSION PLAN
FINDING AND RECOMMENDATION

Finding – Partial Compliance With Prior Recommendation – Failure To Pay The Minimum Municipal Obligation Of The Plan

Condition: As disclosed in the Status of Prior Finding section of this report, the township partially complied with our prior audit recommendation by depositing \$15,593 and \$14,086 during 2022 and 2024, respectively, towards its outstanding MMO obligation dating back to the 2010 MMO. However, a similar condition occurred during the current audit period. The township again failed to pay the MMO that was due to the police pension plan for the years 2021 in the amount of \$4,407 and 2023 in the amount of \$5,914. Based on the estimate prepared by the plan’s actuary, the total funding deficiency due to the township’s police pension plan amounted to \$187,424 as of December 31, 2024, including cumulative interest calculated from January 1 of the year the MMOs were originally due.

Criteria: With regard to the MMO, Section 302(c) of Act 205 states, in part:

Annually, the chief administrative officer of the pension plan shall determine the minimum obligation of the municipality with respect to the pension plan for the following plan year.

Section 302(d) of Act 205 states, in part:

The minimum obligation of the municipality shall be payable to the pension plan from the revenue of the municipality.

Furthermore, Section 302(e) of Act 205 states, in part:

Any amount of the minimum obligation of the municipality which remains unpaid as of December 31 of the year in which the minimum obligation is due shall be added to the minimum obligation of the municipality for the following year, with interest from January 1 of the year in which the minimum obligation was first due until the date the payment is paid at a rate equal to the interest assumption used for the actuarial valuation report or the discount rate applicable to treasury bills issued by the Department of Treasury of the United States with a six-month maturity as of the last business day in December of the plan year in which the obligation was due, whichever is greater, expressed as a monthly rate and compounded monthly.

NORWEGIAN TOWNSHIP POLICE PENSION PLAN
FINDING AND RECOMMENDATION

Finding – (Continued)

Cause: As first disclosed in the January 1, 2011 to December 31, 2014 audit report, an arbitration award significantly changed the benefit structure of the township's police pension plan and effectively doubled the liabilities of the pension plan. Furthermore, the only active police officer retired under the changed benefit structure and elected a joint and 100% survivor annuity. With this retirement and no active police officers, the township is no longer eligible to receive state aid or employee contributions to help fund the liability. In addition, the township lacked the available resources to fully fund the outstanding 2010, 2019, 2020, 2021, and 2023 MMO obligations to ensure compliance with the prior audit recommendation.

Effect: The failure to pay the MMO could result in the plan not having adequate resources to meet current and future benefit obligations to its remaining member. Due to the municipality's failure to fully pay the outstanding 2010 MMO balance as well as the outstanding 2019, 2020, 2021, and 2023 MMO balances due, the municipality must add the outstanding MMO balances due to the current year's MMO and include interest, as required by Act 205.

Recommendation: We again recommend that the municipality pay the outstanding MMO due to the police pension plan, for the years 2010, 2019, 2020, 2021, and 2023 with interest, in accordance with Section 302(e) of Act 205. A copy of the interest calculation must be maintained by the township for examination during our next audit of the plan.

Furthermore, we recommend that in the future, plan officials pay the full MMO due to the plan.

Management's Response: Municipal officials again agreed with the finding without exception.

Auditor's Conclusion: We are concerned that the municipality has not fully complied with the audit recommendation in the prior four audit reports and encourage compliance at the earliest opportunity to do so.

NORWEGIAN 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, 2019, 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)
01-01-19	\$ 237,948	\$ 267,193	\$ 29,245	89.1%*
01-01-21	226,049	265,891	39,842	85.0%*
01-01-23	217,238	256,322	39,084	84.8%*

Note: The market values of the plan’s assets at 01-01-19, 01-01-21, and 01-01-23 have been adjusted to reflect the smoothing of gains and/or losses over a 5-year averaging period. 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.

* The actuarial value of assets at 01-01-19, 01-01-21 and 01-01-23 include receivables from the township in the amounts of \$140,195, \$162,125, and \$168,176, respectively, for the outstanding pension obligations. Without these receivables, the funded ratios would be 35.1%, 22.7%, and 14.9%, respectively.

NORWEGIAN 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.

NORWEGIAN 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
2019	\$ 3,445	*
2020	3,445	*
2021	4,407	*
2022	4,407	100.0%
2023	5,914	*
2024	5,914	100.0%

* The township had an outstanding obligation due to the police pension plan for the year according to Act 205 as disclosed in the finding contained in this report and as noted in the Status of Prior Finding in this report. The total overall funding deficiency to the police pension plan as of December 31, 2024, amounted to \$187,424, with accumulated interest, according to the plan's actuary.

NORWEGIAN 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, 2023
Actuarial cost method	Entry age normal
Amortization method	Level dollar
Remaining amortization period	1 year
Asset valuation method	5-year smoothing
Actuarial assumptions:	
Investment rate of return	5.0%
Projected salary increases	3.5%

NORWEGIAN TOWNSHIP POLICE PENSION PLAN
REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Joshua D. Shapiro
Governor
Commonwealth of Pennsylvania

Mr. Dave George
Chairman, Board of Township Supervisors

Mr. Michael Miller
Office Manager

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.