COMPLIANCE AUDIT

Springfield Township Non-Uniformed Pension Plan

Mercer County, Pennsylvania

August 2025



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 Springfield Township Mercer County Mercer, PA 16137

We have conducted a compliance audit of the Springfield Township Non-Uniformed Pension Plan 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:

- For the period January 1, 2023 to December 31, 2024, 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. State aid allocations that were deposited towards the defined contribution features of the pension plan for the years ended December 31, 2023 to December 31, 2024, are presented on the Summary of Deposited State Aid and Employer Contributions.
- For the period January 1, 2023 to December 31, 2024, 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.
- For the period January 1, 2023 to December 31, 2024, we determined that there were no employee contributions required by the plan's governing document and applicable laws and regulations for the active member of the plan's defined benefit features. For the same period, 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 for the active member of the plan's defined contribution features by testing total members' contributions on an annual basis using the rates obtained from the plan's governing document in effect for the years in the period noted and examining documents evidencing the deposit of these employee contributions into the pension plan. We also tested individual employee contributions for both active employees of the plan's defined contribution features employed during the period noted amounting to \$9,581 and \$6,532, for the years 2023 and 2024, respectively.
- For the period January 1, 2023 to December 31, 2024, we determined that there were no benefit calculations prepared for members of the plan's defined benefit features. We also determined whether retirement benefits calculated for the members of the plan's defined contribution features who separated employment and received a lump-sum distribution during the period noted 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 benefits due to the retired individuals and comparing these amounts to supporting documentation evidencing amounts determined and actually paid to the recipients.
- We determined whether the January 1, 2023 actuarial valuation reports were prepared and submitted by March 31, 2024 in accordance with Act 205 and whether selected information provided on these reports are 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.

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

Township officials are responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the Springfield Township Non-Uniformed 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 Springfield Township Non-Uniformed Pension Plan was administered in compliance with applicable state laws, regulations, contracts, administrative procedures, and local ordinances and policies for the periods noted above, except as noted in the following finding further discussed later in this report:

Finding – Failure To Properly Fund Member's Account

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 Springfield 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.

Timothy L. DeFoor

Timothy L. Detool

Auditor General

August 1, 2025

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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 Springfield Township Non-Uniformed 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 Springfield Township Non-Uniformed Pension Plan is a single-employer defined benefit pension plan locally controlled by the provisions of Resolution No. 16-1994, as amended. The plan was established January 1, 1994. Active members are not required to contribute to the plan. As of December 31, 2024, the plan had one active member, one terminated member eligible for vested benefits in the future, and four retirees receiving pension benefits from the plan.

Effective January 1 2019, the township adopted Resolution No. 26 of 2018, as amended, which amended the non-uniformed pension plan to provide for defined contribution features for non-uniformed employees hired on or after January 1, 2019. Active members are required to contribute four percent of compensation to the plan. The municipality is required to contribute four percent of compensation. As of December 31, 2024, the plan had one active member.

SPRINGFIELD TOWNSHIP NON-UNIFORMED PENSION PLAN STATUS OF PRIOR FINDING

Compliance With Prior Recommendation

Springfield Township has complied with the prior recommendation concerning the following:

· Incorrect Data On Certification Form AG 385 Resulting In An Overpayment Of State Aid

On October 27, 2020, the township reimbursed \$3,629 to the Commonwealth for the overpayment of state aid received in 2019, plus interest.

SPRINGFIELD TOWNSHIP NON-UNIFORMED PENSION PLAN FINDING AND RECOMMENDATION

<u>Finding – Failure To Properly Fund Member's Account</u>

<u>Condition</u>: In 2024, the township contributed \$888 to the account of a member of the defined contribution features of the plan who terminated employment during the year and therefore did not meet the eligibility requirements for a pension contribution for that year.

<u>Criteria</u>: Section C.2c of the separately executed plan agreement enacted by Resolution No. 26 of 2018, states, in part:

In order to share in the allocation of Pension Contributions, a Participant is required to be employed by the Employer on the last day of the Plan Year.

Section C.7a states:

Pension Contributions are allocated to Participant Accounts at the end of the Plan Year.

Section A.4a states:

Plan Year means each 12-consecutive month period ending on December 31.

<u>Cause</u>: Plan officials were unaware of the eligibility requirements for a pension contribution in the employee's year of termination.

<u>Effect</u>: The employee terminated employment in June 2024 and was not vested in their account balance, pursuant to the pension plan's vesting schedule. The employee's forfeited account balance was appropriately moved to a suspense account in accordance with plan provisions, which require a forfeited account balance to be restored and continue to vest if the period of severance is less than or equal to five years, and thereafter the forfeiture can be used to reduce employer contributions or pay plan expenses. However, the \$888 contribution in 2024, which was made using 2024 state aid money, should not have been made to the member's account and, therefore, should not be part of the forfeited account balance held in the suspense account.

Because the improperly made contribution is comprised of state aid money, and state aid must be utilized for pension costs for the year in which the state aid was received, the \$888 must be withdrawn from the suspense account and reallocated to the accounts associated with the defined benefit plan features.

SPRINGFIELD TOWNSHIP NON-UNIFORMED PENSION PLAN FINDING AND RECOMMENDATION

Finding – (Continued)

<u>Recommendation</u>: We recommend that municipal officials reallocate \$888 to the township's defined benefit plan account.

We also recommend that plan officials implement adequate internal control procedures to ensure that members' accounts are properly funded in the future in accordance with the provisions contained in the plan's governing document.

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

Auditor's Conclusion: Compliance will be evaluated during our next audit of the plan.

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

SCHEDULE OF FUNDING PROGRESS

DEFINED BENEFIT PLAN

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)
			Unfunded	
		Actuarial	(Assets in	
		Accrued	Accrued Excess of)	
	Actuarial	Liability	Actuarial	
Actuarial	Value of	(AAL) -	Accrued	Funded
Valuation	Assets	Entry Age	Liability	Ratio
Date	(a)	(b)	(b) - (a)	(a)/(b)
01-01-19	\$ 394,285	\$ 424,182	\$ 29,897	93.0%
01-01-21	494,610	456,248	(38,362)	108.4%
01-01-23	488,090	459,681	(28,409)	106.2%

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 four-year averaging period subject to a corridor between 80 and 120 percent of the market value of assets. 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.

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

DEFINED BENEFIT PLAN

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.

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

SCHEDULE OF CONTRIBUTIONS

DEFINED BENEFIT PLAN

									Contributions as a Percentage
	Act	tuarially			Con	tribution	C	lovered-	of Covered-
Year Ended	Det	ermined	1	Actual	Def	ficiency	\mathbf{E}	mployee	Employee
December 31	Con	tribution	Con	tributions	(E	xcess)		Payroll	Payroll
	_		_		_		_		
2015	\$	24,477	\$	24,477	\$	-	\$	151,504	16.2%
2016		22,747		22,747		-		151,160	15.1%
2017		21,550		21,550		-		147,390	14.6%
2018		15,764		15,764		-		123,291	12.8%
2019		15,113		15,113		-		105,212	14.4%
2020		9,760		9,760		-		104,027	9.4%
2021		9,507		9,507		-		77,855	12.2%
2022		3,487		3,487		-		64,480	5.4%
2023		3,758		3,758		-		*	
2024		3,745		3,745		-		*	

^{*} Due to the timing of this audit, covered-employee payroll for 2023 and 2024 was not provided in this schedule.

SPRINGFIELD TOWNSHIP NON-UNIFORMED PENSION PLAN SUPPLEMENTARY INFORMATION NOTES TO SUPPLEMENTARY SCHEDULES (UNAUDITED)

DEFINED BENEFIT PLAN

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 Not applicable

Remaining amortization period None

Asset valuation method 4 year smoothing – subject to a

corridor of 80% to 120% of the

market value of assets.

Actuarial assumptions:

Investment rate of return 7.0%

Projected salary increases 4.0%

SPRINGFIELD TOWNSHIP NON-UNIFORMED PENSION PLAN SUMMARY OF DEPOSITED STATE AID AND EMPLOYER CONTRIBUTIONS (UNAUDITED)

DEFINED CONTRIBUTION PLAN

Year Ended December 31	State Aid	Employer Contributions		
2023	\$ 4,344	None		
2024	3,645	None		

The Department typically presents this data for the past six consecutive fiscal years. Since six years of data was not yet available, this will be done prospectively.

SPRINGFIELD TOWNSHIP NON-UNIFORMED PENSION PLAN REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

The Honorable Joshua D. Shapiro

Governor Commonwealth of Pennsylvania

Mr. Marcus Kohan

Chairman, Board of Township Supervisors

Ms. Lucinda G. Lipko

Township Administrator

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.