

April 30, 2024

Mr. Robert Miracle Deputy Town Manager Town of Palm Beach 360 S. County Road Palm Beach, Florida 33480

Re: Town of Palm Beach Retirement System – Actuarial Impact Statement for Police Officers

Dear Bob:

As requested, we have reviewed the proposed Ordinance which amends Section 82-119, *Deferred retirement option program for police officers*, of the Town's Code of Ordinances with regard to the Town of Palm Beach Retirement System (Plan). We are enclosing an Actuarial Impact Statement showing the impact of the proposed change in Plan provisions on the September 30, 2023 actuarial valuation results for Police Officers.

Please refer to the enclosed exhibits for details. The following is a brief description of the proposed change included in this Actuarial Impact Statement:

- ➤ Current Plan Same plan provisions as described in the September 30, 2023 Actuarial Valuation Report. For any Police Officer who is appointed town manager while participating in the Deferred Retirement Option Program (DROP), the maximum participation period in the DROP is 120 months (10 years).
- ➤ Plan Change For any Police Officer who is appointed town manager while participating in the DROP, the maximum participation period in the DROP is 144 months (12 years).

## **Summary of Findings**

Pension benefits under this Plan are limited by IRC Section 415(b). The 415(b) limitation on annual benefits must be reduced to account for DROP distributions at DROP exit. Future pension benefits which are in excess of the adjusted annual 415(b) limit cannot be paid from this plan and instead will need to be paid from the Preservation of Benefits (Excess) Plan. As a result, the impact of the above Plan Change depends on how long the Town Manager remains in the DROP (and on how large his DROP account balance is at retirement). The enclosed exhibits present results which assume the Town Manager remains in the DROP for 12 years.

- As a result of the Plan change, the required employer contribution rate for Police Officers decreases by 0.70% of covered payroll (from 81.44% to 80.74%), or a total dollar amount of \$37,878 for the fiscal year ending September 30, 2025 (assuming October 1<sup>st</sup> payment timing), assuming the Town Manager participates in the DROP for the maximum 12-year period and his DROP balance earns an average investment return of 6.5% per year.
- ➤ As a result of the Plan change, the funded ratio (actuarial value of assets divided by actuarial accrued liability) for Police Officers increases by 0.3%, from 75.2% to 75.5%, assuming the Town Manager participates in the DROP for the maximum 12-year period. Under this scenario, the unfunded liability decreases by \$449,998.

Please note that as of September 30, 2023, there is currently one Police Officer who is an appointed Town Manager and is participating in the DROP. Under current plan provisions, this member's benefit is projected to be in excess of the 415(b) limit when he exits the DROP. No other members are expected to be affected by this proposed Ordinance in the foreseeable future. However, if other members become affected in future years, the impact of the plan changes would be greater than presented above.

It should be noted that the current Town Manager is not the only member in the Plan who is impacted by the 415(b) limits. Also, the stricter limitation on the amount of benefits payable from the Plan due to the proposed DROP extension does not increase or decrease the future annual retirement benefits payable to the current Town Manager from a combination of the Town of Palm Beach Retirement System and the Preservation of Benefits (Excess) Plan – it just shifts the source of future payments.

We have projected the DROP account balance for the affected Police Officer assuming investment earnings in the DROP accrue at a rate of 6.5% per annum. The amount of the DROP distribution is converted to an equivalent annuity, and that amount is used to reduce the limit on future benefits paid from the Town of Palm Beach Retirement System. If actual average DROP account investment earning are higher than 6.5%, the resulting adjusted annual 415(b) limit at DROP exit will be lower and more benefits will be payable from the Excess Plan. We have also projected IRC Section 415 limits into the future assuming annual inflation increases will be 2.0% per year and there will be no changes in the applicable prescribed mortality and segment interest rate assumptions after 2023. Actual published 415(b) limits and applicable segment interest rates and mortality tables will need to be taken into account at retirement.

The present values shown herein are based on the interest rate of 6.20% and mortality assumptions used in the September 30, 2023 valuation. If a lower interest rate or higher life expectancy assumption was used, the present values shown would be higher.

Risk assessment may include scenario, sensitivity, or stress tests, stochastic modeling, and a comparison of the present value of benefits at low-risk discount rates. We are prepared to perform such assessment to aid the Town in the decision making process. Please refer to the September 30, 2023 Actuarial Valuation Report dated March 11, 2024 for additional discussion regarding the risks associated with measuring the accrued lability and actuarially determined contribution.

### **Additional Disclosures**

This report was prepared at the request of the Town of Palm Beach and is intended for use by the Town of Palm Beach and the Retirement System and those designated or approved by the Town or the System. This report may be provided to parties other than the System only in its entirety and only with the permission of the Town or Board of Trustees.

The purpose of this report is to describe the expected immediate financial effect of the proposed plan change. This report should not be relied on for any purpose other than the purpose described above.



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This report complements the September 30, 2023 Actuarial Valuation Report previously delivered to the Plan Administrator and the Town and should be considered in conjunction with that report. The results in this report are based on census and asset data as of September 30, 2023, as provided by the Town for the September 30, 2023 Actuarial Valuation concerning Plan benefits, financial transactions, plan provisions and active members, terminated members, retirees and beneficiaries. We reviewed this information for internal and year-to-year consistency, but did not otherwise audit the data. We are not responsible for the accuracy or completeness of the information provided by the Town. Refer to the September 30, 2023 Actuarial Valuation report, dated March 11, 2024, for all actuarial assumptions, methods and disclosures.

The calculations were prepared based on our interpretation of the Retirement System Ordinance, and on what we believe are reasonable approaches to testing benefits under IRC Section 415(b) and the final regulations. We have also assumed that there are no System actuarial equivalence factors for converting the DROP account balance to an equivalent single life annuity because "actuarial equivalent" is not defined in the System Ordinance. However, we are neither tax attorneys nor tax professionals and the above information should not be construed as legal or income tax advice or opinion. There is no guarantee that the IRS would agree with the approaches used. If there is any doubt about these points, legal counsel should be consulted.

The calculations are based upon assumptions regarding future events, which may or may not materialize. They are also based on the assumptions, methods, and plan provisions outlined in this report. Future actuarial measurements may differ significantly from the current measurements presented in this report due to such factors as the following: plan experience differing from that anticipated by the economic or demographic assumptions; changes in economic or demographic assumptions; increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the plan's funded status); and changes in plan provisions or applicable law. If you have reason to believe that the assumptions that were used are unreasonable, that the plan provisions are incorrectly described, that important plan provisions relevant to this proposal are not described, or that conditions have changed since the calculations were made, you should contact the author of the report prior to relying on information in the report.

This report has been prepared by actuaries who have substantial experience valuing public employee retirement systems. To the best of our knowledge the information contained in this report is accurate and fairly presents the actuarial position of the Town of Palm Beach Retirement System as of the valuation date. All calculations have been made in conformity with generally accepted actuarial principles and practices, and with the Actuarial Standards of Practice issued by the Actuarial Standards Board and with applicable statutes.

Peter N. Strong and Jeffrey Amrose are members of the American Academy of Actuaries and meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinions contained herein. The signing actuaries are independent of the plan sponsor.



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Respectfully submitted,

Peter N. Strong, FSA, MAAA, FCA Enrolled Actuary No. 23-06975

Jeffrey Amrose, MAAA, FCA Enrolled Actuary No. 23-06599



# TOWN OF PALM BEACH RETIREMENT SYSTEM POLICE OFFICERS

## Impact Statement – April 30, 2024

# **Description of Amendments**

The proposed Ordinance amends the Plan as follows:

• For any Police Officer who is appointed town manager while participating in the DROP, the maximum participation period in the DROP is 144 months (12 years).

# **Funding Implications of Amendment**

An actuarial cost estimate is attached.

#### **Certification of Administrator**

I believe the amendment to be in compliance with Part VII, Chapter 112, Florida Statutes and Section 14, Article X of the Constitution of the State of Florida.

For the Board of Trustees as Plan Administrator

#### SUPPLEMENTAL ACTUARIAL VALUATION REPORT

#### Plan

Town of Palm Beach Retirement System – Police Officers

#### **Valuation Date**

September 30, 2023

#### **Date of Report**

April 30, 2024

#### Report Requested by

**Board of Trustees** 

#### Prepared by

Peter N. Strong

## **Group Valued**

All active and inactive Police Officers

## **Change in Plan Provisions**

## Present Provision Before Change

For any Police Officer who is appointed Town Manager while participating in the Deferred Retirement Option Program (DROP), the maximum participation period in the DROP is 120 months (10 years).

# Proposed Provision After Change

For any Police Officer who is appointed Town Manager while participating in the DROP, the maximum participation period in the DROP is 144 months (12 years). To value this change, the assumed DROP participation period for the Town Manager was increased from 10 years to 12 years.

## **Changes in Actuarial Assumptions and Methods**

With the exception of the assumption change described above (the change in the assumed DROP participation period for the Town Manager from 10 years to 12 years), all other actuarial assumptions and methods are the same as those used in the September 30, 2023 Actuarial Valuation Report.

Some of the key assumptions/methods are:

Investment Return – 6.20% per year

Payroll Growth Assumption - 2.75% per year

Internal Revenue Code (IRC) Section 415 Limitation – IRC Section 415 limits are projected into the future assuming annual inflation increases of 2.0% per year and no changes in the

applicable prescribed mortality assumptions. For the purposes of valuing the liability for applicable Plan members whose benefits are currently limited under IRC Section 415 and who are currently in the DROP, monthly benefit payments and investment earnings will continue to accumulate in the DROP until the assumed DROP exit date. Investment earnings in the DROP are projected to be 6.5% per year for this purpose. The projected DROP distribution is then converted to an equivalent annuity, and that amount is used to reduce the limit on future benefits paid from the System.

## **Amortization Period for New Changes in Actuarial Accrued Liability**

15 years (for changes in plan provisions).

## **Actuarial Impact of Changes**

See attached page(s).

Special Risks Involved with the Changes That the Plan Has Not Been Exposed to Previously
None

ACTUARIALLY DETERMINED CONTRIBUTION (ADC)								
A. Valuation Date	September 30, 20	September 30, 202						
	Police Officers Valuation		Police Officers Plan Change	Change				
B. ADC to Be Paid During Fiscal Year Ending	9/30/2025		9/30/2025					
C. Covered Annual Payroll (expected)	\$ 5,571,117		\$ 5,571,117		\$	0		
D. Annual Payment to Amortize Unfunded Actuarial Liability Rate As Illutrative \$	61.27 3,413,423		60.57 3,374,426	%		(0.70) (38,997)		
E. Total Employer Normal Cost Rate As Illustrative \$	20.17 1,123,694		20.17 1,123,694	%		0.00	%	
F. Total Unadjusted Contribution Rate Employer Normal Cost Amortization Total	20.17 <u>61.27</u> 81.44		20.17 <u>60.57</u> 80.74	%		0.00 (0.70) (0.70)		
G. Adjustments to Computed Contribution a. Town funding for additional premium tax revenue shortfall in prior fiscal year b. Additional Member Cost Sharing c. Full funding credit d. Total Adjustments As Illustrative \$	0.00 0.00 <u>0.00</u> 0.00		0.00 0.00 <u>0.00</u> 0.00	%		0.00 0.00 <u>0.00</u> 0.00	%	
H. Total Adjusted ADC as % of Covered Payroll	81.44	%	80.74	%		(0.70)	%	
I. Total Adjusted ADC as Illustrative \$	\$ 4,537,117		\$ 4,498,120		\$	(38,997)		
J. Total Adjusted ADC if Contributed October 1st	\$ 4,406,838		\$ 4,368,960		\$	(37,878)		

ACTUARIAL VALUE OF BENEFITS AND ASSETS						
A. Valuation Date	September 30, 2023  Police Officers	September 30, 2023  Police Officers				
B. Actuarial Present Value of All Projected     Benefits for     1. Active Members	Valuation	Plan Change	Change			
a. Service Retirement Benefits b. Vesting Benefits c. Disability Benefits d. Preretirement Death Benefits e. Return of Member Contributions f. Total	\$ 25,981,259 1,160,786 1,155,309 463,866 238,544 28,999,764	\$ 25,981,259 1,160,786 1,155,309 463,866 238,544 28,999,764	\$ - - - - - -			
<ol> <li>Inactive Members         <ul> <li>a. Retired Members &amp; Beneficiaries</li> <li>b. Terminated Vested Members</li> <li>c. DROP and Share Account Balances</li> <li>d. Total</li> </ul> </li> </ol>	97,107,213 4,108,278 3,466,326 104,681,817	96,657,215 4,108,278 3,466,326 104,231,819	(449,998) - - - (449,998)			
3. Total for All Members	133,681,581	133,231,583	(449,998)			
C. Actuarial Present Value of Future Normal Costs	15,216,734	15,216,734	-			
D. Actuarial Accrued (Past Service) Liability	118,464,847	118,014,849	(449,998)			
E. Plan Assets 1. Market Value 2. Actuarial Value	81,920,847 89,135,074	81,920,847 89,135,074	-			
F. Unfunded Actuarial Accrued Liability:	29,329,773	28,879,775	(449,998)			
G. Funded Ratio: E2/D	75.2 %	75.5 %	0.3 %			
H. Actuarial Present Value of Projected Covered Payroll	57,073,356	57,073,356	-			
Actuarial Present Value of Projected     Member Contributions	4,851,236	4,851,236	-			
J. Accumulated Value of Active Member Contributions	2,796,126	2,796,126	-			

CALCULATION OF EMPLOYER NORMAL COST										
A. Valuation Date	September 30, 2023			September 30, 2023						
B. Normal Cost for		Police Officers Valuation			Police Officers Plan Change			Change		
S. Norma. 3331 is:										
1. Service Retirement Benefits	\$	1,158,120	21.91%	\$	1,158,120	21.91%	\$	-	0.00%	
2. Vesting Benefits		61,549	1.16%		61,549	1.16%		-	0.00%	
3. Disability Benefits		86,299	1.63%		86,299	1.63%		-	0.00%	
4. Preretirement Death Benefits		37,111	0.71%		37,111	0.71%		-	0.00%	
5. Return of Member Contributions	l _	47,548	0.90%	_	47,548	0.90%	l _	-	0.00%	
6. Total for Future Benefits		1,390,627	26.31%		1,390,627	26.31%		-	0.00%	
7. Assumed Amount for										
Administrative Expenses	۱ ـ	124,758	2.36%	١.	124,758	2.36%	l _	-	0.00%	
8. Total Normal Cost		1,515,385	28.67%		1,515,385	28.67%		-	0.00%	
C. Expected Member Contribution		449,342	8.50%		449,342	8.50%		-	0.00%	
D. Employer Normal Cost: B8-C		1,066,043	20.17%		1,066,043	20.17%		-	0.00%	
E. Employer Normal Cost as a % of Covered Payroll		20.17	%		20.17	%		0.00	%	

PARTICIPANT DATA								
	September 30, 2023  Police Officers  Valuation		F	ember 30, 2023 Police Officers Plan Change				
ACTIVE MEMBERS								
Number Covered Annual Payroll Average Annual Payroll Average Age Average Past Service Average Age at Hire	\$ \$	59 5,348,964 90,660 39.4 7.4 32.0	\$	59 5,348,964 90,660 39.4 7.4 32.0				
RETIREES, BENEFICIARIES & DROP								
Number Annual Benefits Average Annual Benefit Average Age	\$ \$	104 6,663,210 64,069 67.0	\$ \$	104 6,663,210 64,069 67.0				
DISABILITY RETIREES								
Number Annual Benefits Average Annual Benefit Average Age	\$ \$	4 179,974 44,994 56.3	\$ \$	4 179,974 44,994 56.3				
TERMINATED VESTED MEMBERS								
Number Annual Benefits Average Annual Benefit Average Age	\$ \$	21 300,139 14,292 48.5	\$	21 300,139 14,292 48.5				