

PEYTON FIRE PROTECTION DISTRICT
PENSION BOARD MEETING

Administrative Offices

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Lakewood, Colorado 80228-1898
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NOTICE OF REGULAR MEETING AND AGENDA

| <u>Board of Directors:</u> | <u>Office:</u> | <u>Term/Expires:</u> |
|----------------------------|----------------|----------------------|
| Clayton Miller | Director | 2023/May 2023 |
| Amy Turner | Treasurer | 2025/May 2023 |
| David Rolenc | President | 2023/May 2023 |
| Ryan Orness | Director | 2023/May 2023 |
| VACANT | Director | 2025/May 2023 |
| Jeff Turner | Fire Chief | |
| Michael Dell'Ario | Secretary | |

DATE: August 9, 2022 (Tuesday)

TIME: 6:30 p.m.

PLACE: ***Physical Location***
Peyton Fire Protection District
13665 Railroad Street
Peyton, CO 80831

Conference Call
Telephone Number: 1 669 900 6833
Meeting ID: 546 911 9353
Passcode: 912873

I. ADMINISTRATIVE MATTERS

A. Present Disclosures of Potential Conflicts of Interest.

B. Approve Agenda.

C. Review and approve the Minutes from the May 10, 2022 Pension Board Meeting (enclosure).

II. PUBLIC COMMENT

A. _____

III. CORRESPONDENCE

A. _____

IV. UNFINISHED BUSINESS

A. _____

V. NEW BUSINESS

A. Review and accept 2021 Fourth Quarter Financial Report (enclosure).

B. Review and accept 2022 First Quarter Financial Report (enclosure).

A. Review the FPPA Auditor's Report from EideBailly, dated December 31, 2021 (enclosure).

VI. OTHER BUSINESS

A. _____

VII. ADJOURNMENT **RECONVENE TO THE PEYTON FIRE PROTECTION DISTRICT BOARD MEETING.**

RECORD OF PROCEEDINGS

MINUTES OF A REGULAR MEETING OF THE BOARD OF DIRECTORS OF THE PEYTON FIRE PROTECTION DISTRICT PENSION BOARD MEETING HELD MAY 10, 2022

A Regular Meeting of the Board of Directors of the Peyton Fire Protection District Pension Board (referred to hereafter as “Board”) was held on Tuesday, the 10th day of May, 2022 at 6:30 p.m. at the Peyton Fire Protection District Fire Station, 13665 Railroad Street, Peyton, Colorado 80831 and was also held by conference call. The meeting was open to the public.

ATTENDANCE

Directors In Attendance Were:

Clayton Miller
David Rolenc
Ryan Orness
Jeff Turner (for a portion of the meeting)
Michael Dell’Ario

Also In Attendance Were:

David Solin; Special District Management Services, Inc. (“SDMS”)

Jack Reutzler, Esq.; Fairfield & Woods, P.C.

Assistant Chief Oakley Revels

Vicki Revels; Firefighter

John Hill; Ranchland News

DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST

Disclosure of Potential Conflicts of Interest: The Board discussed the requirements pursuant to the Colorado Revised Statutes to disclose any potential conflicts of interest or potential breaches of fiduciary duty to the Board of Directors and to the Secretary of State. Mr. Solin noted that there were no new conflicts of interest raised.

ADMINISTRATIVE MATTERS

Agenda: Mr. Solin reviewed the proposed agenda for the Pension Board’s Regular Meeting.

RECORD OF PROCEEDINGS

Following discussion, upon motion duly made by Director Dell’Ario, seconded by Director Rolenc and, upon vote, unanimously carried, the Agenda was approved, as presented.

Appointment of Director: The Board considered the appointment of Amy Turner to fill the vacancy on the Board of Directors.

Following discussion, upon motion duly made by Director Dell’Ario, seconded by Director Miller and, upon vote, unanimously carried, Amy Turner was appointed to the Board of Directors.

Appointment of Officers: The Board entered into discussion regarding the appointment of officers.

Following discussion, upon motion duly made by Director Dell’Ario, seconded by Director J. Turner and, upon vote, unanimously carried, the following slate of officers was appointed:

| | |
|------------|-------------------|
| President | David Rolenc |
| Treasurer | Amy Turner |
| Director | Clayton Miller |
| Director | Ryan Orness |
| Fire Chief | Jeff Turner |
| Secretary | Michael Dell’Ario |

Minutes: The Board reviewed Minutes from the February 8, 2022 Pension Board Meeting.

Following discussion, upon motion duly made by Director Dell’Ario, seconded by Director J. Turner and, upon vote, unanimously carried, the Minutes of the February 8, 2022 Pension Board Meeting were approved, as presented.

PUBLIC COMMENT There was no public comment.

CORRESPONDENCE There was no correspondence.

UNFINISHED BUSINESS There was no unfinished business.

RECORD OF PROCEEDINGS

NEW BUSINESS

2021 Fourth Quarter Financial Report: Mr. Solin presented, and the Board discussed, the 2021 fourth quarter financial report. No action was taken, pending clarification on prior losses.

OTHER BUSINESS

There was no other business.

ADJOURNMENT

The meeting was adjourned as there were no other business matters before the Board.

Respectfully submitted,

By: /s/ Michael Dell'Ario
Secretary for the Meeting

THESE MINUTES ARE APPROVED AS THE OFFICIAL MAY 10, 2022 MEETING MINUTES OF THE PEYTON FIRE PROTECTION DISTRICT PENSION BOARD BY THE BOARD OF DIRECTORS SIGNING BELOW:

Clayton Miller

Jeff Turner

Michael Dell'Ario

Amy Turner

David Rolenc

Ryan Orness

PEYTON FIRE PROTECTION DISTRICT
PENSION TRUST FUND
BALANCE SHEET
DECEMBER 31, 2021

| | | | |
|-------------------------------|---------------------------------|--------------|------------|
| <u>ASSETS</u> | | | |
| 4-118 | FPPA PENSION FUND | 101,466.01 | |
| | | | |
| | TOTAL ASSETS | | 101,466.01 |
| <u>LIABILITIES AND EQUITY</u> | | | |
| <u>FUND EQUITY</u> | | | |
| 4-450 | FUND BALANCE | 146,345.49 | |
| | UNAPPROPRIATED FUND BALANCE: | | |
| 4-497 | CURRENT EARNINGS | (60,318.84) | |
| | REVENUE OVER EXPENDITURES - YTD | 15,439.36 | |
| | | | |
| | BALANCE - CURRENT DATE | (44,879.48) | |
| | | | |
| | TOTAL FUND EQUITY | | 101,466.01 |
| | TOTAL LIABILITIES AND EQUITY | | 101,466.01 |

PEYTON FIRE PROTECTION DISTRICT
PENSION TRUST FUND
STATEMENT OF REVENUE AND EXPENDITURES COMPARED TO BUDGET
FOR THE 12 MONTHS ENDING DECEMBER 31, 2021

| | PERIOD ACTUAL | YTD ACTUAL | BUDGET | VARIANCE | PCNT |
|---|---------------|------------|--------|--------------|------|
| <u>REVENUE</u> | | | | | |
| 4-545 STATE CONTRIBUTION | 8,280.00 | 8,280.00 | .00 | (8,280.00) | .0 |
| 4-560 INVESTMENT INCOME | 361.46 | 685.04 | .00 | (685.04) | .0 |
| 4-561 UNREALIZED GAIN OR (LOSS) | 632.24 | 5,179.20 | .00 | (5,179.20) | .0 |
| 4-565 REALIZED GAIN OR (LOSS) | 3,861.06 | 7,126.58 | .00 | (7,126.58) | .0 |
| 4-570 ACCRUED INCOME | (9.69) | (2.39) | .00 | 2.39 | .0 |
| 4-575 OTHER INCOME (LOSS) | 119.81 | 274.34 | .00 | (274.34) | .0 |
| | | | | | |
| TOTAL REVENUE | 13,244.88 | 21,542.77 | .00 | (21,542.77) | .0 |
| <u>EXPENSES</u> | | | | | |
| 4-610 PENSION FUND EXPENSES | 2,519.88 | 4,603.41 | .00 | (4,603.41) | .0 |
| 4-615 PAYMENTS TO PARTICIPANTS | .00 | 1,500.00 | .00 | (1,500.00) | .0 |
| | | | | | |
| TOTAL EXPENSES | 2,519.88 | 6,103.41 | .00 | (6,103.41) | .0 |
| | | | | | |
| EXCESS REVENUE OVER (UNDER) EXPENDITURES | 10,725.00 | 15,439.36 | .00 | (15,439.36) | .0 |
| | | | | | |
| FUND BALANCE - ENDING | 10,725.00 | 15,439.36 | .00 | (15,439.36) | .0 |

Fire and Police Pension Association
Peyton FPD Volunteers 7281-5
For the Twelve Months Ending December 31, 2021

| | |
|--|--------------|
| Beginning Balance | \$86,026.65 |
| Plan Direct Inflows and Outflows | |
| Member Contributions | |
| Employer Contributions | |
| Contributions from the SWDD Plan | |
| Refunds | |
| Affiliations/(Disaffiliations) | |
| Plan Transfers | |
| Net Benefits | (\$1,500.00) |
| Plan Directed Expenses | |
| State Funding | \$8,280.00 |
| Plan Direct Inflows and Outflows Sub-Total | \$6,780.00 |
| Allocated Income and Expense | |
| Interest | \$245.49 |
| Dividends | \$439.55 |
| Other Income | \$274.34 |
| Net Change Accrued Income | (\$2.39) |
| Unrealized Gain/Loss | \$5,179.20 |
| Realized Gain/Loss | \$7,126.58 |
| Defined Contribution Earnings (Net) | |
| Investment Expenses | (\$745.81) |
| Direct Expense Allocation | (\$1,274.22) |
| Other Expenses | (\$2,583.38) |
| Allocated Income and Expense Sub-Total | \$8,659.36 |
| Ending Balance | \$101,466.01 |

Fire and Police Pension Association

Volunteer Fire Pension Plan Contributions PEYTON FPD 7281-5

For the Reporting Period: 01/01/2021 through 12/31/2021

| Deposit Date | Employer Contributions | State Matching Funds | Total Remittance |
|---|-----------------------------------|---------------------------------|-----------------------------|
| 11/23/2021 | \$0.00 | \$8,280.00 | \$8,280.00 |
| Total Remittance | | | \$8,280.00 |
| Calculated Contribution per the 01/01/2019 Actuarial Study | | | \$2,357.00 |
| Difference Over/(Under) | | | \$5,923.00 |

Note: The Calculated Contribution amount is due to FPPA before 12/31/2021

**Fire and Police Pension Association
Direct Expense Allocation Summary
Peyton FPD Volunteers 7281-5
For the Twelve Months Ending December 31, 2021**

| Type of Expense | 2021 Budget | Year-to-Date Expenses | Payment of 2021 Expenses |
|---|-------------------|--------------------------|-----------------------------|
| Actuarial Expenses | \$1,116.60 | \$1,116.60 | |
| Audit Expenses | \$146.43 | \$157.62 | |
| Other Asset Allocation Study Expenses | | | |
| Total Direct Allocated Expenses & Payments | \$1,263.03 | \$1,274.22 | |

Actuarial expenses may exceed the budget related to asset allocation studies and implementation.

Contact Peggy Job at 720-479-2345 to obtain a detailed expense listing.

MEMORANDUM

To: Affiliated FPPA Volunteer Pension Plan Employers
From: Peggy Job, Senior Accountant
Re: Year Ended December 31, 2021
 Allocation Report, Annual Contributions Received & Direct Expense Allocation Summary
Date: February 23, 2022

Allocation Report

Investment Performance

Your plan assets are commingled for investment purposes in the Members' Benefit Investment Fund – Long Term Pool ("Pool"). Returns for the Pool are as follows (returns for periods longer than one year are annualized):

| As of 12/31/2021 | Quarter | Year to Date | 1 Year | 3 Years | 5 Years |
|---------------------------------------|---------|--------------|--------|---------|---------|
| Total Pool Net of Investment Expense* | 3.45% | 15.17% | 15.17% | 14.50% | 11.55% |

*FPPA Administrative Expenses are not included in the Total Pool Net of Investment Expense percentages.

The table below summarizes expenses as a percentage of net assets for the Pool:

| Year | FPPA Administrative Expense* | Investment Management Expense | Total Expense Ratio |
|------|------------------------------|-------------------------------|---------------------|
| 2021 | 0.12% | 0.81% | 0.93% |
| 2020 | 0.13% | 0.79% | 0.92% |
| 2019 | 0.13% | 0.80% | 0.93% |
| 2018 | 0.16% | 0.88% | 1.04% |
| 2017 | 0.23% | 0.89% | 1.12% |
| 2016 | 0.24% | 0.79% | 1.03% |

How to Calculate Your Plan Specific Expense Ratio

Your Allocation Report may reflect expenses specific to your plan such as actuarial expense and legal fees as well as expenses you directed FPPA to pay from your plan assets. These expenses are reflected in the line items *Plan Directed Expenses* and *Direct Expense Allocation*. As such, your plan's administrative expenses may differ from the Pool. In order to calculate your plan's administrative expense ratio, you will need to add the line items *Plan Directed Expenses*, *Direct Expense Allocation* and *Allocated Fees & Expenses* and divide by the *Ending Balance*.

Allocation Methodology

Investment Expenses and *Allocated Fees & Expenses* are separately allocated and separately reported in the Allocation Report. The *Investment Expenses* are allocated to each plan based on the plan's proportion of total assets. The *Allocated Fees & Expenses* are allocated based on the plan's proportion of total membership, including active, inactive and retired members as of December 31 of the prior year as defined by the guidelines within the Comprehensive Annual Financial Report. Member counts may be adjusted during the year for plan affiliation, disaffiliation, or reentry.

Review of the Report

Review the items *Member Contributions*, *Employer Contributions*, *Refunds*, *Affiliations*, *Net Benefits*, *Plan Directed Expenses* and *State Funding* and confirm that these amounts are correct year-to-date. **If any**

amount is not correct, please send a written response to FPPA by April 15, 2022. If FPPA does not receive a response by April 15, 2022, you are confirming that these report items are correct.

Annual Contributions Received

FPPA provides a schedule of your 2021 contributions received by FPPA year to date. This schedule compares contributions received in the current year to the actuarial required contributions for 2021. **Please be aware that this report shows contributions based on the date received by FPPA and does not consider if contributions relate to a prior year.** All required contributions were due to FPPA before December 31, 2021 to be included in this report.

Direct Expense Allocation Summary

Direct Expense Allocation

FPPA provides a summary of expenses directly allocated to your plan, payments received related to these expenses and the related annual budgeted amounts. These costs are identified as direct plan expenses and are charged directly to the plan as a reduction of plan assets. They are reflected in the *Direct Expense Allocation* row of your Allocation Report. You may contact me to request a detailed summary of these allocated expenses.

The direct expense allocation is comprised of costs for audit and actuarial services. The audit services relate to the SOC 1 Type 2 report over the operating effectiveness of FPPA's controls for processing data and transactions related to your plan. The SOC 1 Type 2 report has been provided since 2014 to assist employers in reporting in accordance with Governmental Accounting Standards Board Statement No. 68 (GASB 68), *Accounting and Financial Reporting for Pensions*. Actuarial services include the biennial funding valuation report (issued in odd years for Volunteer Firefighter plans and even years for Old Hire plans) and the annual GASB 68 report. Actuarial services are provided by Gabriel Roeder Smith & Co. Audit services are provided by Eide Bailly LLP.

The Colorado Revised Statutes allow FPPA to allocate expenses that are directly related to the administration of the local affiliated plans from those plan's assets. For additional information, please see C.R.S. 31-31-701(7)(a)(VI) for old hire plans and C.R.S. 31-31-705(2)(f) for volunteer fire plans.

Payment of Settlor Expenses

Please discuss these direct plan expenses with your legal counsel to determine if they are a "settlor" expense. The Department of Labor believes that the employer should bear the cost of settlor expenses. If you agree, you should reimburse the plan for these expenses. This payment is in addition to any employer contributions made to the plan or as determined by the actuary (the actuarially determined contribution).

To reimburse the plan for these costs, please send payment via ACH or wire to FPPA. These payments need to be identified separately from your actuarial required contribution in order to net out the expense. Please contact FPPA for ACH or wire Instructions.

If you have any questions regarding your allocation report or the direct allocated plan expenses, please call me at 303-770-3772 in Metro Denver or 800-332-3772 or email me at pjob@fppaco.org.

Allocation Report Descriptions

This report provides the beginning of year plan balance, year-to-date totals, and an ending plan balance as of the report date

| | |
|---|---|
| Beginning Balance | Plan assets at the beginning of the year |
| Plan Direct Inflows and Outflows | |
| Member Contributions | Member Contributions made to the plan |
| Employer Contributions | Employer Contributions made to the plan |
| Contributions from the SWDD Plan | Contributions received for a member on disability rolling to a normal retirement |
| Refunds | Member withdrawal of funds from the plan |
| Affiliations/(Disaffiliations) | Plan affiliation or disaffiliation or idle funds distribution (typically a Volunteer Fire Plan matter) |
| Net Benefits | Benefits paid to retired members |
| Plan Directed Expenses | Payments from plan assets directed by the department Examples: legal, actuarial, and insurance expense |
| State Funding | State funding for volunteer plans |
| Plan Direct Inflows and Outflows Sub-Total | Sub-Total of the above activity |
| Allocated Income and Expense | |
| Interest* | Interest on investments |
| Dividends* | Dividends on investments |
| Other Income* | Other investment income |
| Net Change Accrued Income* | Change in accrued earnings for interest and dividends |
| Unrealized Gain/Loss* | Unrealized Gain/Loss on investments |
| Realized Gain/Loss* | Realized Gain/Loss on investments |
| Defined Contribution Earnings (Net) | Not applicable for Defined Benefit plans |
| Investment Expenses | Allocated share of FPPA investment expense |
| Direct Expense Allocation | Expenses directly allocated to the plan Examples: actuarial and audit fees |
| Other Expenses | Allocated share of FPPA administrative expense |
| Allocated Income and Expense Sub-Total | Sub-Total of the above activity |
| Ending Balance | Plan assets at period end |

** Allocated from the Fire & Police Members' Benefit Investment Fund – Long Term Pool.*

MEMORANDUM

To: Affiliated Volunteer Fire Pension Plan Employers
Sent via email to the Volunteer Fire Plans GASB Contact

From: Fire & Police Pension Association

Re: Volunteer Fire Pension Plan Annual GASB 68 Report

Date: December 2021

Your volunteer fire pension plan is affiliated with the Fire & Police Pension Association ("FPPA") for the purpose of administering the plan and managing the funds of the plan for investment. This memo will outline the required annual reports provided by FPPA for your volunteer fire pension plan.

Your city/district is required to implement the Governmental Accounting Standards Board Statement No. 68, *Accounting and Financial Reporting for Pensions* ("GASB 68") into your annual financial statements. Information on GASB 68 can be found on FPPA's website at <https://www.fppaco.org/GASB/Overview2.html> or you may contact your auditor.

GASB 68 Report

The *GASB Statement No. 68 Employer Reporting Accounting Schedules for the Measurement Period Ending December 31, 2020 and Employer Reporting Period Ending December 31, 2021* for your volunteer fire pension plan is now available to download from the FPPA Employer Portal.

Login to the FPPA Employer Portal and the report will be located under the 'Documents' button and is labeled as *2021 Vol GASB 68 Report*. We have also included this memo for download and it is labeled as *2021 Vol GASB 68 Memo*. <https://ep.fppaco.org/ASPENPMVVM/ACCOUNT/wfmLoginE>

This report is used to satisfy the GASB 68 reporting requirements within your December 31, 2021 financial statements/audit.

SOC 1 Type 2 Report

The American Institute of Certified Public Accountants (AICPA) provided guidance to your auditors to ensure the GASB 68 report is accurate and certifiable. The AICPA recommended that FPPA issue a Statement on Standards for Attestation Engagements, Reporting on Controls at a Service Organization (SOC 1 Type 2) report on the allocation of inflows (i.e., contributions, investment income, etc.) and outflows (i.e., benefit payments, administrative expenses, etc.) and on the census data controlled by the plan.

A SOC report is a report on the controls at a service organization. Type 2 is a report on policies and procedures placed in operation, and test the operating effectiveness for a period of time. The purpose of the report is to give you and your auditor a greater level of assurance as to the accounting of your volunteer fire pension plan assets.

The *SOC 1 Type 2 Report for the Period January 1 through December 31, 2020* is available to download from the FPPA Employer Portal.

Login to the FPPA Employer Portal and the report will be located under the 'Documents' button and is labeled as *2021 Vol SOC Report (YE 12/31/20)*.
<https://ep.fppaco.org/ASPENEMVVM/ACCOUNT/wfmLoginE>

Fiduciary Net Position Schedule

FPPA included a Fiduciary Net Position by Participating Employer schedule as part of the 2020 Annual Report. You can locate this information under the Other Supplementary Schedules within the Financial Section starting on page 81 of the Annual Report. This was opined upon by FPPA's external auditors and both the schedule and opinion can be found in the Annual Report on FPPA's website at:
<https://www.fppaco.org/PDF/annual-reports/2020-Annual-Report-FPPA.pdf>

Implementation

To assist you in implementing GASB 68 into your financial statements, FPPA has developed the following materials. All documents are located within the "Employers Guide to GASB" section located on FPPA's website at:
<https://www.fppaco.org/GASB/LR2.html>

- 1) Implementation Guide;
- 2) Journal Entry Templates;
- 3) Video Presentations – about how to read the GASB 68 Report.

We recommend that you work with your auditor to discuss any GASB 68 detailed implementation questions since they issue an opinion on your financial statements. Your auditor will be able to assist you as you work through the calculations and journal entries associated with the implementation of GASB 68. If you have general questions regarding the reports located in the FPPA Employer Portal, please contact Jordy Bralower at jbralower@fppaco.org or 720-479-2343.

Peyton Fire Protection District Volunteer Pension Fund

GASB Statement No. 68 Employer Reporting and Accounting
Schedules for the
Measurement Period Ending December 31, 2020 and
Employer Reporting Period Ending December 31, 2021





September 2021

Administrative Heads and Finance Officers
For Funds Participation in FPPA
Peyton Fire Protection District Volunteer Pension Fund

Dear Administrative Heads and Finance Officers:

The accounting schedules submitted in this report are required under the Governmental Accounting Standards Board (GASB) Statement No. 68 "Employer Reporting for Pension Plans."

Our actuarial calculations for this report were prepared for the purpose of complying with the requirements of GASB Statement No. 68. These calculations have been made on a basis that is consistent with our understanding of this Statement.

Our calculation of the liability associated with the benefits described in this report was performed for the purpose of satisfying the requirements of GASB Statement No. 68. The Net Pension Liability is not an appropriate measure for measuring the sufficiency of plan assets to cover the estimated cost of settling the employer's benefit obligation. The Net Pension Liability is not an appropriate measure for assessing the need for or amount of future employer contributions. A calculation of the plan's liability for purposes other than satisfying the requirements of GASB Statement No. 68 may produce significantly different results. This report may be provided to parties other than the Peyton Fire Protection District Volunteer Pension Fund only in its entirety and only with the permission of Peyton Fire Protection District Volunteer Pension Fund.

This report is based upon information furnished to us by FPPA staff and verified by the department concerning retirement and ancillary benefits, active members, deferred vested members, retirees and beneficiaries, and financial data. This information was checked for internal consistency but was not audited.

This report complements the actuarial valuation report that was provided to Peyton Fire Protection District Volunteer Pension Fund and should be considered in conjunction with that report. Please see the actuarial valuation report as of January 1, 2021 for additional discussion of the nature of actuarial calculations and more information related to participant data, economic and demographic assumptions, and benefit provisions.

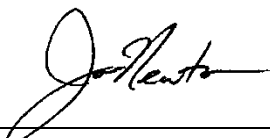
This report was prepared using our proprietary valuation model and related software which in our professional judgement has the capability to provide results that are consistent with the purposes of the valuation and has no material limitations or known weaknesses. We performed tests to ensure that the model reasonably represents that which is intended to be modeled.

To the best of our knowledge, the information contained with this report is accurate and fairly represents the actuarial position of the Peyton Fire Protection District Volunteer Pension Fund. All calculations have been made in conformity with generally accepted actuarial principles and practices as well as with the Actuarial Standards of Practice issued by the Actuarial Standards Board.

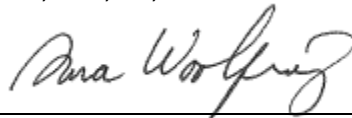
The signing actuaries are independent of the plan sponsor.

Joseph Newton and Dana Woolfrey are members of the American Academy of Actuaries (MAAA) and meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein. Both are experienced in performing valuations for public retirement systems.

Respectfully submitted,

By 

Joseph Newton
FSA, FCA, EA, MAAA

By 

Dana Woolfrey
FSA, FCA, EA, MAAA



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SECTION A

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY
FOR THE MEASUREMENT PERIOD ENDING DECEMBER 31, 2020
TO BE USED FOR DECEMBER 31, 2021 REPORTING PURPOSES

| | |
|---|-------------------|
| Actuarial Valuation Date | January 1, 2021 |
| Measurement Date of the Net Pension Liability/(Asset) | December 31, 2020 |
| Employer's Fiscal Year Ending Date (Reporting Date) | December 31, 2021 |

Membership as of January 1, 2021

| | |
|--------------------------------|-----------|
| Number of | |
| - Retirees and Beneficiaries | 1 |
| - Inactive, Nonretired Members | 1 |
| - Active Members | 20 |
| - Total | <u>22</u> |
| Covered Payroll | N/A |

Net Pension Liability/(Asset)

| | |
|---|---------------|
| Total Pension Liability | \$ 62,649 |
| Plan Fiduciary Net Position | <u>86,027</u> |
| Net Pension Liability/(Asset) | \$ (23,378) |
| Plan Fiduciary Net Position as a Percentage of Total Pension Liability | 137.32 % |
| Net Pension Liability/(Asset) as a Percentage of Covered Payroll | N/A |

Development of the Single Discount Rate

| | |
|---|--------|
| Single Discount Rate | 7.00 % |
| Long-Term Expected Rate of Investment Return | 7.00 % |
| Long-Term Municipal Bond Rate* | 2.00 % |
| Last year ending December 31 in the 2021 to 2120 projection period for which projected benefit payments are fully funded | 2120 |

Total Pension Expense/(Income) \$ 16,382

Deferred Outflows and Deferred Inflows of Resources by Source to be recognized in Future Pension Expense/(Income)

| | Deferred Outflows of Resources | Deferred Inflows of Resources |
|---|-----------------------------------|----------------------------------|
| Difference between expected and actual experience | \$ 10,329 | \$ 2,297 |
| Changes in assumptions | 1,005 | 0 |
| Net difference between projected and actual earnings on pension plan investments | <u>2,037</u> | <u>7,396</u> |
| Total | <u>\$ 13,371</u> | <u>\$ 9,693</u> |

*Source: Fixed-income municipal bonds with 20 years to maturity that include only federally tax-exempt municipal bonds as reported in Fidelity Index's "20-Year Municipal GO AA Index" as of December 31, 2020. In describing this index, Fidelity notes that the municipal curves are constructed using option-adjusted analytics of a diverse population of over 10,000 tax exempt securities.



Discussion

Accounting Standard

For state and local government employers (as well as certain non-employers) that contribute to a defined benefit pension plan administered through a trust or equivalent arrangement, Governmental Accounting Standards Board (GASB) Statement No. 68 establishes standards for pension accounting and financial reporting. Under GASB Statement No. 68, the employer must account for and disclose the net pension liability/(asset), pension expense/(income), and other information associated with providing retirement benefits to their employees (and former employees) on their basic financial statements. The volunteer fire plans are considered agent multiple-employer plans and employer reporting should apply the sections of the Statement No. 68 pertaining to agent employers.

The following discussion provides a summary of the information that is required to be disclosed under these accounting standards. A number of these disclosure items are provided in this report. However, certain information is not included in this report if it is not actuarial in nature, such as the notes to the financial statements regarding accounting policies and investments. As a result, the retirement system and/or plan sponsor is responsible for preparing and disclosing the non-actuarial information needed to comply with these accounting standards.

Financial Statements

GASB Statement No. 68 requires state and local government employers that contribute to defined benefit pension plans to recognize the net pension liability/(asset) and the pension expense/(income) on their financial statements, along with the related deferred outflows of resources and deferred inflows of resources. The net pension liability/(asset) is the difference between the total pension liability and the plan's fiduciary net position. In traditional actuarial terms, this is analogous to the accrued liability less the market value of assets (not the smoothed actuarial value of assets that is often encountered in actuarial valuations performed to determine the employer's contribution requirement).

Paragraph 34 of GASB Statement No. 68 states, "Contributions to the pension plan from the employer subsequent to the measurement date of the collective net pension liability/(asset) and before the end of the employer's reporting period should be reported as a deferred outflow of resources related to pensions." The information contained in this report does not incorporate any contributions made to Peyton Fire Protection District Volunteer Pension Fund subsequent to the measurement date of December 31, 2020.

The pension expense/(income) recognized each fiscal year is equal to the change in the net pension liability/(asset) from the beginning of the year to the end of the year, adjusted for deferred recognition of the certain changes in the liability and investment experience.

Notes to Financial Statements

GASB Statement No. 68 requires the notes of the employer's financial statements to disclose the total pension expense/(income), the pension plan's liabilities and assets, and deferred outflows of resources and inflows of resources related to pensions.

In addition, GASB Statement No. 68 requires the notes of the financial statements for the employers to include certain additional information, including:

- a description of the types of benefits provided by the plan, as well as any benefit improvements;
- the number and classes of employees covered by the benefit terms;
- for the current year, sources of changes in the net pension liability/(asset);
- significant assumptions and methods used to calculate the total pension liability;
- inputs to the Single Discount Rate;
- certain information about mortality assumptions and the dates of experience studies;
- the date of the valuation used to determine the total pension liability;
- information about changes of assumptions or other inputs and benefit terms;
- the basis for determining contributions to the plan, including a description of the plan's funding policy, as well as employer contribution requirements;
- the total pension liability, fiduciary net position, net pension liability/(asset), and the pension plan's fiduciary net position as a percentage of the total pension liability;
- the net pension liability/(asset) using a discount rate that is 1% higher and 1% lower than used to calculate the total pension liability and net pension liability/(asset) for financial reporting purposes; and
- a description of the system that administers the pension plan.

Required Supplementary Information

The financial statements of employers also include required supplementary information showing the 10-year fiscal history of:

- sources of changes in the net pension liability/(asset);
- information about the components of the net pension liability/(asset) and related ratios, including the pension plan's fiduciary net position as a percentage of the total pension liability, and the net pension liability as a percent of covered-employee payroll*; and
- a comparison of actual employer contributions to the actuarially determined contributions based on the plan's funding policy.

While the first two tables may be built prospectively as the information becomes available, sufficient information is currently available for the third table.

The employer is responsible for maintaining the detailed records necessary to building the 10-year schedules.

General Implications of Contribution Allocation Procedure or Funding Policy on Future Expected Plan Contributions and Funded Status

This funding policy results in the expectation that the plan's assets will be able to fully pay for promised benefits through at least 2120. The projections in this report are strictly for the purpose of determining the GASB single discount rate and are different from a funding projection for the ongoing plan.

Timing of the Valuation

An actuarial valuation to determine the total pension liability is required to be performed at least every two years. For the employer's financial reporting purposes, the net pension liability/(asset) and pension expense/(income) should be measured as of the employer's "measurement date" which may not be earlier than the employer's prior fiscal year-end date. If the actuarial valuation used to determine the total pension liability is not calculated as of the measurement date, the total pension liability is required to be rolled forward from the actuarial valuation date to the measurement date.

The total pension liability shown in this report is based on an actuarial valuation performed as of January 1, 2021 and a measurement date of December 31, 2020. This measurement date is within one year of the plan sponsor's fiscal year end of December 31, 2021 and may be used for December 31, 2021 reporting purposes.

Expense and deferred outflow calculations are shown starting with the year ending December 31, 2020, but can be used for the plan sponsor's December 31, 2021 financial reporting. Each reported amount will have a one-year lag so that year end December 31, 2020 can be used for December 31, 2021 plan sponsor reporting.

**Covered-employee payroll is not applicable for volunteer pension plans.*



Paragraph 34 of GASB Statement No. 68 indicates that contributions to the pension plan subsequent to the measurement date of the Net Pension Liability/(Asset) and prior to the end of the employer's reporting period should be reported by the employer as a deferred outflow of resources related to pensions. The information contained in this report does not incorporate any contributions made to the Peyton Fire Protection District Volunteer Pension Fund subsequent to December 31, 2020; the employer will need to add 2021 contributions into the Deferred Outflows.

Single Discount Rate

Projected benefit payments are required to be discounted to their actuarial present values using a Single Discount Rate that reflects (1) a long-term expected rate of return on pension plan investments (to the extent that the plan's fiduciary net position is projected to be sufficient to pay benefits) and (2) tax-exempt municipal bond rate based on an index of 20-year general obligation bonds with an average AA credit rating as of the measurement date (to the extent that the plan's projected fiduciary net position is not sufficient to pay benefits).

For the purpose of this valuation, the long-term expected rate of return on pension plan investments is 7.00%; the municipal bond rate is 2.00% (based on the weekly rate closest to but not later than the measurement date of the "state & local bonds" rate from Federal Reserve statistical release (H.15)); and the resulting Single Discount Rate is 7.00%.

Projected cash flows used in determining the Single Discount Rate are available upon request.

Incorporation of Plan Changes

The Total Pension Liability as of December 31, 2020 includes any plan changes through that date. If there were any plan changes effective during the year ending December 31, 2020, the increase in the Total Pension Liability will be reflected in the "Benefit Changes" item on page 11 as well as the Pension Expense on Page 7. The plan provisions used in determining the Total Pension Liability as of December 31, 2020 are shown on page 17 of the report.

SECTION B

FINANCIAL STATEMENTS

Pension Expense/(Income) Under GASB Statement No. 68
Measurement Period Ending December 31, 2020
for the Employer Fiscal Year Ending December 31, 2021

A. Pension Expense/(Income)

| | | |
|--|-----------|---------------|
| 1. Service Cost | \$ | 933 |
| 2. Interest on the Total Pension Liability | | 2,292 |
| 3. Current-Period Benefit Changes | | 15,501 |
| 4. Projected Earnings on Plan Investments (made negative here to offset expense) | | (5,160) |
| 5. Pension Plan Administrative Expense | | 2,906 |
| 6. State of Colorado Supplemental Discretionary Payment | | 0 |
| 7. Recognition of Outflow (Inflow) of Resources due to Liabilities | | 1,379 |
| 8. Recognition of Outflow (Inflow) of Resources due to Assets | | (1,469) |
| 9. Total Pension Expense/(Income) | \$ | 16,382 |

Statement of Outflows and Inflows arising from the Current Measurement Period Ending December 31, 2020 for the Employer Fiscal Year Ending December 31, 2021

A. Outflows (Inflows) of Resources due to Liabilities

| | | |
|--|----|--------|
| 1. Difference between expected and actual experience of the Total Pension Liability (gains) or losses | \$ | 12,242 |
| 2. Assumption Changes (gains) or losses | \$ | 0 |
| 3. Recognition period for Liabilities: Average of the expected remaining service lives of all participants {in years}* | | 6.4000 |
| 4. Outflow (Inflow) of Resources to be recognized in the current pension expense/(income) for the difference between expected and actual experience of the Total Pension Liability | \$ | 1,913 |
| 5. Outflow (Inflow) of Resources to be recognized in the current pension expense/(income) for assumption changes | \$ | 0 |
| 6. Outflow (Inflow) of Resources to be recognized in the current pension expense/(income) due to Liabilities (Item A.4 + Item A.5) | \$ | 1,913 |
| 7. Deferred Outflow (Inflow) of Resources to be recognized in future pension expense/(income) for the difference between expected and actual experience of the Total Pension Liability (Item A.1 - Item A.4) | \$ | 10,329 |
| 8. Deferred Outflow (Inflow) of Resources to be recognized in future pension expense/(income) for assumption changes (Item A.2 - Item A.5) | \$ | 0 |
| 9. Deferred Outflow (Inflow) of Resources to be recognized in future pension expense/(income) due to Liabilities (Item A.7 + Item A.8) | \$ | 10,329 |

B. Outflows (Inflows) of Resources due to Assets

| | | |
|---|----|---------|
| 1. Net difference between projected and actual earnings on pension plan investments (gains) or losses | \$ | (4,557) |
| 2. Recognition period for Assets {in years, closed 5-year period} | | 5.0000 |
| 3. Outflow (Inflow) of Resources to be recognized in the current pension expense/(income) due to Assets (Item B.1 / Item B.2) | \$ | (911) |
| 4. Deferred Outflow (Inflow) of Resources to be recognized in future pension expenses due to Assets (Item B.1 - Item B.3) | \$ | (3,646) |

**The expected remaining service life of a participant represents how long they are expected to be an active employee under the plan. The average shown is an average of all participants, including inactive participants (retirees, beneficiaries, etc.), who have a remaining service life of 0.0.*



Statement of Outflows and Inflows arising from the Current and Prior Measurement Periods Through December 31, 2020 for the Employer Fiscal Year Ending December 31, 2021

A. Current Pension Expense/(Income) - Outflows and Inflows of Resources due to Liabilities and Assets to be Recognized in Current Pension Expense/(Income)

| | Outflows of Resources | Inflows of Resources | Net Outflows/(Inflows) of Resources |
|-----------------------|--------------------------|-------------------------|--|
| 1. Due to Liabilities | \$ 2,196 | \$ 817 | \$ 1,379 |
| 2. Due to Assets | 1,248 | 2,717 | (1,469) |
| 3. Total | \$ 3,444 | \$ 3,534 | \$ (90) |

B. Current Pension Expense/(Income) - Outflows and Inflows of Resources by Source to be Recognized in Current Pension Expense/(Income)

| | Outflows of Resources | Inflows of Resources | Net Outflows/(Inflows) of Resources |
|---|--------------------------|-------------------------|--|
| 1. Differences between expected and actual experience | \$ 1,913 | \$ 817 | \$ 1,096 |
| 2. Assumption Changes | 283 | 0 | 283 |
| 3. Net Difference between projected and actual earnings on pension plan investments | 1,248 | 2,717 | (1,469) |
| 4. Total | \$ 3,444 | \$ 3,534 | \$ (90) |

C. Future Pension Expense/(Income) - Deferred Outflows and Deferred Inflows of Resources by Source to be Recognized in Future Pension Expense/(Income)

| | Deferred Outflows of Resources | Deferred Inflows of Resources | Net Deferred Outflows/ (Inflows) of Resources |
|---|-----------------------------------|----------------------------------|--|
| 1. Differences between expected and actual experience | \$ 10,329 | \$ 2,297 | \$ 8,032 |
| 2. Assumption Changes | 1,005 | 0 | 1,005 |
| 3. Net Difference between projected and actual earnings on pension plan investments | 2,037 | 7,396 | (5,359) |
| 4. Total | \$ 13,371 | \$ 9,693 | \$ 3,678 |

D. Future Pension Expense/(Income) - Deferred Outflows and Deferred Inflows of Resources by Year to be Recognized in Future Pension Expense/(Income)

| Fiscal Year Ending December 31 | Net Deferred Outflows/ (Inflows) of Resources |
|-----------------------------------|--|
| 2022 | \$ (320) |
| 2023 | 691 |
| 2024 | (246) |
| 2025 | 911 |
| 2026 | 1,878 |
| Thereafter | 764 |
| Total | \$ 3,678 |



History of Deferred Outflows and Inflows of Resources by Source for Measurement Periods Through December 31, 2020 for the Employer Fiscal Year Ending December 31, 2021

Differences between expected and actual experience - Net outflows of resources

| Recognition Period | 8.0000 2015 | 7.7143 2016 | 7.7143 2017 | 7.4615 2018 | 7.4615 2019 | 6.4000 2020 | 6.4000 2021 | Total | Deferred Net Outflows at Reporting Date |
|--------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------|---|
| Total | \$ (1,435) | \$ 0 | \$ (3,208) | \$ 0 | \$ (1,653) | \$ 0 | \$ 12,242 | | |
| 2015 | (179) | | | | | | | (179) | |
| 2016 | (179) | 0 | | | | | | (179) | |
| 2017 | (179) | 0 | (416) | | | | | (595) | |
| 2018 | (179) | 0 | (416) | 0 | | | | (595) | |
| 2019 | (179) | 0 | (416) | 0 | (222) | | | (817) | |
| 2020 | (179) | 0 | (416) | 0 | (222) | 0 | | (817) | |
| 2021 | (179) | 0 | (416) | 0 | (222) | 0 | 1,913 | 1,096 | |
| 2022 | (182) | 0 | (416) | 0 | (222) | 0 | 1,913 | 1,093 | \$ 8,032 |
| 2023 | 0 | 0 | (416) | 0 | (222) | 0 | 1,913 | 1,275 | |
| 2024 | 0 | 0 | (296) | 0 | (222) | 0 | 1,913 | 1,395 | |
| Thereafter | 0 | 0 | 0 | 0 | (321) | 0 | 4,590 | 4,269 | |
| | \$ (1,435) | \$ 0 | \$ (3,208) | \$ 0 | \$ (1,653) | \$ 0 | \$ 12,242 | \$ 5,946 | |

Assumption changes - Net outflows of resources

| Recognition Period | 8.0000 2015 | 7.7143 2016 | 7.7143 2017 | 7.4615 2018 | 7.4615 2019 | 6.4000 2020 | 6.4000 2021 | Total | |
|--------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------|----------|
| Total | \$ 0 | \$ 0 | \$ 1,159 | \$ 0 | \$ 995 | \$ 0 | \$ 0 | | |
| 2015 | 0 | | | | | | | 0 | |
| 2016 | 0 | 0 | | | | | | 0 | |
| 2017 | 0 | 0 | 150 | | | | | 150 | |
| 2018 | 0 | 0 | 150 | 0 | | | | 150 | |
| 2019 | 0 | 0 | 150 | 0 | 133 | | | 283 | |
| 2020 | 0 | 0 | 150 | 0 | 133 | 0 | | 283 | |
| 2021 | 0 | 0 | 150 | 0 | 133 | 0 | 0 | 283 | |
| 2022 | 0 | 0 | 150 | 0 | 133 | 0 | 0 | 283 | \$ 1,005 |
| 2023 | 0 | 0 | 150 | 0 | 133 | 0 | 0 | 283 | |
| 2024 | 0 | 0 | 109 | 0 | 133 | 0 | 0 | 242 | |
| Thereafter | 0 | 0 | 0 | 0 | 197 | 0 | 0 | 197 | |
| | \$ 0 | \$ 0 | \$ 1,159 | \$ 0 | \$ 995 | \$ 0 | \$ 0 | \$ 2,154 | |

Net Difference between projected and actual earnings on pension plan investments - Net outflows of resources

| Recognition Period | 5.0000 2015 | 5.0000 2016 | 5.0000 2017 | 5.0000 2018 | 5.0000 2019 | 5.0000 2020 | 5.0000 2021 | Total | |
|--------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------|------------|
| Total | \$ 364 | \$ 2,756 | \$ 1,149 | \$ (4,158) | \$ 5,094 | \$ (4,868) | \$ (4,557) | | |
| 2015 | 73 | | | | | | | 73 | |
| 2016 | 73 | 551 | | | | | | 624 | |
| 2017 | 73 | 551 | 230 | | | | | 854 | |
| 2018 | 73 | 551 | 230 | (832) | | | | 22 | |
| 2019 | 72 | 551 | 230 | (832) | 1,019 | | | 1,040 | |
| 2020 | 0 | 552 | 230 | (832) | 1,019 | (974) | | (5) | |
| 2021 | 0 | 0 | 229 | (832) | 1,019 | (974) | (911) | (1,469) | |
| 2022 | 0 | 0 | 0 | (830) | 1,019 | (974) | (911) | (1,696) | \$ (5,359) |
| 2023 | 0 | 0 | 0 | 0 | 1,018 | (974) | (911) | (867) | |
| 2024 | 0 | 0 | 0 | 0 | 0 | (972) | (911) | (1,883) | |
| Thereafter | 0 | 0 | 0 | 0 | 0 | 0 | (913) | (913) | |
| | \$ 364 | \$ 2,756 | \$ 1,149 | \$ (4,158) | \$ 5,094 | \$ (4,868) | \$ (4,557) | \$ (4,220) | |

Total - Net outflows of resources

| | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | Total | |
|--------------|------------|----------|----------|------------|----------|------------|----------|----------|----------|
| Total | \$ (1,071) | \$ 2,756 | \$ (900) | \$ (4,158) | \$ 4,436 | \$ (4,868) | \$ 7,685 | | |
| 2015 | (106) | | | | | | | (106) | |
| 2016 | (106) | 551 | | | | | | 445 | |
| 2017 | (106) | 551 | (36) | | | | | 409 | |
| 2018 | (106) | 551 | (36) | (832) | | | | (423) | |
| 2019 | (107) | 551 | (36) | (832) | 930 | | | 506 | |
| 2020 | (179) | 552 | (36) | (832) | 930 | (974) | 0 | (539) | |
| 2021 | (179) | 0 | (37) | (832) | 930 | (974) | 1,002 | (90) | |
| 2022 | (182) | 0 | (266) | (830) | 930 | (974) | 1,002 | (320) | \$ 3,678 |
| 2023 | 0 | 0 | (266) | 0 | 929 | (974) | 1,002 | 691 | |
| 2024 | 0 | 0 | (187) | 0 | (89) | (972) | 1,002 | (246) | |
| Thereafter | 0 | 0 | 0 | 0 | (124) | 0 | 3,677 | 3,553 | |
| | \$ (1,071) | \$ 2,756 | \$ (900) | \$ (4,158) | \$ 4,436 | \$ (4,868) | \$ 7,685 | \$ 3,880 | |



Schedule of Changes in Net Pension Liability/(Asset) and Related Ratios Current Period Measurement Period Ended December 31, 2020

| | | |
|--|-----------|-----------------|
| A. Total pension liability | | |
| 1. Service Cost | \$ | 933 |
| 2. Interest on the Total Pension Liability | | 2,292 |
| 3. Benefit changes | | 15,501 |
| 4. Difference between expected and actual experience of the Total Pension Liability | | 12,242 |
| 5. Changes of assumptions | | 0 |
| 6. Benefit payments | | (1,200) |
| 7. Net change in total pension liability | \$ | 29,768 |
| 8. Total pension liability – beginning | | 32,881 |
| 9. Total pension liability – ending | <u>\$</u> | <u>62,649</u> |
| B. Plan fiduciary net position | | |
| 1. Contributions – employer | \$ | 9,200 |
| 2. Net investment income | | 9,717 |
| 3. Benefit payments | | (1,200) |
| 4. Pension Plan Administrative Expense | | (2,906) |
| 5. State of Colorado supplemental discretionary payment | | 0 |
| 6. Net change in plan fiduciary net position | \$ | 14,811 |
| 7. Plan fiduciary net position – beginning (Market value of assets at beginning of year) | | 71,216 |
| 8. Plan fiduciary net position – ending (Market value of assets at end of year) | <u>\$</u> | <u>86,027</u> |
| C. Net pension liability/(asset) (Item A.9 - Item B.8) | <u>\$</u> | <u>(23,378)</u> |
| D. Plan fiduciary net position as a percentage of the total pension liability (Item B.8 / Item A.9) | | 137.32% |
| E. Covered-employee payroll | | N/A |
| F. Net pension liability/(asset) as a percentage of covered employee payroll | | N/A |

Schedule of Contributions For Purposes of Building a 10-Year History

| Year Ending December 31, | Actuarially Determined Contribution | Actual Contribution* | Contribution Deficiency (Excess) | Covered Payroll | Actual Contribution as a % of Covered Payroll |
|-----------------------------|---|-------------------------|--|--------------------|---|
| (a) | (b) | (c) | (d) = (b) - (c) | (e) | (f) |
| 2020 | \$ 2,357 | \$ 9,200 | \$ (6,843) | N/A | N/A |

**Includes both employer and State of Colorado Supplemental Discretionary Payment.*

Information for the measurement periods ending December 31, 2014 through December 31, 2019 should be obtained from the prior years' reports for purposes of building the 10-year history.

Notes to Schedule of Contributions

Valuation Date:

Notes Actuarially determined contribution rates are calculated as of January 1 of odd numbered years. The contribution rates have a one-year lag, so the actuarial valuation as of January 1, 2019 determines the contribution amounts for 2020 and 2021.

Methods and Assumptions Used to Determine Contribution Rates for the Fiscal Year Ending December 31, 2020:

| | |
|-------------------------------|--|
| Actuarial Cost Method | Entry Age Normal |
| Amortization Method | Level Dollar, Open* |
| Remaining Amortization Period | 20 years* |
| Asset Valuation Method | 5-Year smoothed fair value |
| Inflation | 2.50% |
| Salary Increases | N/A |
| Investment Rate of Return | 7.00% |
| Retirement Age | 50% per year of eligibility until 100% at age 65. |
| Mortality | Pre-retirement: 2006 central rates from the RP-2014 Employee Mortality Tables for males and females projected to 2018 using the MP-2017 projection scales, and then projected prospectively using the ultimate rates of the scale for all years, 50% multiplier for off-duty mortality. Post-retirement: 2006 central rates from the RP-2014 Annuitant Mortality Tables for males and females projected to 2018 using the MP-2017 projection scales, and then projected prospectively using the ultimate rates of the scale for all years. Disabled: 2006 central rates from the RP-2014 Disabled Mortality Tables for males and females projected to 2018 using the MP-2017 projection scales, and then projected prospectively using the ultimate rates of the scale for all years. |

*Plans that are heavily weighted with retiree liabilities use an amortization period based on the expected remaining lifetime of the participants.

FPPA System Description

The Fire & Police Pension Association (FPPA) administers an agent multiple-employer Public Employee Retirement System (PERS). The PERS represents the assets of numerous separate plans that have been pooled for investment purposes. The pension plans have elected to affiliate with FPPA for plan administration and investment only. FPPA issues a publicly available comprehensive annual financial report that can be obtained at FPPAco.org. Once in the site, locate the site map at the bottom of the web page and you will find the 'Annual Report' link.



Long-Term Expected Return on Plan Assets

The long-term expected rate of return on pension plan investments was determined using a building-block method in which best-estimate ranges of expected future real rates of return (expected returns, net of pension plan investment expense and inflation) are developed for each major asset class. These ranges are combined to produce the long-term expected rate of return by weighing the expected future real rates of return by the target asset allocation percentage and by adding expected inflation. Best estimates of arithmetic nominal rates of return for each major asset class included in the Fund's target asset allocation as of December 31, 2020 are summarized in the following table:

| <u>Asset Class</u> | <u>Target Allocation</u> | <u>Long-Term Expected Nominal Rate of Return</u> |
|-----------------------|--------------------------|--|
| Cash | 2.00 % | 2.32 % |
| Fixed Income - Rates | 10.00 % | 4.01 % |
| Fixed Income - Credit | 5.00 % | 5.25 % |
| Absolute Return | 10.00 % | 5.60 % |
| Long Short | 8.00 % | 6.87 % |
| Global Equity | 39.00 % | 8.23 % |
| Private Markets | 26.00 % | 10.63 % |
| Total | 100.00 % | |

The figures in the above table were supplied by Fire and Police Pension Association Staff. Gabriel, Roeder, Smith & Company does not provide investment advice.

Regarding the sensitivity of the net pension liability/(asset) to changes in the Single Discount Rate, the following presents the plan’s net pension liability/(asset), calculated using a Single Discount Rate of 7.00%, as well as what the plan’s net pension liability/(asset) would be if it were calculated using a Single Discount Rate that is one percent lower or one percent higher:

**Sensitivity of Net Pension Liability/(Asset)
to the Single Discount Rate Assumption
for the Measurement Period ending December 31, 2020**

| 1% Decrease 6.00% | Current Single Discount Rate Assumption 7.00% | 1% Increase 8.00% |
|----------------------|---|----------------------|
| \$ (13,461) | \$ (23,378) | \$ (31,322) |

SECTION C

BENEFIT PROVISIONS

Benefit Provisions Used to Determine the Total Pension Liability for the Measurement Period ending December 31, 2020

| | |
|---|----------|
| 1. Normal Retirement Benefit at Age 50 with 20 years of Service (monthly): | |
| a. Regular | \$150.00 |
| b. Extended Service Amount Per Year of Service | \$0.00 |
| 2. Vested Retirement Benefit (monthly): | |
| a. With 10 to 20 Years of Service Amount Per Year of Service per Minimum Vesting Years | \$7.50 |
| b. Minimum Vesting Years | 20 |
| 3. Disability Retirement Benefit (monthly): | |
| a. Short Term Disability for line of duty injury Amount payable for not more than 1 year | \$75.00 |
| b. Long Term Disability for line of duty injury Lifetime Benefit | \$150.00 |
| 4. Survivor Benefits (monthly): | |
| a. Following Death before Retirement Eligible; Due to death in line of duty as a volunteer firefighter | \$0.00 |
| b. Following Death after Normal Retirement | \$0.00 |
| c. Following Death after Normal Retirement with Extended Service Amount Per Year of Service | \$0.00 |
| d. Following Death after Vested Retirement with 10 to 20 Years of Service Amount Per Year of Service per Minimum Vesting Years | \$0.00 |
| e. Following Death after Disability Retirement | \$0.00 |
| f. Optional Survivor Benefit Following Death before or after Retirement Eligible; Due to death on or off duty as a volunteer firefighter (Purchase of Life Insurance Required) | \$0.00 |
| 5. Funeral Benefits (Required Benefit): | |
| a. Funeral Benefit Lump Sum, one time only | \$150.00 |

Includes any benefit improvements through the end of the measurement period at December 31, 2020, if applicable.

SECTION D

GLOSSARY OF TERMS

Glossary of Terms

| | |
|---|---|
| <i>Actuarial Accrued Liability (AAL)</i> | The AAL is the difference between the actuarial present value of all benefits and the actuarial value of future normal costs. The definition comes from the fundamental equation of funding which states that the present value of all benefits is the sum of the Actuarial Accrued Liability and the present value of future normal costs. The AAL may also be referred to as "accrued liability" or "actuarial liability." |
| <i>Actuarial Assumptions</i> | These assumptions are estimates of future experience with respect to rates of mortality, disability, turnover, retirement, rate or rates of investment income and compensation increases. Actuarial assumptions are generally based on past experience, often modified for projected changes in conditions. Economic assumptions (compensation increases, payroll growth, inflation and investment return) consist of an underlying real rate of return plus an assumption for a long-term average rate of inflation. |
| <i>Accrued Service</i> | Service credited under the system which was rendered before the date of the actuarial valuation. |
| <i>Actuarial Equivalent</i> | A single amount or series of amounts of equal actuarial value to another single amount or series of amounts, computed on the basis of appropriate actuarial assumptions. |
| <i>Actuarial Cost Method</i> | A mathematical budgeting procedure for allocating the dollar amount of the actuarial present value of the pension trust benefits between future normal cost and actuarial accrued liability. The actuarial cost method may also be referred to as the actuarial funding method. |
| <i>Actuarial Gain (Loss)</i> | The difference in liabilities between actual experience and expected experience during the period between two actuarial valuations is the gain (loss) on the accrued liabilities. |
| <i>Actuarial Present Value (APV)</i> | The amount of funds currently required to provide a payment or series of payments in the future. The present value is determined by discounting future payments at predetermined rates of interest and probabilities of payment. |
| <i>Actuarial Valuation</i> | The actuarial valuation report determines, as of the actuarial valuation date, the service cost, total pension liability, and related actuarial present value of projected benefit payments for pensions. |
| <i>Actuarial Valuation Date</i> | The date as of which an actuarial valuation is performed. |
| <i>Actuarially Determined Contribution (ADC) or Annual Required Contribution (ARC)</i> | A calculated contribution into a defined benefit pension plan for the reporting period, most often determined based on the funding policy of the plan. Typically the Actuarially Determined Contribution has a normal cost payment and an amortization payment. |

Glossary of Terms

Agent Multiple-Employer Defined Benefit Pension Plan

A multiple-employer defined benefit pension plan in which the pension assets of more than one employer are pooled for investment purposes, but separate accounts are maintained for each individual employer so that each employer's share of the pooled assets is legally available to pay the benefits of only its employees.

Amortization Payment

The amortization payment is the periodic payment required to pay off an interest-discounted amount with payments of interest and principal.

Amortization Method

The method used to determine the periodic amortization payment may be a level dollar amount, or a level percent of pay amount. The period will typically be expressed in years, and the method will either be "open" (meaning, reset each year) or "closed" (the number of years remaining will decline each year).

Deferred Inflows and Outflows

The deferred inflows and outflows of pension resources are amounts used under GASB Statement No. 68 in developing the annual pension expense. Deferred inflows and outflows arise with differences between expected and actual experiences and changes of assumptions. The portion of these amounts not included in current pension expense/(income) should be included in the deferred inflows or outflows of resources.

Discount Rate

For GASB purposes, the discount rate is the single rate of return that results in the present value of all projected benefit payments to be equal to the sum of the funded and unfunded projected benefit payments, specifically:

1. The benefit payments to be made while the pension plans' fiduciary net position is projected to be greater than the benefit payments that are projected to be made in the period; and
2. The present value of the benefit payments not in (1) above, discounted using the municipal bond rate.

Entry Age Actuarial Cost Method (EAN)

The EAN is a cost method for allocating the costs of the plan between the normal cost and the accrued liability. The actuarial present value of the projected benefits of each individual included in an actuarial valuation is allocated on a level basis (either level dollar or level percent of pay) over the earnings or service of the individual between entry age and assumed exit ages(s). The portion of the actuarial present value allocated to a valuation year is the normal cost. The portion of this actuarial present value not provided for at a valuation date by the actuarial present value of future normal costs is the actuarial accrued liability. The sum of the accrued liability plus the present value of all future normal costs is the present value of all benefits.

Fiduciary Net Position

The fiduciary net position is the market value of the assets of the trust dedicated to the defined benefit provisions.



Glossary of Terms

| | |
|---|--|
| <i>GASB</i> | The Governmental Accounting Standards Board is an organization that exists in order to promulgate accounting standards for governmental entities. |
| <i>Long-Term Expected Rate of Return</i> | The long-term rate of return is the expected return to be earned over the entire trust portfolio based on the asset allocation of the portfolio. |
| <i>Money-Weighted Rate of Return</i> | The money-weighted rate of return is a method of calculating the returns that adjusts for the changing amounts actually invested. For purposes of GASB Statement No. 67, money-weighted rate of return is calculated as the internal rate of return on pension plan investments, net of pension plan investment expense. |
| <i>Multiple-Employer Defined Benefit Pension Plan</i> | A multiple-employer plan is a defined benefit pension plan that is used to provide pensions to the employees of more than one employer. |
| <i>Municipal Bond Rate</i> | The Municipal Bond Rate is the discount rate to be used for those benefit payments that occur after the assets of the trust have been depleted. |
| <i>Net Pension Liability/(Asset) (NPL)/(NPA)</i> | The NPL is the liability of employers and non-employer contributing entities to plan members for benefits provided through a defined benefit pension plan. |
| <i>Non-Employer Contributing Entities</i> | Non-employer contributing entities are entities that make contributions to a pension plan that is used to provide pensions to the employees of other entities. For purposes of the GASB accounting statements, plan members are not considered non-employer contributing entities. The State of Colorado is a non-employer contributing entity, but they are not in a Special Funding Situation. |
| <i>Normal Cost</i> | The portion of the actuarial present value allocated to a valuation year is called the normal cost. For purposes of application to the requirements of this Statement, the term normal cost is the equivalent of service cost. |
| <i>Real Rate of Return</i> | The real rate of return is the rate of return on an investment after adjustment to eliminate inflation. |
| <i>Service Cost (often referred to as the Normal Cost)</i> | The service cost is the portion of the actuarial present value of projected benefit payments that is attributed to a valuation year. For plans with a Single Discount Rate of 7.00% at the beginning of the measurement period, the Service Cost will tie to the Normal Cost shown in the Development of the 2020 and 2021 Calculated Contribution (January 1, 2019 funding report). |

Glossary of Terms

Total Pension Expense/(Income)

The total pension expense/(income) is the sum of the following items that are recognized at the end of the employer's fiscal year:

1. Service Cost
2. Interest on the Total Pension Liability
3. Current-Period Benefit Changes
4. Projected Earnings on Plan Investments (made negative for addition here)
5. Pension Plan Administrative Expense
6. Other Changes in Plan Fiduciary Net Position
7. Recognition of Outflow (Inflow) of Resources due to Liabilities
8. Recognition of Outflow (Inflow) of Resources due to Assets

Total Pension Liability (TPL)

The TPL is the portion of the actuarial present value of projected benefit payments that is attributed to past periods of member service.

Unfunded Actuarial Accrued Liability (UAAL)

The UAAL is the difference between actuarial accrued liability and valuation assets.

Valuation Assets

The valuation assets are the assets used in determining the unfunded liability of the plan. For purposes of GASB Statement No. 68, the valuation assets are equal to the market value of assets.

PEYTON FIRE PROTECTION DISTRICT
PENSION TRUST FUND
BALANCE SHEET
MAY 31, 2022

| | | | |
|-------------------------------|---------------------------------|--------------|-----------|
| <u>ASSETS</u> | | | |
| 4-118 | FPPA PENSION FUND | 96,492.72 | |
| | | | |
| | TOTAL ASSETS | | 96,492.72 |
| <u>LIABILITIES AND EQUITY</u> | | | |
| | | | |
| <u>FUND EQUITY</u> | | | |
| 4-450 | FUND BALANCE | 161,784.85 | |
| UNAPPROPRIATED FUND BALANCE: | | | |
| 4-497 | CURRENT EARNINGS | (60,318.84) | |
| | REVENUE OVER EXPENDITURES - YTD | (4,973.29) | |
| | | | |
| | BALANCE - CURRENT DATE | (65,292.13) | |
| | | | |
| | TOTAL FUND EQUITY | | 96,492.72 |
| | TOTAL LIABILITIES AND EQUITY | | 96,492.72 |

PEYTON FIRE PROTECTION DISTRICT
PENSION TRUST FUND
STATEMENT OF REVENUE AND EXPENDITURES COMPARED TO BUDGET
FOR THE 5 MONTHS ENDING MAY 31, 2022

| | PERIOD ACTUAL | YTD ACTUAL | BUDGET | VARIANCE | PCNT |
|---|---------------|-------------|--------|-----------|------|
| <u>REVENUE</u> | | | | | |
| 4-560 INVESTMENT INCOME | 139.48 | 139.48 | .00 | (139.48) | .0 |
| 4-561 UNREALIZED GAIN OR (LOSS) | (4,769.52) | (4,769.52) | .00 | 4,769.52 | .0 |
| 4-565 REALIZED GAIN OR (LOSS) | 610.16 | 610.16 | .00 | (610.16) | .0 |
| 4-570 ACCRUED INCOME | 24.77 | 24.77 | .00 | (24.77) | .0 |
| 4-575 OTHER INCOME (LOSS) | (29.29) | (29.29) | .00 | 29.29 | .0 |
| TOTAL REVENUE | (4,024.40) | (4,024.40) | .00 | 4,024.40 | .0 |
| <u>EXPENSES</u> | | | | | |
| 4-610 PENSION FUND EXPENSES | 948.89 | 948.89 | .00 | (948.89) | .0 |
| TOTAL EXPENSES | 948.89 | 948.89 | .00 | (948.89) | .0 |
| EXCESS REVENUE OVER (UNDER) EXPENDITURES | (4,973.29) | (4,973.29) | .00 | 4,973.29 | .0 |
| FUND BALANCE - ENDING | (4,973.29) | (4,973.29) | .00 | 4,973.29 | .0 |

**Fire and Police Pension Association
Peyton FPD Volunteers 7281-5
For the Three Months Ending March 31, 2022**

| | |
|--|--------------------------|
| Beginning Balance | \$101,466.01 |
| Plan Direct Inflows and Outflows | |
| Member Contributions | |
| Employer Contributions | |
| Contributions from the SWDD Plan | |
| Refunds | |
| Affiliations/(Disaffiliations) | |
| Plan Transfers | |
| Net Benefits | |
| Plan Directed Expenses | |
| State Funding | |
| Plan Direct Inflows and Outflows Sub-Total | <hr/> |
| Allocated Income and Expense | |
| Interest | \$66.01 |
| Dividends | \$73.47 |
| Other Income | (\$29.29) |
| Net Change Accrued Income | \$24.77 |
| Unrealized Gain/Loss | (\$4,769.52) |
| Realized Gain/Loss | \$610.16 |
| Defined Contribution Earnings (Net) | |
| Investment Expenses | (\$137.69) |
| Direct Expense Allocation | (\$197.59) |
| Other Expenses | (\$613.61) |
| Allocated Income and Expense Sub-Total | <hr/> (\$4,973.29) <hr/> |
| Ending Balance | <hr/> <hr/> \$96,492.72 |

Fire and Police Pension Association

Volunteer Fire Pension Plan Contributions
PEYTON FPD 7281-5

For the Reporting Period: 01/01/2022 through 03/31/2022

| Deposit Date | Employer Contributions | State Matching Funds | Total Remittance |
|---|------------------------|----------------------|------------------|
| No deposits received for the reporting period | | | |

| | | | |
|--|--|--|--------------|
| Total Remittance | | | \$0.00 |
| Calculated Contribution per the 01/01/2021 Actuarial Study | | | \$4,079.00 |
| Difference Over/(Under) | | | \$(4,079.00) |

Note: The Calculated Contribution amount is due to FPPA before 12/31/2022

**Fire and Police Pension Association
 Direct Expense Allocation Summary
 Peyton FPD Volunteers 7281-5
 For the Three Months Ending March 31, 2022**

| Type of Expense | 2022 Budget | Year-to-Date Expenses | Payment of 2022 Expenses |
|---|-----------------|--------------------------|-----------------------------|
| Actuarial Expenses | \$313.56 | \$52.26 | |
| Audit Expenses | \$149.55 | \$145.33 | |
| Other Asset Allocation Study Expenses | | | |
| Total Direct Allocated Expenses & Payments | \$463.11 | \$197.59 | |

Actuarial expenses may exceed the budget related to asset allocation studies and implementation.

Contact Peggy Job at 720-479-2345 to obtain a detailed expense listing.

MEMORANDUM

To: Affiliated FPPA Volunteer Pension Plan Employers
From: Peggy Job, Senior Accountant
Re: Three Months ending March 31, 2022
 Allocation Report, Annual Contributions Received & Direct Expense Allocation Summary
Date: April 21, 2022

Allocation Report

Investment Performance

Your plan assets are commingled for investment purposes in the Members' Benefit Investment Fund – Long Term Pool ("Pool"). Returns for the Pool are as follows (returns for periods longer than one year are annualized):

| As of 03/31/2022 | Quarter | Year to Date | 1 Year | 3 Years | 5 Years |
|---------------------------------------|---------|--------------|--------|---------|---------|
| Total Pool Net of Investment Expense* | (4.04)% | (4.04)% | 7.47% | 10.87% | 9.81% |

*FPPA Administrative Expenses are not included in the Total Pool Net of Investment Expense percentages.

The table below summarizes expenses as a percentage of net assets for the Pool:

| Year | FPPA Administrative Expense* | Investment Management Expense | Total Expense Ratio |
|---------|------------------------------|-------------------------------|---------------------|
| Q1-2022 | 0.03% | 0.14% | 0.17% |
| 2021 | 0.12% | 0.81% | 0.93% |
| 2020 | 0.13% | 0.79% | 0.92% |
| 2019 | 0.13% | 0.80% | 0.93% |
| 2018 | 0.16% | 0.88% | 1.04% |
| 2017 | 0.23% | 0.89% | 1.12% |
| 2016 | 0.24% | 0.79% | 1.03% |

How to Calculate Your Plan Specific Expense Ratio

Your Allocation Report may reflect expenses specific to your plan such as actuarial expense and legal fees as well as expenses you directed FPPA to pay from your plan assets. These expenses are reflected in the line items *Plan Directed Expenses* and *Direct Expense Allocation*. As such, your plan's administrative expenses may differ from the Pool. In order to calculate your plan's administrative expense ratio, you will need to add the line items *Plan Directed Expenses*, *Direct Expense Allocation* and *Allocated Fees & Expenses* and divide by the *Ending Balance*.

Allocation Methodology

Investment Expenses and *Allocated Fees & Expenses* are separately allocated and separately reported in the Allocation Report. The *Investment Expenses* are allocated to each plan based on the plan's proportion of total assets. The *Allocated Fees & Expenses* are allocated based on the plan's proportion of total membership, including active, inactive and retired members as of December 31 of the prior year as defined by the guidelines within the Comprehensive Annual Financial Report. Member counts may be adjusted during the year for plan affiliation, disaffiliation, or reentry.

Review of the Report

Review the items *Member Contributions, Employer Contributions, Refunds, Affiliations, Net Benefits, Plan Directed Expenses and State Funding* and confirm that these amounts are correct year-to-date. **If any amount is not correct, please send a written response to FPPA by May 31, 2022. If FPPA does not receive a response by May 31, 2022, you are confirming that these report items are correct.**

Annual Contributions Received

FPPA provides a schedule of your 2022 contributions received by FPPA year to date. This schedule compares contributions received in the current year to the actuarial required contributions for 2022. **Please be aware that this report shows contributions based on the date received by FPPA and does not consider if contributions relate to a prior year.**

Direct Expense Allocation Summary

Direct Expense Allocation

FPPA provides a summary of expenses directly allocated to your plan, payments received related to these expenses and the related annual budgeted amounts. These costs are identified as direct plan expenses and are charged directly to the plan as a reduction of plan assets. They are reflected in the *Direct Expense Allocation* row of your Allocation Report. You may contact me to request a detailed summary of these allocated expenses.

The direct expense allocation is comprised of costs for audit and actuarial services. The audit services relate to the SOC 1 Type 2 report over the operating effectiveness of FPPA's controls for processing data and transactions related to your plan. The SOC 1 Type 2 report has been provided since 2014 to assist employers in reporting in accordance with Governmental Accounting Standards Board Statement No. 68 (GASB 68), *Accounting and Financial Reporting for Pensions*. Actuarial services include the biennial funding valuation report (issued in odd years for Volunteer Firefighter plans and even years for Old Hire plans) and the annual GASB 68 report. Actuarial services are provided by Gabriel Roeder Smith & Co. Audit services are provided by Eide Bailly LLP.

The Colorado Revised Statutes allow FPPA to allocate expenses that are directly related to the administration of the local affiliated plans from those plan's assets. For additional information, please see C.R.S. 31-31-701(7)(a)(VI) for old hire plans and C.R.S. 31-31-705(2)(f) for volunteer fire plans.

Payment of Settlor Expenses

Please discuss these direct plan expenses with your legal counsel to determine if they are a "settlor" expense. The Department of Labor believes that the employer should bear the cost of settlor expenses. If you agree, you should reimburse the plan for these expenses. This payment is in addition to any employer contributions made to the plan or as determined by the actuary (the actuarially determined contribution).

To reimburse the plan for these costs, please send payment via ACH or wire to FPPA. These payments need to be identified separately from your actuarial required contribution in order to net out the expense. Please contact FPPA for ACH or wire Instructions.

If you have any questions regarding your allocation report or the direct allocated plan expenses, please call me at 303-770-3772 in Metro Denver or 800-332-3772 or email me at pjob@fppaco.org.

Allocation Report Descriptions

This report provides the beginning of year plan balance, year-to-date totals, and an ending plan balance as of the report date

| | |
|---|--|
| <p>Beginning Balance</p> <p>Plan Direct Inflows and Outflows</p> <p>Member Contributions</p> <p>Employer Contributions</p> <p>Contributions from the SWDD Plan</p> <p>Refunds</p> <p>Affiliations/(Disaffiliations)</p> <p>Net Benefits</p> <p>Plan Directed Expenses</p> <p>State Funding</p> <p>Plan Direct Inflows and Outflows Sub-Total</p> <p>Allocated Income and Expense</p> <p>Interest*</p> <p>Dividends*</p> <p>Other Income*</p> <p>Net Change Accrued Income*</p> <p>Unrealized Gain/Loss*</p> <p>Realized Gain/Loss*</p> <p>Defined Contribution Earnings (Net)</p> <p>Investment Expenses</p> <p>Direct Expense Allocation</p> <p>Other Expenses</p> <p>Allocated Income and Expense Sub-Total</p> <p>Ending Balance</p> | <p>Plan assets at the beginning of the year</p> <p>Member Contributions made to the plan</p> <p>Employer Contributions made to the plan</p> <p>Contributions received for a member on disability rolling to a normal retirement</p> <p>Member withdrawal of funds from the plan</p> <p>Plan affiliation or disaffiliation or idle funds distribution (typically a Volunteer Fire Plan matter)</p> <p>Benefits paid to retired members</p> <p>Payments from plan assets directed by the department Examples: legal, actuarial, and insurance expense</p> <p>State funding for volunteer plans</p> <p>Sub-Total of the above activity</p> <p>Interest on investments</p> <p>Dividends on investments</p> <p>Other investment income</p> <p>Change in accrued earnings for interest and dividends</p> <p>Unrealized Gain/Loss on investments</p> <p>Realized Gain/Loss on investments</p> <p>Not applicable for Defined Benefit plans</p> <p>Allocated share of FPPA investment expense</p> <p>Expenses directly allocated to the plan Examples: actuarial and audit fees</p> <p>Allocated share of FPPA administrative expense</p> <p>Sub-Total of the above activity</p> <p>Plan assets at period end</p> |
|---|--|

** Allocated from the Fire & Police Members' Benefit Investment Fund – Long Term Pool.*



SOC 1, Type II Examination

Report of Fire and Police Pension Association of Colorado's Description of its Administration of Local Defined Benefit Pension Services for Police Officers and Firefighters Hired Prior to April 8, 1978, and for Affiliated Volunteer Firefighter Plans System and Related IT General Controls and on the Suitability of the Design and Operating Effectiveness of its Controls for the Period January 1, 2021 to December 31, 2021

Fire and Police Pension Association of Colorado

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January 1, 2021 to December 31, 2021

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Section I

Independent Service Auditor's Report



Independent Service Auditor's Report

The Board of Directors
Fire and Police Pension Association of Colorado
Greenwood Village, Colorado

Scope

We have examined Fire and Police Pension Association of Colorado's description of administration of local defined benefit pension plan services for police officers and firefighters hired prior to April 8, 1978 (Old Hire Plans) and for affiliated volunteer firefighter plans (Volunteer Plans) system and supporting General IT Controls (system) for processing user entities' transactions throughout the period January 1, 2021 to December 31, 2021 (description), and the suitability of the design and operating effectiveness of controls included in the description to achieve the related control objectives stated in the description, based on the criteria identified in Fire and Police Pension Association of Colorado Assertion (assertion). The controls and control objectives included in the description are those that management of Fire and Police Pension Association of Colorado believes are likely to be relevant to user entities' internal control over financial reporting, and the description does not include those aspects of the system that are not likely to be relevant to user entities' internal control over financial reporting.

Fire and Police Pension Association of Colorado uses various subservice organizations to provide treasury management, custodial, network security and monitoring, colocation services for internet connectivity, data backup and disaster recovery, portfolio administration, actuarial, and death monitoring services. The description of the system in section III of this report includes only the control objectives and related controls of Fire and Police Pension Association of Colorado and excludes the control objectives and related controls of the subservice organizations. The description also indicates that certain control objectives specified by Fire and Police Pension Association of Colorado can be achieved only if complementary subservice organization controls assumed in the design of Fire and Police Pension Association of Colorado's controls are suitably designed and operating effectively, along with related controls at Fire and Police Pension Association of Colorado. Our examination did not extend to controls at the subservice organizations and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of Fire and Police Pension Association of Colorado's controls are suitably designed and operating effectively, along with related controls at the service organization. Our examination did not extend to such complementary user controls and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

Service Organization's Responsibilities

In section II, Fire and Police Pension Association of Colorado has provided an assertion about the fairness of the presentation of the description and suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description. Fire and Police Pension Association of Colorado is responsible for preparing the description and assertion, including the completeness, accuracy, and method of presentation of the description and assertion, providing the services covered by the description, specifying the control objectives and stating them in the description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria stated in the assertion, and designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve the related control objectives stated in the description.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the description and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether, in all material respects, based on the criteria in management's assertion, the description is fairly presented and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the description throughout the period January 1, 2021 to December 31, 2021. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of controls involves:

- Performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design and operating effectiveness of the controls to achieve the related objectives stated in the description, based on the criteria in management's assertion;
- Assessing the risks that the description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the description;
- Testing the operating effectiveness of those controls that management considers necessary to provide reasonable assurance that the related control objectives stated in the description were achieved; and
- Evaluating the overall presentation of the description, suitability of the control objectives stated in the description, and suitability of the criteria specified by the service organization in its assertion.

Inherent Limitations

The description is prepared to meet the common needs of a broad range of user entities and their auditors who audit and report on user entities' financial statements and may not, therefore, include every aspect of the system that each individual user entity may consider important in its own particular environment. Because of their nature, controls at a service organization may not prevent, or detect and correct, all misstatements in processing or reporting transactions. Also, the projection to the future of any evaluation of the fairness of the presentation of the description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives is subject to the risk that controls at a service organization may become ineffective.

Description of Tests of Controls

The specific controls tested and the nature, timing, and results of those tests are presented in Section IV of this report.

Opinion

In our opinion, in all material respects, based on the criteria described in Fire and Police Pension Association of Colorado's assertion in Section II:

- a. The description fairly presents the system that was designed and implemented throughout the period January 1, 2021 to December 31, 2021.
- b. The controls related to the control objectives stated in the description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the period January 1, 2021 to December 31, 2021, and user entities and subservice organizations applied the complementary controls assumed in the design of Fire and Police Pension Association of Colorado's controls throughout the January 1, 2021 to December 31, 2021.
- c. The controls operated effectively to provide reasonable assurance that the control objectives stated in the description were achieved throughout the period January 1, 2021 to December 31, 2021, if complementary subservice organization and user entity controls assumed in the design of the Fire and Police Pension Association of Colorado's controls operated effectively throughout the period January 1, 2021 to December 31, 2021.

Restricted Use

This report, including the description of tests of controls and results thereof in Section IV, is intended solely for the information and use of management of Fire and Police Pension Association of Colorado, user entities of Fire and Police Pension Association of Colorado's system during some or all of the period January 1, 2021 to December 31, 2021, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have sufficient understanding to consider it, along with other information including information about controls implemented by user entities themselves, when assessing the risks of material misstatement of user entities' financial statements. This report is not intended to be and should not be used by anyone other than these specified parties.



Minneapolis, Minnesota
March 2, 2022



Section II

Management's Assertion provided by
Fire and Police Pension Association of Colorado

Fire and Police Pension Association of Colorado's Assertion

We have prepared the description of Fire and Police Pension Association of Colorado's pension system entitled administration of local defined benefit pension plan services for police officers and firefighters hired prior to April 8, 1978 (Old Hire Plans), and for affiliated volunteer firefighter plans (Volunteer Plans) system and supporting General IT Controls for processing user entities' transactions throughout the period January 1, 2021 to December 31, 2021 (description), for user entities of the system during some or all of the period January 1, 2021 to December 31, 2021, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have a sufficient understanding to consider it, along with other information, including information about controls implemented by subservice organizations and user entities of the systems themselves, when assessing the risks of material misstatements of user entities' financial statements.

Fire and Police Pension Association of Colorado uses several subservice organizations to provide services as listed on pages 22 to 25 of the description. The description includes only the control objectives and related controls of Fire and Police Pension Association of Colorado and excludes the control objectives and related controls of the subservice organizations. The description also indicates that certain control objectives specified in the description can be achieved only if complementary subservice organization controls assumed in the design of our controls are suitably designed and operating effectively, along with the related controls at Fire and Police Pension Association of Colorado. The description does not extend to controls of the subservice organizations.

The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of Fire and Police Pension Association of Colorado's controls are suitably designed and operating effectively, along with related controls at the service organization. The description does not extend to controls of the user entities.

We confirm, to the best of our knowledge and belief, that:

1. The description fairly presents the administration of local defined benefit pension plan services for police officers and firefighters hired prior to April 8, 1978 (Old Hire Plans) and for affiliated volunteer firefighter plans (Volunteer Plans) system made available to user entities of the system during some or all of the period January 1, 2021 to December 31, 2021, for processing their transactions as it relates to controls that are likely to be relevant to user entities' internal control over financial reporting. The criteria we used in making this assertion were that the description:
 - a. Presents how the system made available to user entities of the system was designed and implemented to process relevant user entity transactions, including, if applicable:
 - i. The types of services provided including, as appropriate, the classes of transactions processed.

- ii. The procedures, within both automated and manual systems, by which those services are provided, including as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports and other information prepared for user entities of the system.
 - iii. The information used in the performance of the procedures, including, if applicable, related accounting records, whether electronic or manual, and supporting information involved in initiating, authorizing, recording, processing, and reporting transactions; this includes the correction of incorrect information and how information is transferred to the reports and other information prepared for user entities.
 - iv. How the system captures and addresses significant events and conditions other than transactions.
 - v. The process used to prepare reports and other information for user entities.
 - vi. Services performed by a subservice organization, if any, including whether the carve-out method or the inclusive method has been used in relation to them.
 - vii. The specified control objectives and controls designed to achieve those objectives, including as applicable, complementary user entity controls and complementary subservice organization controls assumed in the design of the service organization's controls.
 - viii. Other aspects of our control environment, risk assessment process, information and communication systems (including the related business processes), control activities, and monitoring activities that are relevant to the services provided.
 - b. Includes relevant details of changes to the service organization's system during the period covered by the description.
 - c. Does not omit or distort information relevant to the service organization's system, while acknowledging that the description is prepared to meet the common needs of a broad range of user entities of the system and their user auditors, and may not, therefore, include every aspect of the administration of local defined benefit pension plan services for police officers and firefighters hired prior to April 8, 1978 (Old Hire Plans) and for affiliated volunteer firefighter plans (Volunteer Plans) system that each individual user entity of the system and its auditor may consider important in its own particular environment.
2. The controls related to the control objectives stated in the description were suitably designed and operated effectively throughout the period January 1, 2021 to December 31, 2021, to achieve those control objectives if subservice organizations and user entities applied the complementary controls assumed in the design of Fire and Police Pension Association of Colorado's controls throughout the period January 1, 2021 to December 31, 2021. The criteria we used in making this assertion were that:
- a. The risks that threaten the achievement of the control objectives stated in the description have been identified by management of the service organization;
 - b. The controls identified in the description would, if operating effectively, provide reasonable assurance that those risks would not prevent the control objectives stated in the description from being achieved; and
 - c. The controls were consistently applied as designed, including whether manual controls were applied by individuals who have the appropriate competence and authority.



Section III

Description of Fire and Police Pension Association of
Colorado's System

Overview of Services Provided

About FPPA

The Fire and Police Pension Association of Colorado (FPPA or the Association) was established January 1, 1980, pursuant to the Colorado Revised Statutes of 1973, as amended. FPPA administers a statewide multiple-employer public employee retirement system providing defined benefit plan coverage (Defined Benefit System) for police officers and firefighters throughout the State of Colorado (the State). The Association also administers local defined benefit pension funds for police officers and firefighters hired prior to April 8, 1978, whose employers have elected to affiliate with the Association (Old Hire Plans) and for volunteer fire defined benefit plans (Volunteer Plans). FPPA also administers two funds: the Fire & Police Members' Benefit Investment Fund and the Fire & Police Members' Self-Directed Investment Fund. The Fire & Police Members' Benefit Investment Fund includes the assets of those plans that fall under the complete investment authority of the FPPA Board of Directors. This fund includes the assets of the Defined Benefit System, numerous separate Old Hire and Volunteer Plans, and other FPPA administered plans.

The controls described in this section are related to the local defined benefit pension funds for police officers and firefighters hired prior to April 8, 1978, (Old Hire Plans) whose employers have elected to affiliate with the Association and for volunteer fire defined benefit plans (Volunteer Plans) whose employers have elected to affiliate with the Association. When combined, these plans are referred to as the Affiliated Local Plans.

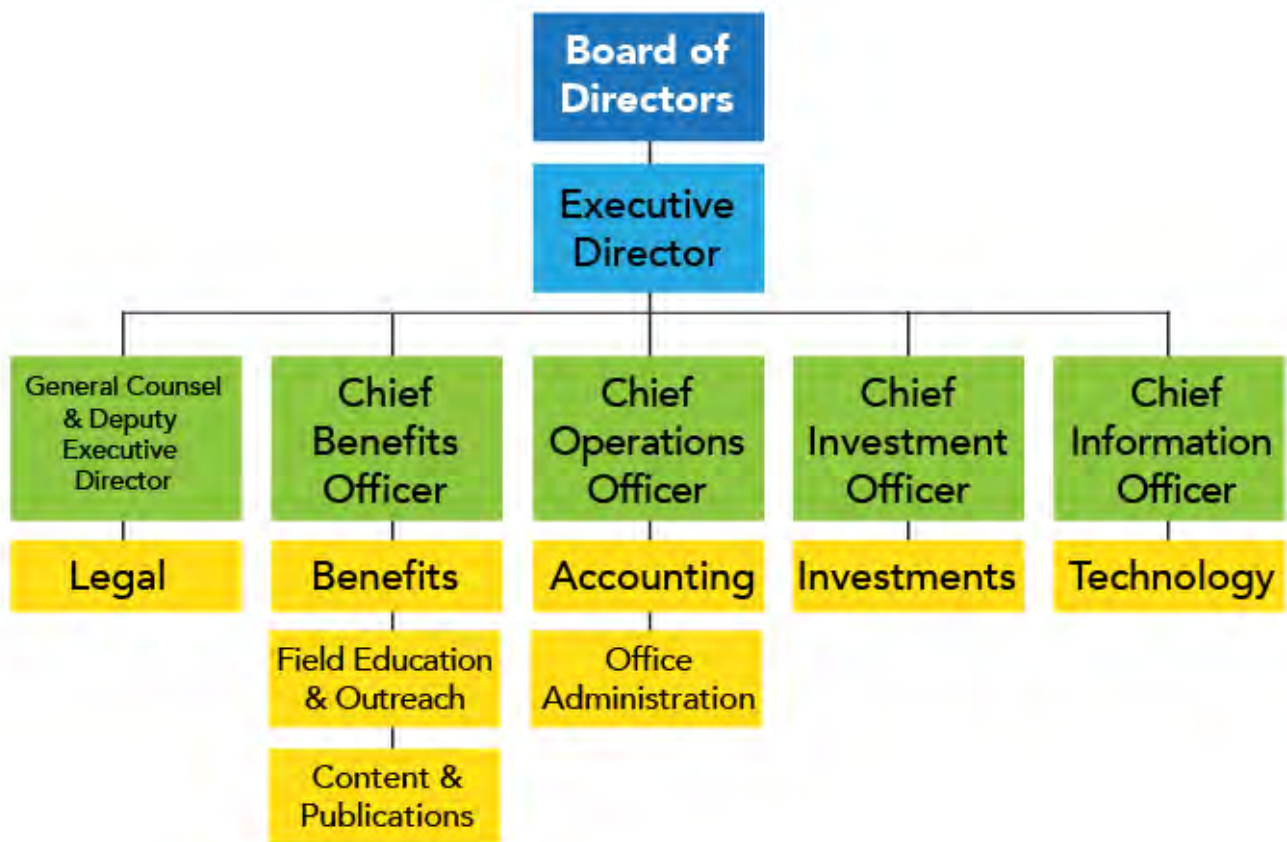
Plan Information

The Affiliated Local Plans are plans for which FPPA has been asked to and has undertaken investment and recordkeeping responsibility, but are not plans for which FPPA has determined or set the benefits or set the funding policy. Benefit and funding decisions are made by each plan's Board and executed by FPPA. Each of the pension plans mentioned above has its assets pooled for investment purposes. All transactions that are specific to each plan (contributions, retirement benefit payments, refunds, etc.) are accounted for by plan. The Old Hire and Volunteer Plans that have chosen to affiliate with FPPA for investment and administrative purposes are still governed by their local plan document or by the Colorado statutes and local pension board, and each has a separate actuarial valuation completed every two years.

Volunteer Plan participants are not compensated and do not contribute to their plan. These plans are mostly funded by a partial mill levy tax base. Many of these plans receive State matching funds if they contribute to their Volunteer Plan. The retirement benefit is generally based on the total assets in the plan. The Colorado State Controller has opined on March 2014 that the State contribution to volunteer firefighter's plans will continue to be treated as a supplemental discretionary payment and will not result in Governmental Accounting Standards Board Statement No. 68 (GASB 68) reporting to the State as a special funding situation.

FPPA’s Organizational Structure

FPPA utilizes a functional organizational structure in which functions are segregated into five divisions according to the type of services to be provided. The divisions are Legal, Benefits, Operations, Information Technology and Investments. The organization is managed by the Executive Director, Deputy Executive Director/General Counsel, Chief Benefits Officer, Chief Operations Officer, Chief Information Officer and Chief Investments Officer. These positions constitute the management team that retains overall responsibility for the daily operations.



Oversight Responsibility

By State statute, the management of the Fire & Police Members' Benefit Investment Fund and the Fire & Police Members' Self-Directed Investment Fund (the Funds) is vested in the Board of Directors of the Fire and Police Pension Association of Colorado. The nine Board members are appointed by the Governor and confirmed by the Senate. The Board is responsible for appointing the Executive Director who is FPPA’s chief administrative officer.

Specific duties of the Board include investing and managing the Funds, disbursing money from the Funds, setting required contribution levels, and determining the award of disability and survivor benefits within the Statewide Death & Disability Plan. The FPPA Board of Directors accomplishes its business at regular meetings, held throughout the year at the Association's Greenwood Village offices, virtually or other conference locations as determined by the Board. The management team reports to the Board at each of the Board’s meetings.

Control Environment, Risk Assessment Process and Monitoring Controls

Control Environment Information

FPPA's Management is responsible for establishing and maintaining the system of internal controls. These controls are designed to comply with Colorado Statutes, Federal requirements and the requirements identified in the pension plan documents. These requirements have been identified and codified in the FPPA Rules & Regulations January 1, 2021, codification. All employees are required to sign a Code of Conduct which defines FPPA's commitment to integrity and ethical values.

Risk Assessment Controls

The Board is responsible for measuring and determining the risks associated with the overall operations of FPPA. For the Affiliated Local Plans, the Board concentrates primarily on investment and actuarial risks. These risks are determined by the internal auditor using a risk assessment process based on the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework. The internal auditor determines the entity level controls risk annually and completes a fraud risk assessment every two to three years.

The investment risks are monitored by the Investment Department. The Board has adopted investment policies that outline the level and type of investment risks that are allowed. The Board has also created an Investment Committee whose membership consists of at least three Board members. The Investment Committee assists the Board in monitoring the implementation of the investment program and ensuring compliance with the investment policies and objectives of the Fund. Investment staff will recommend specific investments based upon an FPPA approved investment policy. Investment staff recommendations will be reviewed by an Internal Investment Committee and a third-party consultant for compliance with FPPA processes and policies.

Actuarial risks are managed through the employment of an independent actuary hired through a competitive bid process. The actuary, Gabriel, Roeder, Smith & Company, performs biennial valuations on Affiliated Local Plans that monitor actuarial experiences and compares them to expected funding levels. Management reviews these reports.

Control Activities

FPPA has policies and procedures that define specific control activities covering participant records, investment activities, financial transactions, reporting, and information technology general controls. These controls are described in detail in Section IV.

Monitoring Controls

On a day-to-day basis, the monitoring of the Association's controls is the responsibility of the management team. Formal checklists exist that detail most of the overall operational controls. All data entry efforts are reviewed by a supervisor or peer. An example of a data entry effort would be new retiree pension payments that are only setup after the completed approved pension form has been received. The benefit setup in the Pension System (Advanced System Pension Network – ASPEN) is confirmed by another employee. The evidence of this review is maintained in ASPEN. Staff reviews all changes to pension benefits, payments, plans, accounts payable invoices, journal entries, bank deposits, reconciliations, time sheets, and wires before final processing occurs. Additionally, employee performance evaluations are used to ensure managerial control of quality and consistent product delivery.

Audits

The FPPA recordkeeping services are subject to periodic internal audits by an independent third party internal audit and advisory firm. The internal audits are determined and conducted using a risk assessment process based on the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework.

Additionally, an independent financial statements audit, awarded on a competitively bid basis, is conducted annually.

Information and Communication

The flow of information and communications within the Association tends to be a balance between formal and informal. Because of the small size of FPPA, communications can be handled quickly and easily via a face-to-face meeting or email as opposed to a written policy directive.

Personnel Controls

FPPA has established procedures covering all critical aspects of employment services including hiring, training, development, performance appraisals, and termination. In addition, all new employees are issued a job description that identifies the various procedural items applicable to their employment duties. Based on the sensitivity of the underlying job, various levels of background checks are performed on applicants prior to their employment. Employees are hired only after their skill sets have been reviewed and deemed sufficient to meet FPPA's requirements. Employee's job performance is reviewed at least annually, and corrective actions are taken if performance lapses are noted.

Ethics

FPPA has annual ethics training for all employees in addition to its code of conduct. The Board has established the following mission statement:

"The Fire & Police Pension Association of Colorado is committed to our members. We will prudently invest their retirement funds, administer benefits impartially, and efficiently provide high quality service."

Management sets the tone at the top by stressing the importance of the Association's mission. This is communicated to staff and members in the way FPPA does business.

Plan Initiation/Modifications

New Plan Initiation and Mergers

Plan administration begins with the request from a new eligible entity. The Board reviews and approves any new local plan affiliation agreements. Once the agreement has been approved by the Board, the details for eligibility, level of service, and benefits are entered into ASPEN, the pension management system for FPPA. These details are reviewed and approved before any transactions take place. New plans are setup in Microsoft Dynamics GP System and in the allocation report. Setup is reviewed by an Accounting Manager on posted journal entries. FPPA will obtain a separate Pension Authorization Form from the participating entity which indicates the name, title, and contact information of the individuals who are authorized to make changes or approve plan transactions. FPPA is not responsible for setting the funding or benefits for these plans as they only act as the plan administrator with the Local Plan Board retaining all funding and benefit authority.

One or more affiliated Volunteer Fire Plans may be merged together to create a new volunteer fire plan for the merged entity. The merged entity will submit a resolution or documentation within the minutes of the board meeting to continue affiliation of the pension plan with FPPA. FPPA will obtain a separate Pension Authorization Form from the merged entity which indicates the name, title, and contact information of the individuals who are authorized to make changes or approve plan transactions. FPPA is not responsible for setting the funding or benefits for these plans as they only act as the plan administrator with the Local Plan Board retaining all funding and benefit authority.

Plan Modifications

Plan modifications for affiliated Volunteer Fire Plans may include benefit improvements and vesting changes. Plan modifications for affiliated Old Hire Plans may include benefit improvements and ad-hoc Cost-of-Living Adjustments. The affiliated plan's Board of Directors requests the change either by resolution or documentation within the minutes of the board meeting. FPPA Operations and Accounting staff uses a checklist to control the process for confirming and processing all requested plan modifications. All plan changes must be submitted to FPPA by an authorized representative of the participating entity. Any change to pension payment amounts are confirmed with the employer by a Payroll team member after first payroll run after changes. Per the Colorado statutes, plan amendments for Old Hire Plans have additional requirements that include permission by the FPPA Board of Directors. All approved changes are then entered into ASPEN, if applicable. These changes are reviewed for accuracy and approved before retiree payroll is processed, if applicable.

Plan Termination and Disaffiliation

Plan termination for Old Hire Plans begins when FPPA or the local board determine that there are no longer any participating members or beneficiaries in the plan. The local plan board and management follow the State statutes to authorize FPPA to distribute the Old Hire Plan assets. Once proper authorization is obtained, including a notice of publication and a plan resolution to distribute the funds, FPPA will calculate and distribute the final plan net asset balance.

Plan disaffiliation for Volunteer Plans begins when FPPA receives a local board resolution of intent to disaffiliate from FPPA. FPPA must receive the resolution at least 60 days prior to the effective date. FPPA will calculate and distribute the final plan net assets within 30 days of the effective date of the disaffiliation. Final calculation of Volunteer Plan net assets to be distributed upon disaffiliation is approved by the COO prior to distribution.

Participant Records

Participant Accounts

For each participant enrolled in an Old Hire Plan, a participant account is maintained in ASPEN. The information maintained in the participant account includes:

- participant's name
- social security number
- address
- hire date
- birth date
- gender
- beneficiary – spouse
- contribution history
- service credits

For each participant enrolled in a Volunteer Plan, a participant account is maintained in ASPEN. There are no participant contributions received for the Volunteer Plans. Pensionable service years are only earned with the completion of a required 36 hours of training each year as established by Colorado statute. Each Volunteer Plan employer is responsible for tracking and reporting the eligibility for all participants to FPPA. The information maintained in the participant account includes:

- participant's name
- social security number
- address (optional)
- hire date
- birth date
- gender
- beneficiary - spouse
- pensionable years of service

Key participant record details are confirmed at least annually with the participating plan management as discussed in further detail below as part of the Annual Review of Participant Records.

Participant Additions and Modifications

Within each Affiliated Local Plan, new participants may be added and modifications may be made to an existing participant's record based on authorized written instructions from the participant or authorized plan contact person. The addition of new participants and the modification of participant data is documented primarily through the web using the FPPA Employer Portal or via other acceptable, written, and verifiable communications. Other changes may be reported on standardized forms such as Change of Address Form, or via the web using the FPPA Employer Portal or the Member Account Portal. The authorized plan contact or the participant is responsible for submitting the necessary forms or correspondence in a timely manner to FPPA. Additionally, FPPA receives death notifications from third-party vendors, Pension Benefit Information (PBI) and Lexis Nexis, and reviews against FPPA participant records. These death notifications are either in the form of notices confirmed by the Social Security Administration or State death records, or obituaries published in media outlets. If discrepancies are noted, FPPA will contact the employer to resolve the differences and modify participant records accordingly.

Upon receipt of the above listed forms or other correspondence from the authorized plan contact or participant, FPPA Accounting staff makes the requested changes. All changes made by FPPA Accounting staff are reviewed and approved by another Accounting staff member to ensure the accuracy of the change. The review and approval process are performed in ASPEN for changes made directly in ASPEN such as a change in benefit amounts while other changes such as a change in the plan document are reviewed and approved outside of ASPEN.

Annual Review of Participant Records

Individual plan management is notified by FPPA to review the participant records at least annually. The review or modification of participant records can be completed via the web using the FPPA Employer Portal connection into ASPEN or via other acceptable, written, and verifiable communications. After the review period is completed, the participant records are compiled into a spreadsheet. The participant records spreadsheet is reviewed by FPPA Operations staff and unusual or significant changes from prior periods are questioned as part of preparing the participant data package sent to the actuary annually for analysis.

Upon receipt of modification of participant records via other communications, FPPA Contributions or Payroll Team staff makes the requested changes in ASPEN. All changes made by FPPA Contributions or Payroll Team staff are reviewed and approved by another FPPA Contributions or Payroll Team staff member to ensure the accuracy of the change.

If the participant records are modified by an employer using the FPPA Employer Portal, the details on the modified record are stored in ASPEN and are reviewable by the FPPA Contributions or Payroll Team. Changes made that satisfy the rules within ASPEN will be processed immediately within the system without review by FPPA staff members. Modified records that do not satisfy the rules within ASPEN are reviewed by Contributions or Payroll Team staff and if acceptable will be modified manually in ASPEN by the Contributions or Payroll Team staff. All changes made by FPPA Contributions or Payroll Team staff are reviewed and approved by another FPPA Contributions or Payroll Team staff member to ensure the accuracy of the change. Examples of modifications that would not satisfy the rules within ASPEN include adding a participant that is already retired in the same plan, or adding a participant that may have portable volunteer service in another plan or is active in another volunteer plan.

This review and approval by Contributions or Payroll team staff is documented electronically in the ASPEN system for changes made in ASPEN or as a manual signoff for changes that are made outside of ASPEN. An example of a change in ASPEN would be changing the pensionable years of service for a volunteer firefighter. An example of a change outside of ASPEN would be updating the details of the participants that would be sent to the actuary to account for known future changes such as retirement dates that have not yet occurred but have been submitted prior to providing the data to the actuary.

Membership Services Records

Individual account information is maintained for each participant for both the Old Hire Plans and Volunteer Plans. Activity posted to these member accounts and for the individual plans includes contributions (State and employer), benefit payments, plan direct expenses, and allocated revenue and expenses. FPPA also provides participant and plan reporting.

Contributions – Old Hire and Volunteer Plans

Contributions for the Old Hire and Volunteer Plans come from the employer as a wire or ACH payment. Wires are sent directly into FPPA's deposit bank. ACH payments are initiated by Contributions team members to be pulled directly from the employer's bank after receiving notification that the employer has authorized the ACH payment via the FPPA Employer Portal. Each contribution received is entered into ASPEN by the employer via the FPPA Employer Portal or a Contributions team member with a deposit record for the total contribution received with the detail of the source of the contribution, the employer or the State. The contribution report records will match to the deposit record in total and the records cannot be processed until they balance. The contributions record in ASPEN is reviewed and approved by a Contributions team member. Monthly, contributions are reconciled by the Senior Accountant between ASPEN totals, the totals in the Microsoft Dynamics GP General Ledger, and the deposit bank. Any discrepancies are researched and corrected generally within the same month. This reconciliation is reviewed and approved by an Accounting Manager.

Contributions – Volunteer Plans State Matching Funds

Volunteer Plans may also receive matching funds from the State. Annually, the State sends funds to FPPA on behalf of the Volunteer Plans via Electronic Funds Transfer (EFT). The payment remittance detail indicates the amounts paid to FPPA as State Funds by employer department or municipality. A Contributions team member inputs these annual payment amounts into a tracking spreadsheet as well as enters the contributions to the employer departments in ASPEN, which are reviewed and approved by another member of the Contributions team. Upon approval of the deposit, the Staff Accountant or Senior Accountant will send an email to the plan notifying them of the contribution they have received from the State. The deposit details (such as amount, department, deposit date, etc.) are compared to the tracking spreadsheet.

The Colorado State Controller opined in March 2014 that the State matching funds contribution to volunteer firefighter's plans will continue to be treated as a supplemental discretionary payment and will not result in GASB 68 reporting to the State as a special funding situation.

Benefit Payments

Benefit payments begin when a participant applies for benefits after all eligibility requirements have been met. The participant will notify their plan management of the decision to receive retirement benefits. The plan will then submit a retirement application form to FPPA. The retirement application is a standard FPPA form, with one specifically designed for use by all Old Hire plans and another designed for use by all Volunteer plans. The retirement application includes the participant name, volunteer pensionable years of service or Old Hire service credit, and the monthly benefit that the participant is eligible to receive, as determined by the plan benefit structure. The retirement application will be signed by the participant and an authorized representative of the plan. Payroll team members will review the submitted retirement application and confirm that the information agrees with FPPA's records. This review, performed by a Payroll team member, includes comparing the volunteer pensionable years of service or the Old Hire service credit, and the expected benefit payment from the retirement application to the amounts recorded in ASPEN. Any differences are investigated and resolved by a Payroll team member before the retirement application is processed. Once the details of the retirement application are confirmed, a Payroll team member will enter the participant retirement information into ASPEN. This setup is then reviewed by another Payroll team member before it is made active. These reviews are documented electronically in ASPEN. Once all new participant benefit payments are setup, the monthly benefit payroll is generated by a payroll staff member.

The Accounting Manager compares the check advice and deposit advice totals on the final payroll balancing report from ASPEN to the payroll dashboard report which contains a summary of the information contained within the payment file to be uploaded to the Deposit Bank and to Microsoft Dynamics GP integration file. An Accounting Manager will review the payroll and, if no errors are noted, approve the payroll run. Most payments are made via direct deposit with a limited number of physical checks being issued. Additionally, the Deposit Bank sends an acknowledgement file listing all the payments it will make on behalf of FPPA via check or direct deposit. Upon receipt of this file, a Payroll team member compares the payment totals to the Payroll Dashboard Report to verify accuracy and completeness of the payments processed. FPPA uses a positive pay system requiring an Accounting Manager to send a file to the deposit bank with the details of the issued checks/direct deposits. The deposit bank uses this file to confirm each transaction as it is received by the deposit bank for payment. The deposit bank account is reconciled monthly by an Accounting Manager to confirm the accuracy of the payments issued.

Direct Plan Expenses

Direct plan expenses are those costs that apply only to a specific plan. These are normally payments requested by an authorized plan administrator to be paid directly by FPPA from plan assets. Once it has been confirmed that the person requesting the payment is an authorized plan administrator, an Accounting Manager will sign off that this verification has occurred. In addition, an Accounting Manager will add the correct General Ledger code for the specific plan and sign the invoice or letter of request. If there are no issues, these expenses are processed the same as direct plan allocated expenses as described below.

Direct Plan Allocated Expenses

FPPA identifies plan expenses that can be attributed to a specific plan or set of plans. Vendors are paid via ACH or check. Purchase orders are used primarily for IT equipment and software purchases. Expenses may be incurred through third-party vendors or by FPPA employees through expense reports. FPPA Staff must complete a travel and expense report in compliance with the FPPA Travel and Expense policy. These expenses are reviewed and approved by an appropriate Executive team member or their designee for budget availability and reasonableness and assigned a General Ledger account code. Once the invoice or expense report has been approved and signed by the appropriate staff member, an Accounting Manager will review the General Ledger account coding. If there are no issues, an Accounting Manager will sign the invoice and add it to the accounts payable items to be paid. If the expense is payable to a new vendor, an Accounts Payable team member will set up the vendor in Microsoft Dynamics GP and another Accounts Payable team member will approve and sign off on the setup after reviewing the applicable vendor information. If the vendor chooses payment via ACH, an Accounting Manager will enter the vendor ACH payment details into the vendor master file and another Accounting Manager will review and sign off on this setup. An Accounts Payable team member enters the approved invoices into Microsoft Dynamics GP and creates a list and total of the invoices to be paid. If the expense originated through a Purchase Order, the appropriate department manager assigns the General Ledger account coding after approving the Purchasing Order. An Accounting Manager will review the General Ledger account coding on the Purchase Order. Once the equipment or services have been received and an invoice is presented by the Vendor, an Accounts Payable team member will match the Invoice against the Purchase Order. Any discrepancies are resolved by an Accounts Payable team member and the invoice is included with all other invoices for payment. The accounts payable checks and EFT Payment Register are generated and compared to the list of total accounts payable invoices to be paid. Differences are reviewed and corrected before payments are released. This reconciliation is reviewed by an Accounting Manager or a designated individual. Once the list and payment registers are reconciled, the payment package is given to an authorized signer for approval. The authorized check signer reviews the payment package which consists of the check or ACH Remittance Form and the approved invoice.

The authorized check signer will sign the check or the ACH Remittance Form if the payment is approved. Approved checks are mailed and approved ACH payments are sent to the bank for processing. FPPA uses a positive pay system requiring an Accounting Manager to send a file to the deposit bank with the details of the issued checks. The deposit bank uses this file to confirm each transaction as it is received by the deposit bank for payment.

If there are any differences noted between the positive pay file and the check being processed, the bank will stop processing and contact FPPA for further instructions. An FPPA Accounting Manager will review the transaction and determine whether to reject or process the check in question. The deposit bank account is reconciled monthly by an Accounting Manager to confirm the accuracy of the payments issued.

Allocated Expenses and Investment Revenues

For each investment pool, the investment related expenses and revenues are allocated to each plan within the pool in proportion to their individual asset base.

All other allocated expenses are allocated to each plan in proportion to their total membership base.

Allocated expenses are general expenses that are for the administration of all pooled plan assets. Investment management fees are paid directly from the custodial bank assets. These fee invoices are reviewed for reasonableness and assigned an expense code within the custodial bank system. These fees are submitted for payment and approved for payment by an authorized approver within the custodial bank web access system. These fees are recorded by the Investment Accountant in the General Ledger on a monthly basis through the custodial bank reconciliation and reviewed for accuracy. All other allocated expenses are reviewed and approved by an Executive team member or their designee for budget availability and reasonableness and assigned a General Ledger account code. Once approved, an Accounting Manager will review the General Ledger account coding. If there are no issues, these expenses are processed for payment through Accounts Payable.

Investment revenue is recorded by the Investment Accountant when earned and posted to the General Ledger. Monthly the investment accounts are reconciled by the third-party managers to the custodial bank to verify the accuracy of the investment activity recorded. The reconciliations are reviewed and approved by Investment personnel.

The monthly allocation of expenses and investment revenue is calculated by a stored procedure in Microsoft Dynamics GP General Ledger. This procedure begins by calculating the Asset Allocation Balance based upon the plan direct total monthly activity plus the prior month ending plan asset balance. The report lists the plan specific activity for the month:

- Beginning Net Asset Balance
- Member Contributions (not applicable to Affiliated Local Plans)
- Service Purchases (not applicable to Affiliated Local Plans)
- Employer Contributions
- Service Reinstatement (not applicable to Affiliated Local Plans)
- State Funding
- Affiliations/Disaffiliations
- Refunds
- Net Benefit Payments
- Plan Directed Expenses
- Direct Allocated Plan Expense/Income
- Over/Under Contributions
- Period Sub-Total (monthly total plan direct revenues and expenses)

The Allocation Report then totals to the Asset Allocation Balance (this is the net assets directly attributed to each plan from the Period Sub-Total and Beginning Net Asset Balance) and the Asset Allocation Percent. The Asset Allocation Percent is the individual plan's Asset Allocation Balance divided by the total of the investment pooled net assets and is used to calculate the allocation of investment related expenses and revenues to each plan for each investment pool.

After the plan direct activity and allocation details total to the Asset Allocation Balance, the Allocation Report lists the allocated pooled plan investment revenues and expenses. As part of the stored procedure for the allocation, the monthly amount that applies to individual plans is derived from the total for each category listed below for each investment pool multiplied by the individual plan's Asset Allocation Percent.

- Interest
- Dividends
- Other Income
- Net Change in Accrued Income
- Unrealized Gain/Loss
- Unrealized Gain/Loss on Securities Lending
- Realized Gain/Loss
- Asset Based Fees
- Investment Department Expenses

After the plan investment expenses and revenues are reported, the Member Headcount and Member Allocation Percent are used to allocate all other expenses. Member Headcount is the total of each plan's active, inactive and retired members. The Member Allocation Percent is the individual plan's Member Headcount divided by the total FPPA pooled headcount (shown on the last page of the Allocation Report).

As part of the stored procedure for the allocation of other expenses, the monthly allocated fees and expenses that apply to individual plans is derived from the total other expenses multiplied by the individual plan's Member Headcount Percent. As a final calculation, the allocated monthly expenses and investment revenue are subtotaled and then added to the Asset Allocation Balance to determine the plan's month-end asset balance as shown below:

- Fees and Expenses
- Period Sub-Total
- Total Ending Balance

These allocated amounts are then posted directly to the individual plan accounts in the Microsoft Dynamics GP accounting system via a journal entry, which are reviewed by an Accounting Manager.

Participant and Plan Reporting

Participants are able to review their account details via the FPPA Member Account Portal.

FPPA uploads the plan specific Allocation Reports to the FPPA Employer Portal for authorized plan contacts to download. The authorized plan contact is requested to review the report and communicate any errors or discrepancies to FPPA in a timely manner.

Annual Report

At year end, the Accounting staff produces the Association's financial statements. These statements are audited by a certified public accounting firm. Financial information needed to prepare these statements is generated from the Microsoft Dynamics GP accounting system and custodial bank reporting system.

Investments

The FPPA Board has established investment policies and objectives to define acceptable levels of risk, asset allocation targets, asset class guidelines, investment performance objectives, and other guidelines governing the management of the investments. The Members' Benefit Investment Fund investments are allocated among three investment pools; the Long-Term Pool, Glide-Path Pool and Short-Term Pool. The Old Hire Plans are allocated among the Glide-Path Pool and Short-Term Pool. All other Plans, including the Volunteer Plans, are allocated to the Long-Term Pool. Investments are chosen based upon Board policy. The Investment staff is responsible for researching and recommending new investment opportunities based upon the resources available and the current investment allocation targets.

General Computer Controls

User Access Administration — New Hires, Terminations, & Transfers

Requests for changes to users' logical access including setting up a new user or a change to an existing user's access rights are made by the user's manager via email or other verifiable written communication. The request will include the specific access rights requested which may be in the form of a request to mirror an existing user's access. Changes to users' logical access, including creating, changing or terminating access is completed once an approved user access request is received by the IT department. FPPA uses role-based security and follows a least access approach to granting user access. Access to deposit and custodial bank accounts is limited to only the staff authorized to perform banking duties.

The human resources department will notify the IT department of all terminations. Upon receiving notice of termination, the IT department will inactivate and remove the terminated user's access to FPPA's IT systems by following the termination procedure. The IT department will notify the Chief Operations Officer to direct the removal of terminated user's access to banking systems, if applicable.

User access and the processing roles within FPPA's systems is initiated and managed by IT staff. It is then reviewed at least annually and approved by the user's manager.

Password & Account Lockout Configurations — FPPA Network & ASPEN

Password and account lockout settings have been configured and implemented to restrict access to the network and ASPEN, and Microsoft Dynamics GP applications.

Passwords are required to have fourteen characters minimum (sixteen characters is recommended) except in cases where systems do not support fourteen characters. In cases where systems can only support passwords with less than the FPPA required number of characters, the maximum number of characters allowed by the system is required. Password complexity will be enforced and shall contain at least three of the following: upper case characters, lower case characters, numbers, or special characters except in cases where systems do not support complex passwords.

Initial/temporary passwords are single-use and are required to be changed upon initial/next user logon. Accounts are locked-out after five invalid logon attempts (where supported). Passwords are changed within 90 days of the last password change. Passwords for active contractor and temporary employee accounts are set to expire every 90 days or to the term of the statement of work. Passwords for shared accounts are changed in a timely fashion following the separation of service of anyone with access to the shared account. Generic/shared accounts to vendor portals that do not have a direct impact to FPPA business can be changed annually with a password length of sixteen characters or more. Passwords cannot be the same as the previous five passwords.

All production level System Administrator passwords are documented in the IT password vault. All generic/shared accounts and service account passwords are documented in the IT password vault. Master passwords for password vaults are changed every 90 days.

FPPA employees' access is based on the Windows Active Directory (AD) password and account lockout group policy settings described above.

Administrative Access

Network administrative access to FPPA systems is restricted to IT staff. The list of network administrators is reviewed and approved quarterly by the Chief Information Officer.

Administrative functions within ASPEN, FPPA's pension administration system, including the ability to create users and assign user access based on roles, is limited to the Chief Information Officer and the internal IT development staff. Administrative access to ASPEN is reviewed at least annually as part of the User Access Administration discussed above.

Administrative functions within Microsoft Dynamics GP, FPPA's General Ledger system, including the ability to create users and assign access based on roles, is limited to the IT staff.

Administrative access to Microsoft Dynamics GP is reviewed at least annually as part of the User Access Administration discussed above.

Administrative functions within the FPPA staff payroll system including the ability to create users and assign user access based on roles, is limited to the Human Resources Director and backup. Administrative access to the FPPA staff payroll system is reviewed at least annually as part of the User Access Administration discussed above.

Access to the production databases that support the ASPEN and Microsoft Dynamics GP systems are restricted to IT staff.

Administrative functions within banking systems including the ability to set up modify or remove user accounts and access based on roles is limited to specific approved users. The Chief Operations Officer and the Chief Information Officer are administrators of the Wells Fargo Bank system with dual authorization controls. The Executive Director, Chief Operations Officer, and the Chief Investment Officer are administrators of the Bank of New York Mellon (BNY) system. Administrative access to the banking systems is reviewed at least annually as part of the User Access Administration discussed above.

Change Management

A software-based change management system called SCOUT manages the change management process for ASPEN. Using SCOUT allows application users to submit tickets for known issues and requested enhancements through the ASPEN application. These tickets are known as Problem Incident Reports or PIRs in SCOUT. Following the change management process steps, PIRs are reviewed, evaluated, prioritized and approved for processing by the Chief Information Officer or Applications Manager. After the request is approved, resources as well as a projected start date for the work are assigned. This review is designed to prevent unauthorized changes from being introduced.

The development prompted by the change requests is executed and tested by the IT development staff. At the point where the development staff is creating solution changes and checking them into the Team Foundation Services (TFS) code management solution to be part of the code build, all members of the ASPEN development team are able to see the changes as highlighted differences and review them through code reviews to understand the changes and vet the coding for accuracy. The code reviews also allow IT development staff to review for unauthorized changes. Any changes that are discovered that would be deemed as unauthorized can be removed altogether or further refined to be within scope of the driving PIR. If code changes are being introduced that do not correspond to the assigned PIR, or are being developed at a point in time not congruent with the ticket, the changes would be identified and resolved through corrective actions during the code reviews. An action plan is established with the Chief Information Officer or the Applications Manager to make and execute the necessary corrections.

The approved development changes are elevated to the user test environment and are then tested by the user(s) requesting the change. A series of solution builds and rounds of testing help further validate the solution before a final build is created. Once the changes are approved by the user(s), the change is incorporated into the production build.

The final build is performed by either of the two IT development staff and not by any external contractors. The final build is then stored in a secure location. Each build document includes all the approved changes and is reviewed and approved for promotion to production by the Chief Information Officer prior to deployment. During the pre-determined down-time window, the updated solution is deployed by the assigned FPPA developer. The ability to implement ASPEN application changes within the Production environment is restricted to two IT development staff. This ensures that the updated solution being deployed to the production servers is the approved solution that was built by FPPA staff.

Builds are generally deployed to production on a monthly basis. However, changes may be promoted to production between the monthly packages or changes may wait for more than a month to be promoted depending on the urgency of the issue being corrected.

FPPA does not have access to the source code for Microsoft Dynamics GP. Changes made to this system includes vendor supplied patches, configuration of new features or new/changed reporting functionality. All changes are reviewed by an Accounting Manager and applied by FPPA IT staff.

FPPA also contracts with a third-party service to perform an annual security assessment and penetration test. During this test, various aspects of network security are tested and assessed. Deficiencies and recommendations are supplied in a final report that is summarized and presented to the FPPA Audit Committee. The FPPA IT staff reviews these recommendations and the Chief Information Officer determines if there are other mitigating controls that protect the identified vulnerabilities, or if the recommendations will be either resolved, or if future projects will be required for mitigation. These accepted recommendations are logged in a spreadsheet and tracked as they are remediated.

Independent third-party security assessment and penetration testing is performed annually. Deficiencies and recommendations resulting from the assessment are presented to the FPPA Audit Committee and are tracked by the Chief Information Officer for remediation.

Other security controls that FPPA deploys include the use of perimeter firewalls, web application firewalls, intrusion prevention systems, server monitoring and log aggregation for 24x7 review by Arctic Wolf which is a Managed Security Service Provider (MSSP). Patch deployment is managed through an enterprise wide patch management system. Vulnerabilities from missing patches are reported on a monthly cycle from a vulnerability scanner in order to prioritize patching and remediation efforts.

Backup and Recovery

FPPA has two separate backup processes. The first backup process leverages a removable media system. This backup captures any changes to the servers since the previous backup. Backups can be weekly, daily or every few hours depending on the volatility of the data on each server. Servers that house data with daily or more frequent change rates are backed up at least nightly. The removable media is located at the colocation facility for secure storage. A new set of removable storage media is rotated into service weekly. Five sets of removable media are maintained. The second backup process is an online replication of all mission critical servers by taking a Storage Area Network (SAN) level image which includes the ASPEN and Microsoft Dynamics GP data sets. These replications are scheduled to occur daily, with more volatile data being captured every two hours. These SAN images are replicated to redundant equipment at a secondary site. Backups are tested at least annually to confirm they are working and systems can be recovered.

Physical Access

FPPA is located in Greenwood Village, Colorado. Upon entering the facility, there are seven entrances into the FPPA office suite. The front desk area has a receptionist on duty during normal office hours and monitors all visitors. Visitor access to the FPPA suite is only granted with the approval of an FPPA staff member. Visitors are issued a "VISITOR" badge which must be worn while in the FPPA office. The remaining entrances to the office space beyond the receptionist are locked. Five of the doors are electronic key card controlled access doors. These doors can only be opened with a valid electronic key card issued to current FPPA staff and contractors. The remaining two doors are not used for incoming traffic and remain locked.

Effective March 20, 2021, the FPPA production servers were moved to a colocation facility in Centennial Colorado owned by Flexential. All physical access is controlled by on-site security controls provided by the colocation vendor. Environmental protections, electrical service and networking are all provided by the vendor. Redundant equipment maintained for disaster recovery is located at the centralized office at FPPA. The FPPA server room has a cypher lock that restricts physical access. Only IT staff is authorized to access the server room and the colocation facility. Other vendors, contractors or other unauthorized staff must be accompanied by an IT staff member and signed in to a log sheet before being allowed access. The FPPA server room is protected by environmental monitoring to warn of temperature, water, humidity, smoke and physical access. A camera is also integrated to review movement within the server room. A generator and uninterruptable power supply are also employed to protect against power outages.

Subservice Organizations

FPPA utilizes subservice organizations to perform certain functions to improve operating and administrative effectiveness. The subservice organizations are carved out; therefore, the accompanying description includes only policies, procedures, and control objectives of FPPA and does not include policies, procedures, and control objectives at the various service organizations described below. The examination of the independent service auditors did not extend to policies and procedures at these subservice organizations. The most significant subservice organizations used by FPPA are shown below.

Fire and Police Pension Association of Colorado

Description of System

January 1, 2021 to December 31, 2021

The achievement of certain FPPA control objectives is dependent upon whether certain controls at the subservice organizations were suitably designed and operating effectively throughout the period. As such, the following list represents the controls performed at the subservice organizations which are anticipated in the design of FPPA's system and for which are needed to meet certain control objectives:

| Type of Services Provided | Subservice Organization Name | Complementary Subservice Organization Controls | Relevant Control Objectives |
|--|-------------------------------------|---|--|
| FPPA relies on Wells Fargo Bank's treasury management services for transaction clearing house services, wire transfers, controlled disbursement account, desktop deposit, and payment and receivables manager. | Wells Fargo Treasury Management | <ol style="list-style-type: none"> 1. Controls in place for all logical and physical access to Wells Fargo Treasury Managements system. 2. Controls in place to ensure that transaction clearing house services, wire transfers, and disbursements are processed accurately, completely and timely. | Control Objective 2 - Contributions. Control Objective 3 - Disbursements. Control Objective 6 - Retirement Plan Cash Movements |
| FPPA relies on Arctic Wolf, Inc. for network security and monitoring including perimeter firewalls, web application firewalls, intrusion prevention systems, server monitoring, and log aggregation. | Arctic Wolf, Inc. | <ol style="list-style-type: none"> 1. Controls in place to provide reasonable assurance that logical access to programs, data, and computer resources is restricted to authorized and appropriate individuals and appropriately documented. 2. Controls in place to provide reasonable assurance that application changes are appropriately documented, tested, and approved. | Control Objective 8 - Logical Access Controls. Control Objective 9 - Configuration Management. |

Fire and Police Pension Association of Colorado

Description of System

January 1, 2021 to December 31, 2021

| Type of Services Provided | Subservice Organization Name | Complementary Subservice Organization Controls | Relevant Control Objectives |
|---|-------------------------------------|---|--|
| <p>FPPA relies on Flexential Corporation for co-location services including hosting servers, providing internet connectivity, and data backup and disaster recovery.</p> | <p>Flexential Corporation</p> | <p>1. Controls in place for all physical access to the Flexential location.</p> | <p>Control Objective 11 - Physical Access</p> |
| <p>FPPA relies on BNY Mellon Bank for investment processing, accounting and asset custodial services for the investments in the Fire & Police Members’ Benefit Investment Fund, and for portfolio administration services including effectuating capital calls.</p> | <p>Bank of New York Mellon</p> | <p>1. Controls in place to provide reasonable assurance that trades and other cash movements are processed in a complete, accurate and timely manner. 2. Controls in place to provide reasonable assurance prices and net asset values are received from an authorized source and are recorded in a complete, accurate, and timely manner. 3. Controls in place to provide reasonable assurance reconciliations between plan records and trust records are performed in a complete, accurate, and timely manner. 4. Controls in place to provide reasonable assurance that capital calls are effectuated completely, accurately, and timely.</p> | <p>Control Objective 4 - Retirement Plan Income and Expense Allocations. Control Objective 6 - Retirement Plan Cash Movements</p> |

Fire and Police Pension Association of Colorado

Description of System

January 1, 2021 to December 31, 2021

| Type of Services Provided | Subservice Organization Name | Complementary Subservice Organization Controls | Relevant Control Objectives |
|--|---|--|---|
| FPPA relies on Hamilton Lane for portfolio administration services including reporting on private markets investment strategy assets. | Hamilton Lane | 1. Controls in place to provide reasonable assurance that private markets investment strategy assets are reported on completely, accurately, and timely. | Control Objective 4 - Retirement Plan Income and Expense Allocations. Control Objective 6 - Retirement Plan Cash Movements |
| FPPA relies on Gabriel, Roeder Smith & Company (GRS) for actuarial services related to biennial actuarial valuations for Affiliated Local Plans that report the actuarial determined contribution plan experience and plan funded status. GRS also provides annual GASB 68 reports for Affiliated Local Plans that provide accounting schedules required under GASB Statement No. 68 "Employer Reporting for Pension Plans". | GRS & Company | 1. Controls in place to provide reasonable assurance that the actuarial information provided is complete, accurate and timely. 2. Controls in place to provide reasonable assurance that the annual GASB 68 reports provided are complete and accurate. | Control Objective 7 - Annual Review of Participant Records |
| FPPA relies on Pension Benefit Information and LexisNexis for death monitoring activities. | Pension Benefit Information (PBI) LexisNexis | 1. Controls in place to provide reasonable assurance that death monitoring reports provided are complete and accurate. | Control Objective 5 - Participant Record Changes |

FPPA relies on GRS as a management expert providing actuarial services. GRS provides a certification letter with each of the reports on the Affiliated Local Plans. For all other subservice organizations, FPPA annually obtains and reviews the issued Service Organization Controls reports noting any exceptions reported for the control objectives or trust criteria. If any significant exceptions are noted related to FPPA contracted services, FPPA staff will follow up with the service organization to determine if any other mitigating controls or processes were completed and to assess if FPPA staff needs to perform any additional mitigating processes. FPPA also evaluates the listed complementary user entity controls within these Service Organization Controls reports to ensure FPPA is properly managing and reviewing the services provided. In general, complementary user controls include proper user access updates and review, proper data backup and recovery procedures, and review of provided output reports for completeness and accuracy.

These types of controls are part of FPPA's general processes and are described above as well as included as part of the Tests of Operating Effectiveness of Controls. To the extent any additional specific complementary user entity controls related to these services is considered a key control to meet the control objectives listed below, FPPA has included the control to be tested as part of the Tests of Operating Effectiveness of Controls.

Complementary User Entity Controls

FPPA controls were designed with the assumption that certain controls would be implemented at the plan level by participating employers. In certain situations, the application of specific controls at the employer level is necessary to achieve the identified control objectives listed within this report. In such instances, the required employer level controls are identified under the control objective in Section IV of this report.

This section describes additional controls that should be in operation at the Old Hire Plan and Volunteer Plan level to complement the controls in operation at FPPA. User auditors should consider whether the following controls have been placed in operation at the plan level:

Control Objective 1 - Plan Setup and Administration

- The Board of Volunteer Plans is responsible for reviewing and approving the plan details including changes to plan benefits.
- The Board of Volunteer Plans is responsible for designating the individuals who can review and approve changes to the plan, submit participant retirement requests and confirm pensionable years of service and compliance with participant eligibility requirements.
- The Board of the Old Hire Plans is responsible for reviewing and approving the plan details including changes to plan benefits.
- The Board of Old Hire Plans is responsible for designating the individuals who can review and approve changes to the plan, submit participant retirement requests and confirm service and compliance with participant eligibility requirements.

Control Objective 2 - Contributions

- Municipalities/Districts or the Board of Old Hire Plans and Volunteer Plans are responsible to meet the financial obligations set forth by their plan documents and any required financial reporting.
- Municipalities/Districts or the Board of Old Hire Plans and Volunteer Plans are responsible for reviewing and completing contribution amounts or participant service data on an individual or group basis in a timely manner when requested by FPPA.
- Authorized plan contacts are responsible for submitting contributions reports through the FPPA Employer Portal.

Control Objective 3 - Disbursements

- Authorized plan contacts are responsible for reviewing and approving the retirement application before a withdrawal or retirement disbursement is processed by FPPA.
- Participants are responsible for reviewing FPPA notification and retirement letters and communicating any discrepancies or concerns to FPPA.
- Authorized plan contacts are responsible for reviewing financial information and individual participant statements used in the completion of their financial statements for reasonableness and notifying FPPA of any errors.
- Authorized plan contacts are responsible for reviewing and approving any plan specific expenses submitted to FPPA for payment.

Control Objective 4 – Retirement Plan Income and Expense Allocations

- Authorized plan contacts are responsible for reviewing financial information and individual participant statements used in the completion of their financial statements for reasonableness and notifying FPPA of any errors.

Control Objective 5 –Participant Record Changes

- Participants are responsible for reviewing FPPA notification and retirement letters and communicating any discrepancies or concerns to FPPA in a timely manner.
- Authorized plan contacts are responsible for reviewing financial information and individual participant statements used in the completion of their financial statements for reasonableness and notifying FPPA of any errors.
- Municipalities/Districts or the Board of Old Hire Plans and Volunteer Plans are responsible for maintaining up to date membership data and communicating changes to FPPA including, but not limited to, changes in spouse, remarriage of survivors and member or survivor death.
- Municipalities/Districts or the Board of Old Hire Plans and Volunteer Plans are responsible for designating an authorized plan contact and notifying FPPA of plan contact changes.

Control Objective 6 – Retirement Plan Cash Movements

- Authorized plan contacts are responsible for reviewing financial information and individual participant statements used in the completion of their financial statements for reasonableness and notifying FPPA of any errors.

Control Objective 7 – Annual Review of Participant Records

- Authorized plan contacts are responsible for reviewing FPPA participant records and communicating any discrepancies or concerns to FPPA in a timely manner.

Control Objective 8 – Logical access controls

- Municipalities of Old Hire Plans are responsible for designating an authorized plan contact that can access FPPA systems and notifying FPPA of any changes required in user access including removal of access in a timely manner.

The list of Old Hire Plan and Volunteer Plan level entity controls presented above and those presented with certain specified control objectives do not represent a comprehensive set of all of the controls that should be employed by Municipalities/Districts or Boards. Other controls may be required at the municipal or volunteer plan level.



Section IV

Control Objectives and Related Controls, Tests of Operating Effectiveness and Results of Tests
Provided by the Independent Service Auditor and
Fire and Police Pension Association of Colorado

Purpose and Objectives of the Independent Service Auditor's Examination

This report on the controls placed in operation and tests of operating effectiveness applicable to Fire and Police Pension Association of Colorado is intended to provide interested parties with information sufficient to obtain an understanding of those aspects of Fire and Police Pension Association of Colorado's controls that may be relevant to a user entity's internal controls over financial reporting. This report, when coupled with an understanding of internal controls in place at user entities and subservice organizations, is intended to assist in the assessment of the total internal controls applicable to the transactions processed by Fire and Police Pension Association of Colorado for user entities.

Our examination was restricted to the selected services, control objectives and related procedures specified by Fire and Police Pension Association of Colorado in the controls and testing in Section IV, and were not extended to procedures in effect at user entities and subservice organizations. Fire and Police Pension Association of Colorado specified its control objectives and is responsible for identifying its controls to meet those objectives.

The examination was conducted in accordance with the Statements on Standards for Attestation Engagements, Reporting on Controls at a Service Organization (Type 2), of the American Institute of Certified Public Accountants. It is each interested party's responsibility to evaluate this information in relation to internal controls in place at each user entity to obtain an overall understanding of internal controls to assess control risk. The user entity and Fire and Police Pension Association of Colorado's portions of the control structure must be evaluated together. If effective user entity internal controls are not in place, Fire and Police Pension Association of Colorado's controls may not compensate for such weaknesses.

A system of internal control is intended to provide reasonable, but not absolute, assurance that the control objectives are achieved. The concept of reasonable assurance recognizes that the cost of a system of internal control should not exceed the benefits expected to be derived and also recognizes that the evaluation of the cost-benefit relationship requires estimates and judgments by management.

Our tests of the effectiveness of controls included such tests as were considered necessary in the circumstances to evaluate whether those controls, and the extent of compliance with them, were sufficient to provide reasonable, but not absolute, assurance that the specified control objectives were achieved throughout the period from January 1, 2021 to December 31, 2021. Our tests of the operational effectiveness of controls were designed to cover a representative number of events for each of the controls listed in Section IV which are designed to achieve the specific control objectives, also listed in Section IV. In selecting particular tests of the operational effectiveness of controls, we considered (a) the nature of the items tested, (b) the types and competence of available evidential matter, (c) the nature of the audit objectives to be achieved, (d) the assessed level of control risk and (e) the expected efficiency and effectiveness of the test.

Description of Testing Procedures

Test procedures performed in connection with determining the operational effectiveness of controls detailed in the matrices in Section IV are described below:

| Test | Description |
|---------------|---|
| Inquiry | Inquired of appropriate personnel to ascertain their knowledge and understanding of the compliance of the controls. Inquiries were performed on all controls. However, the test is not listed individually for every control shown in the accompanying matrices. |
| Observation | Observed application of specific control activity. |
| Inspection | Inspected documents and reports indicating performance of the specific control activity. |
| Reperformance | Reperformed application of the specific control activity. |

Within the testing procedures, sampling refers to non-statistical sampling methods and techniques. Likewise, when referring to a selection of items, such selection was not based on sampling methods and techniques.

Exceptions, if any, noted by Eide Bailly LLP, regarding the adequacy of the controls identified to achieve the stated objective or the level of compliance with the controls are presented in this section under the caption "Results of Testing".

In certain situations, the application of specific controls at the user entity and subservice organizations is necessary to achieve certain control objectives included in this report.

1. Plan Setup and Administration

Controls provide reasonable assurance that new retirement plans, changes to, or dissolution of existing retirement plans are established accurately and completely and are properly authorized.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|---|--|
| 1.1 | New pension plan affiliations must be approved by the FPPA Board. | 1. Inspected supporting documentation for a sample of new pension plan affiliations to evidence that new pension plan affiliations must be approved by the FPPA Board. | Note: No occurrences were noted during the testing period. Eide Bailly LLP inquired about the new pension plan affiliation approval process to gain an understanding of how the control would work had there been an occurrence. |
| 1.2 | Volunteer Plans - New plan setup and changes of plan details are made in ASPEN by the Office Coordinator. All new plans details are reviewed to ensure accuracy of the setup by the Senior Accountant. | <p>1. Inspected supporting documentation for a sample of new volunteer plans to evidence that new plan setups are made in ASPEN by the Office Coordinator and that all new plans details are reviewed to ensure accuracy of the setup by the Senior Accountant.</p> <p>2. Inspected supporting documentation for a sample of changes to volunteer plan details to evidence that changes of plan details are made in ASPEN by the Office Coordinator and that all new plans details are reviewed to ensure accuracy of the setup by the Senior Accountant.</p> | <p>Testing Step 1: Note: No occurrences were noted during the testing period. Eide Bailly LLP inquired about the new plan setup process to gain an understanding of how the control would work had there been an occurrence.</p> <p>Testing Step 2: No exceptions noted.</p> |
| 1.3 | Volunteer Plans – Merged plans submit a resolution or documentation within the minutes of the board meeting electing to remain affiliated with FPPA. | 1. Inspected supporting documentation for Volunteer Plan mergers in the current year to evidence that continued affiliation with FPPA of the Volunteer Plan is approved by the Plan’s Board. | Note: No plans were merged during the audit period which would be subjected to testing. Eide Bailly LLP inquired about the process to merge plans to gain an understanding of how the controls would work had there been a merged plan during the period. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|---|--|
| 1.4 | Plan modifications including benefit improvements and ad-hoc cost-of-living adjustments to Old Hire plans and benefit improvements and vesting changes to Volunteer Plan pension benefits are approved by the appropriate Board. | <p>1. Inspected supporting documentation for a sample of Old Hire Plan modifications to evidence that plan modifications including benefit improvements and ad-hoc cost-of-living adjustments to Old Hire pension benefits are approved by the Plan's Board.</p> <p>2. Inspected supporting documentation for a sample of Volunteer Plan modifications to evidence that plan modifications including benefit improvements and vesting changes to Volunteer Plans pension benefits are approved by the Plan's Board.</p> | No exceptions noted. |
| 1.5 | New plan is setup in Microsoft Dynamics GP System and in the allocation report. Setup is reviewed by an Accounting Manager. | 1. Inspected supporting documentation for a sample of new plans to evidence that the new plan is setup in the Microsoft Dynamics GP System and in the allocation report and that the setup is reviewed by an Accounting Manager. | Note: No occurrences were noted during the testing period. Eide Bailly LLP inquired about the new pension plan process to gain an understanding of how the control would work had there been an occurrence. |
| 1.6 | FPPA will distribute net assets as directed by the Old Hire Plan local board and per State Statutes when the plan is determined to no longer have participating members or beneficiaries. | 1. Inspected supporting documentation for all Old Hire Plans that were determined to no longer have participating members or beneficiaries to evidence that FPPA will distribute net assets as directed by the Old Hire Plan local board and per State Statutes. | No exceptions noted. |
| 1.7 | FPPA will distribute Volunteer Plan net assets within 30 days of the effective date of a resolution by the local board to disaffiliate from FPPA. Final calculation of Volunteer Plan net assets to be distributed upon disaffiliation is approved by the COO prior to distribution. | 1. Inspected supporting documentation for all Volunteer Plans that disaffiliated from FPPA to evidence that FPPA will distribute Volunteer Plan net assets within 30 days of the effective date of a resolution by the local board to disaffiliate from FPPA and the final calculation of Volunteer Plan net assets to be distributed upon disaffiliation is approved by the COO prior to distribution. | Note: No occurrences were noted during the testing period. Eide Bailly LLP inquired about the distribution of Volunteer Plan net assets process to gain an understanding of how the control would work had there been an occurrence. |

2. Contributions

Controls provide reasonable assurance that plan contributions are processed accurately and completely.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|---|----------------------|
| 2.1 | Contributions are received by wire or preauthorized ACH. On a daily basis, contributions entered by the employer in the Employer Portal are reviewed and approved by a Contribution team member to ensure accuracy. | 1. Inspected approvals for a sample of contribution deposits to evidence that contributions entered into the system are reviewed and approved by a Contribution team member. | No exceptions noted. |
| 2.2 | <p>Volunteer Plans - State Department of Local Affairs (DOLA) will send payments with remittance detail of the amounts that they are paying for each local pension plan.</p> <p>Contribution amounts are entered by a member of the Accounting team which is reviewed and approved by another member of the Accounting team. Upon approval of the deposit, the Senior Accountant will send a confirmation email to the plan notifying them of receipt of state matching funds posted to the plan.</p> | <p>1. Inspected supporting documentation for a sample of state matching contributions to evidence that contribution amounts are entered by a member of the accounting team which is reviewed and approved by another member of the accounting team.</p> <p>2. Inspected supporting documentation for a sample of state matching contributions to evidence that the senior accountant sends a confirmation email to the plan notifying them of receipt of state matching funds posted to the plan.</p> | No exceptions noted. |
| 2.3 | The Senior Accountant performs a monthly reconciliation of the total deposits from all sources to the bank and Microsoft Dynamics GP System. This reconciliation is reviewed and approved by an Accounting Manager. | 1. Inspected a sample of months to evidence that the Senior Accountant performs a monthly reconciliation of the total deposits from all sources to the bank and Microsoft Dynamics GP System and that the reconciliation is reviewed and approved by an Accounting Manager. | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|---|---|--|---------------------------|
| 2.4 | Contribution journal entries into the General Ledger are reviewed and approved by an Accounting Manager. | 1. Inspected Contribution Journal entries for a sample of months to evidence that Contribution Journal entries are reviewed and approved by an Accounting Manager. | No exceptions noted. |
| 2.5 | FPPA management receives Service Organization Control reports from subservice organizations. FPPA management reviews these reports for areas of concern and complementary user entity controls. | 1. Inspected SOC reports and management monitoring documentation to evidence that management receives the SOC reports from subservice organizations annually, and reviews the reports for opinion modification, exceptions and complementary user entity controls to identify any follow up procedures needed. | No exceptions noted. |

3. Disbursements

Controls provide reasonable assurance that retirement plan disbursements are processed accurately and completely, and are properly authorized.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|---|----------------------|
| 3.1 | New retiree pension payments are only setup by a Payroll team member in ASPEN once the completed approved pension form has been received. The benefit setup is approved by a separate Payroll team member in ASPEN. | <p>1. Inspected supporting documentation for a sample of new pension payments to evidence that the new retiree pension payments are only setup by a Payroll team member in ASPEN once the completed approved pension form has been received.</p> <p>2. Inspected supporting documentation for a sample of new pension payments to evidence that the benefit setup is approved by a separate Payroll team member in ASPEN.</p> | No exceptions noted. |
| 3.2 | Staff completes a monthly payroll checklist detailing the required process steps and review and reconciliation controls of key steps. The monthly payroll checklist incorporates action and related sign offs by Payroll Accountant, Payroll team members and Accounting Managers. An Accounting Manager reviews and approves retiree payroll before it is processed. | <p>1. Inspected the payroll checklists for a sample of months to evidence that staff completes a monthly payroll checklist detailing the required process steps and review and reconciliation controls of key steps.</p> <p>2. Inspected the payroll checklists for a sample of months to evidence that an Accounting Manager reviews and approves retiree payroll before it is processed by signing the payroll checklist.</p> | No exceptions noted. |
| 3.3 | After the payroll is authorized, payments are created. Payments are generated in ASPEN by a Payroll team member and approved by an Accounting Manager. | 1. Inspected the payroll checklists for a sample of months to evidence that payments are generated in ASPEN by a Payroll team member and approved by an Accounting Manager. | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|--|----------------------|
| 3.4 | <p>Monthly, an Accounting Manager compares the check advice and deposit advice totals on the final payroll balancing report from ASPEN to the payroll dashboard. Any discrepancies are reviewed and resolved before the payment file is transmitted to the Deposit Bank. The Deposit Bank sends an acknowledgement file listing all the payments it will make on behalf of FPPA and a Payroll team member compares the payment totals to the payroll dashboard report to verify accuracy and completeness of the payments processed.</p> | <ol style="list-style-type: none"> 1. Inspected the payroll checklists for a sample of months to evidence that an Accounting Manager compares the check advice and deposit advice totals on the final payroll balancing report from ASPEN to the payroll dashboard report and any discrepancies are reviewed and resolved before the ACH and Check files are transmitted to the Deposit Bank. 2. Inspected the payroll checklists for a sample of months to evidence that a payroll team member compares payment totals on the acknowledgement file from the Deposit Bank to the payroll dashboard report to verify accuracy and completeness of the payments processed. | No exceptions noted. |
| 3.5 | <p>Monthly, a Payroll team member integrates the payroll journal entry from ASPEN to the Microsoft Dynamics GP system using the payroll clearing account. The bank file is posted to the Microsoft Dynamics GP system using the payroll clearing account. The zeroing out of the payroll clearing account demonstrates that the payroll activity has been posted completely. An Accounting Manager reviews this process, with any differences investigated and corrected, then approved.</p> | <ol style="list-style-type: none"> 1. Inspected reconciliations for a sample of months to evidence that the payroll clearing account is zeroed out. 2. Inspected reconciliations for a sample of months to evidence that an Accounting Manager reviews this process, with any differences investigated and corrected, then approved. | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|--|----------------------|
| 3.6 | Invoices are approved by relevant department managers before they are paid. If the purchase is initiated through a Purchase Order, the relevant department manager approves the Purchase Order and assigns the appropriate General Ledger account coding before it is sent to the Vendor for fulfillment. | 1. Inspected supporting documentation for a sample of payments to evidence that invoices are approved by relevant department managers before they are paid and if the purchase is initiated through a Purchase Order, the relevant department manager approves the Purchase Order and assigns the appropriate General Ledger account coding before it is sent to the Vendor for fulfillment. | No exceptions noted. |
| 3.7 | New vendor setups are entered by an AP team member and reviewed and approved by another AP team member. Vendor ACH payment details are entered by an Accounting Manager and reviewed by another Accounting Manager. | 1. Inspected the vendor checklists for a sample of new vendors to evidence that new vendor setups are entered by an AP team member and reviewed and approved by another AP team member. 2. Inspected the vendor checklists for a sample of new ACH vendors to evidence that ACH payment details are entered by an Accounting Manager and reviewed by another Accounting Manager. | No exceptions noted. |
| 3.8 | An Accounting Manager reviews and approves the GL coding of all AP transactions before they are processed in Microsoft Dynamics GP System. | 1. Inspected invoices for a sample of direct and allocated expense payment dates to evidence that an Accounting Manager reviews and approves the GL coding of all AP transactions before they are processed in Microsoft Dynamics GP System. | No exceptions noted. |
| 3.9 | Once the approved invoices have been entered into the Microsoft Dynamics GP System, a list is created to compare the total of the AP invoices entered to the actual invoice amounts. The list comparison is performed by an AP team member and reviewed by another AP team member. | 1. Inspected AP Processing Checklists for a sample of direct and allocated expense payment dates to evidence that a list is created to compare the total of the AP invoices entered to the actual invoice amounts by an AP team member and reviewed by another AP team member. | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|--|----------------------|
| 3.10 | After AP checks are printed and the EFT Payment Register is generated, an AP team member compares the payment registers to the list of the total invoices from above control. Differences are reviewed and corrected before payments are released. This reconciliation is reviewed by an Accounting Manager or a designated individual. | <p>1. Inspected AP Processing Checklists for a sample of direct and allocated expense payment dates to evidence that an AP team member compares payment registers to the list of the total invoices.</p> <p>2. Inspected AP Processing Checklists for a sample of direct and allocated expense payment dates to evidence that differences in the payment register reconciliation are reviewed and corrected before payments are released and the reconciliation is reviewed by an Accounting Manager or a designated individual.</p> | No exceptions noted. |
| 3.11 | Authorized check signer reviews the payment package which consists of the check or ACH Remittance Form and the approved invoice. The authorized check signer will sign the check or the ACH Remittance Form if the payment is approved. Approved checks are mailed and approved ACH payments are sent to the bank for processing. | <p>1. Inspected AP Processing Checklists for a sample of direct and allocated expense payment dates to evidence that the authorized check signer reviews the payment package which consists of the check or ACH Remittance Form and approved invoice.</p> <p>2. Inspected AP Processing Checklists for a sample of direct and allocated expense payment dates to evidence that the authorized check signer will sign the check or the ACH Remittance Form if the payment is approved.</p> <p>3. Inspected AP Processing Checklists for a sample of direct and allocated expense payment dates to evidence that approved checks are mailed and approved ACH payments are sent to the bank for processing.</p> | No exceptions noted. |
| 3.12 | FPPA uses positive pay with the Deposit Bank. Once checks are issued, an Accounting Manager or another Payroll team member verifies the upload detail to the checks issued and transmits the file to the bank. The file details the check amounts and numbers. | 1. Inspected AP Processing Checklists for a sample of direct and allocated expense payment dates to evidence that FPPA uses positive pay with the Deposit Bank and once checks are issued, an Accounting Manager or another Payroll team member verifies the upload detail to the checks issued and transmits the file to the bank and that the file details the check amounts and numbers. | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|--|----------------------|
| 3.13 | Employee travel related expenses or employee reimbursable expenses are submitted on paper using the FPPA Expense Report or electronically using a cloud based expense report. Each report is approved by the employee's manager. FPPA Staff must complete a travel and expense report in compliance with the FPPA Travel and Expense policy. | <p>1. Inspected expense reports and the travel and expense policy for a sample of employee incurred expenses to evidence that:</p> <p>A) Employee travel related expenses or employee reimbursable expenses are submitted on paper using the FPPA Expense Report or electronically using a cloud based expense report,</p> <p>B) Each report is approved by the employee's manager and FPPA Staff must complete a travel expense report in compliance with the FPPA Travel and Expense policy.</p> | No exceptions noted. |
| 3.14 | FPPA Staff Payroll and Retiree Payroll Journal Entries are reviewed and approved by an Accounting Manager. | 1. Inspected FPPA Staff Payroll and Retiree Payroll Journal Entries for a sample of months to evidence that the FPPA Staff Payroll and Retiree Payroll Journal Entries are reviewed and approved by an Accounting Manager. | No exceptions noted. |
| 3.15 | FPPA management receives Service Organization Control reports from subservice organizations. FPPA management reviews these reports for areas of concern and complementary user entity controls. | 1. Inspected SOC reports and management monitoring documentation to evidence that FPPA management receives Service Organization Control reports from subservice organizations and that FPPA management reviews these reports for areas of concern and complementary user entity controls. | No exceptions noted. |

4. Retirement Plan Income and Expense Allocations

Controls provide reasonable assurance that retirement plan income and expense allocations are processed accurately and completely.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|--|----------------------|
| 4.1 | Monthly allocations of income and expense are calculated based on plans' percentage of assets and membership headcount. The income and expense allocation report is reconciled to the month end trial balance retained earnings. Reconciliations are reviewed and approved by an Accounting Manager. | <p>1. Inspected supporting documentation for a sample of plans and months to evidence that the allocation is based on plans percentage of assets and plan headcount.</p> <p>2. Inspected supporting documentation for a sample of months to evidence that the monthly reconciliation of income and expense allocations to the month end trial balance is reviewed and approved by an Accounting Manager.</p> | No exceptions noted. |
| 4.2 | An Accounting Manager, using the approved reconciled income and expense allocation report (see 4.1), generates a journal entry to record the allocated income and expense. The journal entry is reviewed by a separate Accounting Manager. | <p>1. Inspected supporting documentation for sample of plans and months to evidence that the monthly income and expense allocations are correctly recorded in the monthly allocation journal entry.</p> <p>2. Inspected supporting documentation for a sample of months to evidence the monthly allocation journal entry is reviewed and approved by a separate Accounting Manager.</p> | No exceptions noted. |
| 4.3 | The ending trial balance is reconciled to the income and expense allocation report monthly. The reconciliation is reviewed by a separate Accounting Manager. | 1. Inspected supporting documentation for a sample of months to evidence that the monthly reconciliation of the ending trial balance and the income and expense allocation report is reviewed and approved by a separate Accounting Manager. | No exceptions noted. |
| 4.4 | FPPA management receives Service Organization Control reports from subservice organizations. FPPA management reviews these reports for areas of concern and complementary user entity controls. | 1. Inspected SOC reports and management monitoring documentation to evidence that management receives the SOC reports from subservice organizations annually, and reviews the reports for opinion modification, exceptions and complementary user entity controls to identify any follow up procedures needed. | No exceptions noted. |

5. Participant Record Changes

Controls provide reasonable assurance that changes to retirement participant records are processed accurately and completely, are properly authorized.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|---|----------------------|
| 5.1 | Participant records modified using the FPPA Employer Portal that do not satisfy ASPEN processing rules, are stopped and reviewed by a Contribution or Payroll team member. | <p>1. Observed the ASPEN processing rules to evidence that rules are in place to ensure complete and accurate processing of participant records.</p> <p>2. Observed a plan modification being held for participant modifications that do not satisfy ASPEN processing rules to evidence that Participant records modified using the FPPA Employer Portal that do not satisfy ASPEN processing rules are stopped.</p> <p>3. Inspected supporting documentation for a sample of participant record changes that did not require manual modification to evidence that participant records modified using the FPPA Employer Portal that do not satisfy ASPEN processing rules, are stopped and reviewed by a Contribution or Payroll team member.</p> <p>4. Inspected supporting documentation for a sample of member account changes that were manually entered or modified by a contribution or payroll team member to evidence that participant records modified using the FPPA Employer Portal that do not satisfy ASPEN processing rules, are stopped and reviewed by a Contribution or Payroll team member.</p> | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|--|----------------------|
| 5.2 | All participant record changes that are manually entered or modified by the Contribution or Payroll team members are reviewed and approved prior to final processing. | <p>1. Inspected supporting documentation for a sample of member account changes that were manually entered or modified by a contribution or payroll team member to evidence that they were reviewed and approved prior to final processing.</p> <p>2. Inspected supporting documentation for a sample of payee account changes that were manually entered or modified by a contribution or payroll team member to evidence that they were reviewed and approved prior to final processing.</p> | No exceptions noted. |
| 5.3 | Changes of pension payment amounts require plan authorization prior to changes being made. All changes in pension payment amounts are confirmed with the employer by a Payroll team member after first payroll run after changes. | <p>1. Inspected a sample of changes to pension payment amounts to evidence that changes of pension payment amounts require plan authorization prior to changes being made.</p> <p>2. Inspected a sample of changes to pension payment amounts to evidence that all changes in pension payment amounts are confirmed with the employer by a Payroll team member after next payroll run.</p> | No exception noted. |
| 5.4 | A payroll team member completes the proper Checklist for authorized changes, and changes in ASPEN to pension payments are reviewed by a second Payroll team member. | 1. Inspected a sample of changes to pension payment amounts to evidence that the proper Checklist is completed and reviewed by a second payroll team member. | No exception noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|--|----------------------|
| 5.5 | New retiree pension payments are only setup by a Payroll team member in ASPEN once the completed approved pension form has been received. The benefit setup is confirmed by a separate Payroll team member in ASPEN. | <p>1. Inspected supporting documentation for a sample of new pension payments to evidence that the pension payments are only setup by a Payroll team member in ASPEN once the completed approved pension form has been received.</p> <p>2. Inspected supporting documentation for a sample of new pension payments to evidence that the benefit setup is confirmed by a separate Payroll team member in ASPEN.</p> | No exception noted. |
| 5.6 | Third-Party death notices, provided by Pension Benefit Information (PBI) or Lexis Nexis, vendors, are reviewed by a Payroll team member. Any discrepancies are communicated to the Employer for resolution. | 1. Inspected third party death notices, which are received from Pension Benefit Information (PBI) or Lexis Nexis, for a sample of participant deaths to evidence that death notification form agrees and any differences are resolved. | No exceptions noted. |
| 5.7 | FPPA management receives Service Organization Control reports from subservice organizations. FPPA management reviews these reports for areas of concern and complementary user entity controls. | 1. Inspected SOC reports and management monitoring documentation to evidence that FPPA management receives Service Organization Control reports from subservice organizations and that FPPA management reviews these reports for areas of concern and complementary user entity controls. | No exceptions noted. |

6. Retirement Plan Cash Movements

Controls provide reasonable assurance that retirement plan cash movements are processed accurately, completely, timely, and are properly authorized.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|--|----------------------|
| 6.1 | Third-party investment managers reconcile monthly investment activity to BNY Mellon records. The reconciliations are reviewed and approved by Investment personnel. | 1. Inspected supporting documentation for a sample of months to evidence that FPPA management reviews the third party investment manager's monthly reconciliations to BNY Mellon. | No exceptions noted. |
| 6.2 | Monthly journal entries to record portfolio investment income are reviewed and approved by an Accounting Manager. | 1. Inspected supporting documentation for a sample of months to evidence that monthly journal entries to record portfolio investment income are reviewed and approved by an Accounting Manager. | No exceptions noted. |
| 6.3 | Monthly asset based fee reimbursement wires and non-capital call wires are reviewed and authorized prior to payment by the Chief Investment Officer, Chief Operations Officer, or Executive Director. | 1. Inspected supporting documentation for a sample of months to evidence the monthly asset based fee reimbursement wires are reviewed and authorized prior to payment. 2. Inspected supporting documentation for a non-recurring non-capital call wire to evidence that the wire is reviewed and authorized prior to payment. | No exceptions noted. |
| 6.4 | Investment account activity is reconciled between the BNY Mellon and Microsoft Dynamics GP System by the Investment Accountant and reviewed monthly by an Accounting Manager. | 1. Inspected supporting documentation for a sample of months to evidence that the monthly investment activity reconciliation is performed between BNY Mellon and Microsoft Dynamics GP by the Investment Accountant and reviewed monthly by an Accounting Manager. | No exceptions noted. |
| 6.5 | FPPA management receives Service Organization Control reports from subservice organizations. FPPA management reviews these reports for areas of concern and complementary user entity controls. | 1. Inspected SOC reports and management monitoring documentation to evidence that management receives the SOC reports from subservice organizations annually, and reviews the reports for opinion modification, exceptions and complementary user entity controls to identify any follow up procedures needed. | No exceptions noted. |

7. Annual Review of Participant Records

Controls provide reasonable assurance that plan participant records are transmitted accurately and completely to the actuary.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|--|----------------------|
| 7.1 | Individual plan management is notified by FPPA to review the participant records at least annually. | 1. Inspected the annual memo sent to plan management to evidence that plan management is notified at least annually to review participant records. | No exceptions noted. |
| 7.2 | Participant records modified using the FPPA Employer Portal that do not satisfy ASPEN processing rules, are stopped and reviewed by a Contribution or Payroll team member. | <p>1. Observed the ASPEN processing rules to evidence that rules are in place to ensure complete and accurate processing of participant records.</p> <p>2. Observed a plan modification being held for participant modifications that do not satisfy ASPEN processing rules to evidence that Participant records modified using the FPPA Employer Portal that do not satisfy ASPEN processing rules are stopped.</p> <p>3. Inspected supporting documentation for a sample of participant record changes that did not require manual modification to evidence that participant records modified using the FPPA Employer Portal that do not satisfy ASPEN processing rules, are stopped and reviewed by a Contribution or Payroll team member.</p> <p>4. Inspected supporting documentation for a sample of participant record changes that did require manual modification to evidence that participant records modified using the FPPA Employer Portal that do not satisfy ASPEN processing rules, are stopped and reviewed by a Contribution or Payroll team member.</p> | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|--|----------------------|
| 7.3 | All participant record changes that are manually entered or modified by the Contribution or Payroll team members are reviewed and approved prior to final processing. | <p>1. Inspected supporting documentation for a sample of member account changes that were manually entered or modified by a contribution or payroll team member to evidence that they were reviewed and approved prior to final processing.</p> <p>2. Inspected supporting documentation for a sample of payee account changes that were manually entered or modified by a contribution or payroll team member to evidence that they were reviewed and approved prior to final processing.</p> | No exceptions noted. |
| 7.4 | Annually, the compiled census data for Old Hire and Volunteer Plans is reviewed for significant or unusual variances from the prior year, which are documented for consideration during actuarial processing. | 1. Inspected the population of compiled census data spreadsheets for Old Hire and Volunteer plans to evidence that the data is reviewed for significant or unusual variances. | No exceptions noted. |
| 7.5 | FPPA management reviews and monitors the actuarial subservice organization. | 1. Inspected supporting documentation to evidence that management monitors the actuarial subservice organization. | No exceptions noted. |

8. Logical Access Controls

Controls provide reasonable assurance that logical access to programs, data, and computer resources is restricted to authorized and appropriate individuals and appropriately documented.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|--|----------------------|
| 8.1 | <p>Access to the network, ASPEN, and Microsoft Dynamics GP System applications are restricted via the following password and account lockout settings:</p> <ul style="list-style-type: none"> • 14 character minimum. • Complexity enabled requiring upper and lower case, number, or special characters • Account locked after 5 invalid attempts • Password change interval of 90 days (annually for service accounts) • Contractor or temporary employee force password expiration every 90 days or to the term of statement of work, whichever is more restrictive | <p>1. Inspected evidence that ASPEN, Microsoft Dynamics GP and the FPPA Network (including service accounts and contractor or temporary employees) password policies and lockout settings met the FPPA IT password policy.</p> | No exceptions noted. |
| 8.2 | <p>Network administrative access to FPPA systems is restricted to FPPA IT staff. The list of network administrators is reviewed and approved annually by the IT Director.</p> | <p>1. Inspected evidence that Network administrative access to FPPA systems is restricted to FPPA IT staff and that it is reviewed annually.</p> | No exceptions noted. |
| 8.3 | <p>Administrative functions within ASPEN, FPPA's pension administration system, including the ability to create user access based on roles, is limited to the Chief Operations Officer, IT Director, and the internal IT development staff. Administrative access to ASPEN is reviewed at least annually as part of the User Access Administration.</p> | <p>1. Inspected evidence that ASPEN administrative functions including the ability to create user access based on roles, is limited to the Chief Operations Officer, IT Director, and the internal IT development staff and that access permissions are reviewed annually.</p> <p>2. Inspected a sample of new users to evidence that Arctic Wolf notified the IT Director that a new user had been added to Active Directory.</p> | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|--|----------------------|
| 8.4 | Administrative functions within Microsoft Dynamics GP, FPPA's Microsoft Dynamics GP system, including the ability to create users and assign access based on roles, is limited to the Chief Operations Officer and IT staff. Administrative access to Microsoft Dynamics GP is reviewed at least annually as part of the User Access Administration. | 1. Inspected evidence that Administrative functions within Microsoft Dynamics GP, FPPA's Microsoft Dynamics GP system, including the ability to create users and assign access based on roles, is limited to the Chief Operations Officer and IT staff and that it is reviewed annually. | No exceptions noted. |
| 8.5 | Administrative functions within the FPPA staff payroll system, including the ability to create users and assign user access based on roles, is limited to the HR Manager and backup. Administrative access to the FPPA staff payroll system is reviewed at least annually as part of the User Access Administration. | 1. Inspected evidence that administrative functions, including the ability to create users and assign user access based on roles in the payroll system is limited to the HR Manager and backup. 2. Inspected evidence that FPPA staff payroll system is reviewed at least annually as part of the User Access Administration. | No exceptions noted. |
| 8.6 | Administrative functions within banking systems, including the ability to set up, modify, or remove user accounts and access based on roles is limited to specific approved users. Administrative access to the banking systems is reviewed at least annually as part of the User Access Administration. | 1. Inspected evidence that administrative functions in the Wells Fargo Bank system is limited to the Chief Operating Officer and IT Director and that it is reviewed annually. 2. Inspected evidence that administrative functions in the BNY Mellon Bank system is limited to the Chief Operating Officer, Executive Director and Chief Investment Officer and that it is reviewed annually. | No exceptions noted. |
| 8.7 | New system access or access modification requests are initiated via a request from a user's manager, which includes the user's name and access rights requested, which may be in the form of a request to mirror an existing user's access. | 1. Inspected a sample of new users to evidence that access granted to new users had been approved by the appropriate manager. 2. Inspected documentation of user access and processing role reviews during the period to evidence that it is reviewed and approved by the user's manager. | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|--|--|----------------------|
| 8.8 | The human resources department will notify the IT department of all terminations. The IT department will inactivate and remove terminated user's access to FPPA's IT system following the termination procedure, then notify the Chief Operations Officer to direct the removal of the terminated user's access to banking systems, if needed. | 1. Inspected service tickets for a sample of terminated employees for evidence that HR notified IT of their termination date and that their access was removed from IT systems and banking systems if applicable. | No exceptions noted. |
| 8.9 | User access and the processing roles within FPPA's systems is initiated and managed by IT staff. It is then reviewed at least annually and approved by the user's manager. | 1. Inspected documentation of user access and processing role reviews during the period to evidence that the review was completed and approved. | No exceptions noted. |
| 8.10 | Access to the production databases supporting ASPEN and Microsoft Dynamics GP System is restricted to IT staff. | 1. Inspected user access to the production databases for ASPEN and Microsoft Dynamics GP and reviewed their access with the IT Director to determine whether appropriate. | No exceptions noted. |
| 8.11 | Security monitoring is performed over the FPPA network by a third party (Arctic Wolf). Issues are documented and tracked to remediation. | 1. Inspected evidence that monitoring over FPPA's network is performed by Arctic Wolf and that issues are documented and tracked to remediation. | No exceptions noted. |
| 8.12 | FPPA management receives SOC reports from subservice organizations. They review the reports for areas of concern and complementary user entity controls. | 1. Inspected SOC reports and management monitoring documentation to evidence that management receives the SOC reports from subservice organizations annually, and reviews the reports for opinion modification, exceptions and complementary user entity controls to identify any follow up procedures needed. | No exceptions noted. |

9. Configuration Management

Controls provide reasonable assurance that application changes to Pension System & General Ledger System are appropriately documented, tested, and approved.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|---|----------------------|
| 9.1 | ASPEN users enter problem incident reports (PIRs) into SCOUT to notify IT staff of issues or enhancements. These PIRs are reviewed, evaluated, prioritized and approved for processing by the Chief Operations Officer, IT Director, or Applications Manager. | <ol style="list-style-type: none"> 1 Inspected the SCOUT system as evidence that ASPEN users can enter system issues or enhancements. 2. Inspected evidence that Problem Incident Reports (PIRs) are created in SCOUT which are then handled by IT. 3. Inspected evidence that Problem Incident Reports (PIRs) are reviewed, evaluated, prioritized and approved for processing by the COO, IT Director, or Application Manager. | No exceptions noted. |
| 9.2 | When development changes to ASPEN are in progress, all members of the ASPEN development team are able to see the coding changes as highlighted differences and review them through code reviews to understand the changes and vet the coding for accuracy. | <ol style="list-style-type: none"> 1. Inspected evidence within Team Foundation Services (TFS) that ASPEN development team members are able to see the coding changes. 2. Inspected evidence that TFS tracks changes made to the code by highlighting difference and that the changes can then be checked for accuracy. | No exceptions noted. |
| 9.3 | ASPEN development changes are tested and approved by the users in a test environment. Once approved by the users, the changes are added to the production build. | <ol style="list-style-type: none"> 1. Inspected change documentation for a sample of ASPEN development changes to determine whether changes were tested and approved. 2. Observed that the organization maintains separate test environments for ASPEN. | No exceptions noted. |
| 9.4 | Once the production build document is approved by the Chief Operations Officer or IT Director, a final ASPEN build is performed and deployed by either of the two IT development staff and not by any external contractors. | <ol style="list-style-type: none"> 1. Inspected a sample of builds as evidence that the production build document was approved by the COO or IT Director prior to being added to production. 2. Inspected a sample of builds as evidence that ASPEN builds are added into production by either of the two authorized IT development staff and not by an external contractor. | No exceptions noted. |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|---|----------------------|
| 9.5 | Microsoft Dynamics GP system application changes implemented in production are restricted to IT staff members. | 1. Inspected evidence that Microsoft Dynamics GP system application changes implemented in production are restricted to IT staff members. | No exceptions noted. |
| 9.6 | Microsoft Dynamics GP System changes are tested and approved by the Accounting Manager or Accounting Director. Once approved, the changes are implemented by IT staff. | 1. Inspected change documentation for a Microsoft Dynamics GP System change to evidence that Microsoft Dynamics GP System changes are tested and approved by the Accounting Manager or Accounting Director. Once approved, the changes are implemented by IT staff. | No exceptions noted. |
| 9.7 | Patch deployment is managed through an enterprise wide patch management system. Vulnerabilities from missing patches are reported on a monthly cycle from a vulnerability scanner to a vulnerability management system that prioritizes patching and remediation efforts. | 1. Inspected patch deployment console showing all critical and non-critical updates. | No Exceptions noted |
| 9.8 | Independent third-party security assessment and penetration testing is performed annually. Deficiencies and recommendations resulting from the assessment are presented to the FPPA Audit Committee and are tracked by the IT Director for remediation. | 1. Inspected evidence that an external security assessment and penetration test was performed. 2. Inspected evidence that findings are currently being drafted and have not yet been presented to the FPPA Audit Committee. 3. Inspected evidence that findings and recommendations were being tracked and addressed. | No exceptions noted. |
| 9.9 | FPPA management receives Service Organization Control reports from subservice organizations. FPPA management reviews these reports for areas of concern and complementary user entity controls. | 1. Inspected SOC reports and management monitoring documentation to evidence that management receives the SOC reports from subservice organizations annually, and reviews the reports for opinion modification, exceptions and complementary user entity controls to identify any follow up procedures needed. | No exceptions noted. |

10. Service Continuity

Controls provide reasonable assurance that Pension System & General Ledger program data is regularly and completely backed up.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|-------------------------------------|---|--|----------------------|
| 10.1 | ASPEN and Microsoft Dynamics GP System production data and applications are backed up daily on-site and replicated daily off-site. Additional off-line backups are rotated to an offsite storage facility weekly. | <p>1. Inspected backup logs and configuration settings to evidence that backups of ASPEN and Microsoft Dynamics GP system data files are backed up onsite every two hours.</p> <p>2. Inspected backup logs and configuration settings to evidence that backups of ASPEN and Microsoft Dynamics GP system data files are backed up daily offsite.</p> | No exceptions noted. |
| 10.2 | FPPA backups are tested at least annually to confirm that they are working and that systems can be recovered. | 1. Inspected evidence that backups are tested annually. | No exceptions noted. |
| 10.3 | FPPA swaps out(un-plugs) the removable backup media at an offsite secure storage location on a weekly basis. | 1. Inspected evidence that FPPA replicates the removable backups on a weekly basis. | No exceptions noted. |

11. Physical Access Controls

Controls provide reasonable assurance that physical access to FPPA offices and sensitive areas is restricted to authorized and appropriate individuals.

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|-------------------------------------|---|--|---|
| 11.1 | The FPPA office space has controlled access via key cards and server room has cypher locks that restrict unauthorized physical access. The server room employs environmental monitoring for heat, smoke, water and door movement. A camera is also employed to track movement within the server room. The server room power is backed up by battery backup and generator. | <p>1. Observed via Zoom™ that all the FPPA office entry points are controlled via key cards.</p> <p>2. Observed via Zoom™ that the FPPA server room is restricted via cypher locks and attempted to gain access without the code.</p> <p>3. Observed via Zoom™ that the FPPA server room environmental controls, battery and generator are all in working order and that a camera is also employed to track movement within the server room.</p> | No exceptions noted. |
| 11.2 | The FPPA office has staff at front desk during normal office hours and monitors all visitors. | 1. Observed how visitor access was controlled to the FPPA office during normal business hours. | No exceptions noted. |
| 11.3 | Access to the FPPA office is only granted with approval of an FPPA staff member. | 1. Observed how visitor access was controlled to the FPPA office during normal business hours and only after approval. | No exceptions noted. |
| 11.4 | Access to the FPPA server room is only granted to FPPA IT staff. | <p>1. Observed via Zoom™ server room access is restricted to IT staff by attempting to access without cypher code.</p> <p>2. Observed via Zoom™ the server room login sheet to evidence that all individuals that had entered were IT staff.</p> <p>3. Inspected evidence and noted that an employee with server room access had resigned which required the cypher key to be changed.</p> | <p>No exceptions noted.</p> <p>No exceptions noted.</p> <p>No exceptions noted.</p> |

| Controls Specified by Management | | Testing Performed by Eide Bailly LLP | Results of Testing |
|----------------------------------|---|--|----------------------|
| 11.5 | Access to the FPPA server room for vendors, contractors or other unauthorized staff must be accompanied by an IT staff member. | <p>1. Observed the log sheet to verify it is signed by an IT staff member.</p> <p>2. Observed an employee, via Zoom™, perform a walkthrough of the server room to evidence that access is restricted to IT staff by attempting to access the server room without a cypher code.</p> | No exceptions noted. |
| 11.6 | FPPA management receives Service Organization Control reports from subservice organizations. FPPA management reviews these reports for areas of concern and complementary user entity controls. | 1. Inspected SOC reports and management monitoring documentation to evidence that management receives the SOC reports from subservice organizations annually, and reviews the reports for opinion modification, exceptions and complementary user entity controls to identify any follow up procedures needed. | No exceptions noted. |