

December 6, 2023

Board of Trustees Kentucky Public Pensions Authority Perimeter Park West 1260 Louisville Road Frankfort, KY 40601

### Re: GASB No. 74 Reporting – Actuarial Information

Dear Members of the Board:

The reports provided herein contain certain information for the County Employees Retirement System (CERS) non-hazardous insurance plan and hazardous insurance plan; the Kentucky Employees Retirement System (KERS) non-hazardous insurance plan and hazardous insurance plan; and the State Police Retirement System (SPRS) insurance plan in connection with the Governmental Accounting Standards Board (GASB) Statement No. 74, "Financial Reporting for Postemployment Benefit Plans Other than Pension Plans" for the fiscal year ending June 30, 2023. Separate reports will be provided at a later date with additional accounting information determined in accordance with GASB Statement No. 75, "Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions".

#### **Basis of Calculations**

The liability calculations presented in the reports were performed for the purpose of satisfying the requirements of GASB No. 74 and are not applicable for other purposes, such as determining the plan's funding requirements. The plan's liability for other purposes may produce significantly different results.

The total OPEB liability, net OPEB liability, and sensitivity information are based on an actuarial valuation date of June 30, 2022. The total OPEB liability was rolled-forward from the valuation date to the plan's fiscal year ending June 30, 2023 using generally accepted actuarial principles.

#### Assumptions

The County Employees Retirement System Board of Trustees and the Kentucky Retirement Systems Board of Trustees adopted new actuarial assumptions on May 9, 2023 and June 5, 2023, respectively. These assumptions are documented in the reports titled "2022 Actuarial Experience Study for the Period Ending June 30, 2022". Additionally, the discount rates used to calculate the total OPEB liability increased for each fund since the prior year (see further discussion on the calculation of the single discount rates later in this letter). The Total OPEB Liability as of June 30, 2023 is determined using these updated assumptions.

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### Plan Provisions

House Bill 506 passed during the 2023 legislative session and adjusted the minimum required separation period before a retiree may become reemployed to be one month for all circumstances for each plan. This is a minimal change for members in the KERS hazardous, CERS hazardous, and SPRS plans, as the minimum separation period is currently one month for members who become reemployed on a full-time basis in a hazardous position. The requirement was previously three months only for members who become reemployed on a part-time basis or in any non-hazardous position. We believe this provision of House Bill 506 will have an insignificant impact on the retirement pattern of hazardous members and therefore have reflected no fiscal impact to the total OPEB liability of the KERS hazardous, CERS hazardous, or SPRS plans.

Similarly, this is a relatively small change for future retirees in the KERS and CERS non-hazardous plans. But as the minimum separation period was previously three months in almost every circumstance, we have assumed that there would be a 1.0% increase in the rate of retirement for each of the first two years a non-hazardous member becomes retirement eligible under the age of 65, in order to reflect a shift in the retirement pattern. The total OPEB liability as of June 30, 2023 for the KERS non-hazardous and CERS non-hazardous plans is determined using these updated benefit provisions.

There were no other plan provision changes that would materially impact the total OPEB liability since June 30, 2022. It is our opinion that these procedures for determining the information contained in these reports are reasonable and appropriate, and comply with applicable requirements under GASB No. 74.

# Implicit Employer Subsidy for Non-Medicare Retirees

The fully-insured premiums paid for the Kentucky Employees' Health Plan are blended rates based on the combined experience of active and retired members. Because the average cost of providing health care benefits to retirees under age 65 is higher than the average cost of providing health care benefits to active employees, there is an implicit employer subsidy for the non-Medicare eligible retirees. GASB No. 74 requires that the liability associated with this implicit subsidy be included in the calculation of the Total OPEB Liability.

#### Single Discount Rate

The following single discount rates were used to measure the total OPEB liability for the fiscal year ending June 30, 2023.

KERS Non-Hazardous	5.94%
KERS Hazardous	5.94%
CERS Non-Hazardous	5.93%
CERS Hazardous	5.97%
SPRS	6.02%



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The single discount rates are based on the expected rate of return on OPEB plan investments of 6.50% and a municipal bond rate of 3.86%, as reported in Fidelity Index's "20-Year Municipal GO AA Index" as of June 30, 2023. Based on the stated assumptions and the projection of cash flows as of each fiscal year ending, the plan's fiduciary net position and future contributions were projected to be sufficient to finance the future benefit payments of the current plan members. Therefore, the long-term expected rate of return on insurance plan investments was applied to all periods of the projected benefit payments paid from the retirement system. However, the cost associated with the implicit employer subsidy is not currently being included in the calculation of the plan's actuarial determined contributions, and it is our understanding that any cost associated with the implicit subsidy will not be paid out of the plan's trust. Therefore, the implicit subsidy.

The projection of cash flows used to determine the single discount rate must include an assumption regarding actual employer contributions made each future year. Future contributions are projected assuming that the entire actuarially determined employer contribution is received by each plan each future year, calculated in accordance with the current funding policy.

# 401(h) Subaccount

Based on guidance issued by GASB in connection with GASB Statement No. 74, the 1% of pay member contributions for Tier 2 and Tier 3 members to a 401(h) subaccount is considered an OPEB asset. As a result, the reported fiduciary net position includes these 401(h) assets. Additionally, these member contributions and associated investment income and administrative expenses are included in the reconciliation of the fiduciary net position.

# Additional Disclosures

This information is based upon information, furnished to us by the Kentucky Public Pensions Authority (KPPA), which includes benefit provisions, membership information, and financial data. We did not audit this data and information, but we did apply a number of tests and concluded that it was reasonable and consistent. GRS is not responsible for the accuracy or completeness of the information provided by KPPA. Please see the "Actuarial Valuation Report as of June 30, 2022" for each system and the reports titled "2022 Actuarial Experience Study for the Period Ending June 30, 2022" for additional discussion of the nature of the actuarial calculations and more information related to participant data, economic and demographic assumptions, and benefit provisions. These reports should be considered together as a complete report for fiscal year ending June 30, 2023.



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To the best of our knowledge, this report is complete and accurate and is in accordance with generally recognized actuarial practices and methods. Mr. White and Ms. Shaw are Enrolled Actuaries. All of the undersigned are members of the American Academy of Actuaries and meet all of the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion herein. In addition, all three are independent of KPPA and are experienced in performing valuations for large public retirement systems. This communication shall not be construed to provide tax advice, legal advice or investment advice.

Sincerely,

# **Gabriel Roeder Smith & Company**

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