

September 7, 2018

VIA EMAIL

Ms. Shelly Baumann, Plan Administrator
City of Venice
14 Kelly Drive
Arcadia, FL 34266

Re: City of Venice
Municipal Firefighters' Pension Trust Fund

Dear Shelly:

In response to Scott Christiansen's letter dated August 13, 2018, we have reviewed the proposed Ordinance (identified on page 5 as dm/ven/fire/08-13-18.ord) including, but not limited to, the following proposed changes:

1. Section 50-88, Disability, is being amended to more clearly identify those individuals who may be eligible to apply for a disability pension in the event that they have resigned or their employment is terminated. This clarification does not change the way in which this provision has been applied or interpreted in the past. This change is being made because the current language has been challenged in litigation as being unclear and has resulted in unintended application of the language. The recommended change clarifies the language with no change in the intended application.
2. Section 50-97, Miscellaneous Provisions, is being amended to add subsection (j), Missing Benefit Recipients. This provision is in accordance with a recent IRS Programs Compliance Memorandum that requires plans to have an approved method for locating terminated individuals who are due benefits from the plan.

A proposed amendment to the Operating Rules and Procedures, outlining the specifics of this procedure has already been adopted by the Board.

3. Section 50-108, Reemployment After Retirement, is being amended to make several changes as required by the Internal Revenue Code to satisfy the qualification requirements applicable to the reemployment of a disability retiree as well as changes necessary to reflect that the plan is closed to new members.

We have determined that adoption of this resolution will have no impact on the assumptions used in determining the funding requirements of the program. Because the changes do not result in a change in the valuation results, it is our opinion that a formal Actuarial Impact Statement is not required in support of its adoption. However, since the Division of Retirement must be aware of the current provisions of all public pension programs, it is recommended that you send a copy of this letter and a copy of the fully executed resolution to each of the following offices:

Mr. Keith Brinkman
Division of Retirement
Bureau of Local Retirement Systems
P. O. Box 9000
Tallahassee, FL 32315-3010

Mr. Steve Bardin
Division of Retirement
Municipal Police and Fire
Pension Trust Funds
P.O. Box 3010
Tallahassee, FL 32315-3010

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The undersigned is familiar with the immediate and long-term aspects of pension valuations, and meets the Qualification Standards of the American Academy of Actuaries necessary to render the actuarial opinions contained herein.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Douglas H. Lozen".

Douglas H. Lozen, EA, MAAA

cc via email: Scott Christiansen, Plan Attorney