FRESNO COUNTY EMPLOYEES' RETIREMENT ASSOCIATION
FCERA

7772 N. Palm Ave.
Fresno, CA 93711
www.fcera.org
(559) 457-0681 p.
(559) 457-0318 f.

DATE: December 5, 2018

TO: Board of Retirement

FROM: Donald C. Kendig, CPA,
Retirement Administrator

Staff Contact: Doris L. Rentschler, CFP
Assistant Retirement Administrator

SUBJECT: **Approval of PEPRA Compensation Limits for 2019 – RECEIVE AND FILE**

Recommended Actions

1. Adopt the compensation limits for Calendar year 2019 as follows:
   - $124,180 for members that participate in the Federal Social Security System; and,
   - $149,016 for members that do NOT participate in the Federal Social Security System.

Fiscal and Financial Impacts

There is no immediate direct financial impact to the system by receiving this report. Adjusting the limit up will increase the amount of pension contributions paid into the Association by sponsors and active employees relating to pensionable compensation for PEPRA (Tier V) members to the extent wages increased over last year's limits of $121,388 and $145,666. Higher pensionable compensation will ultimately increase benefits paid by the Association when those members retire.

Background and Discussion

Per Government Code Section 7622.10, the Association shall annually adjust the pensionable compensation limit. The calculation of the limit is defined by Government Code Section 7622.10 and is described in the attached letter prepared by the California Actuarial Advisory Panel (CAAP). The PEPRA Compensation Limit as calculated by the CAAP is advisory in nature and FCERA staff and its actuary, The Segal Company, have reviewed the calculation and agree that it is prepared in compliance with the law. The California Public Employees' Pension Reform Act of 2013 (PEPRA), as amended by Senate Bill No. 13 (SB 13), limits compensation that can be used to calculate a retirement benefit and pension contributions for members subject to PEPRA.

Attachments

1. CAAP PEPRA Compensation Limit for 2019 letter dated November 16, 2018

California Actuarial Advisory Panel

November 16, 2018

SUBJECT: PEPRA Compensation Limit for 2019 (Code Section 7522.10)

To Whom It May Concern:

Pursuant to a request from a Public Agency, the California Actuarial Advisory Panel (the Panel) is publishing this letter to provide a calculation of the Pension Compensation Limits for the Calendar Year 2019.

Background

Pursuant to Government Code section 7507.2(b), the responsibilities of the Panel include "Replying to policy questions from public retirement systems in California" and "Providing comment upon request by public agencies." In 2013, members of the Panel received a request from a public retirement system (the San Joaquin County Employees' Retirement Association) to compute and publish the annual compensation limit prescribed by the California Public Employees' Pension Reform Act of 2013 (PEPRA), as amended by Senate Bill No. 13 (SB 13). This request was made to address a concern that minor calculation or rounding differences could result in different systems calculating slightly different pension compensation limits.

The Panel agreed to calculate the dollar amounts of the pension compensation limits for 2014 and future years, as we believe that the use of a uniform compensation limit will provide administrative benefits to California's public retirement systems. However, as the Panel is an advisory body only (Government Code section 7507.2(e) states that "The opinions of the California Actuarial Advisory Panel are nonbinding and advisory only"), the Panel encourages each system to independently review the calculation of the pension compensation limits contained in this letter.

State Controller's Office
California Actuarial Advisory Panel
c/o State Accounting and Reporting Division
P.O. Box 942850, Sacramento, CA 94250
Phone: 916-322-3702 Fax: 916-323-4807

Analysis

Section 7522.10 of the Government Code is as follows:

7522.10. (a) On and after January 1, 2013, each public retirement system shall modify its plan or plans to comply with the requirements of this section for each public employer that participates in the system.
(b) Whenever pensionable compensation, as defined in Section 7522.34, is used in the calculation of a benefit, the pensionable compensation shall be subject to the limitations set forth in subdivision (c).
(c) The pensionable compensation used to calculate the defined benefit paid to a new member who retires from the system shall not exceed the following applicable percentage of the contribution and benefit base specified in Section 430(b) of Title 42 of the United States Code on January 1, 2013:
(1) One hundred percent for a member whose service is included in the federal system.
(2) One hundred twenty percent for a member whose service is not included in the federal system.
(d) (1) The retirement system shall adjust the pensionable compensation described in subdivision (c) based on the annual changes to the Consumer Price Index for All Urban Consumers: U.S. City Average, calculated by dividing the Consumer Price Index for All Urban Consumers: U.S. City Average, for the month of September in the calendar year preceding the adjustment by the Consumer Price Index for All Urban Consumers: U.S. City Average, for the month of September of the previous year rounded to the nearest thousandth. The adjustment shall be effective annually on January 1, beginning in 2014.

The annual compensation pensionable compensation limit computed by the Panel for 2018 was $121,388 for those included in the federal Social Security system and $145,666 for those not included.

The Consumer Price Indices for All Urban Consumers (CPI-U) U.S. City Average for the months of September 2017 and 2018 are as follows[1]:

- September, 2018: 252.439
- September, 2017: 246.819

The annual change, computed by dividing the 2018 Index by the 2017 Index, rounded to the nearest thousandth is as follows:

- 252.439 ÷ 246.819 = 1.023

[1] http://data.bls.gov/timeseries/CUUR0000SA0

Applying this annual adjustment to the 2018 limits yields the following limits for calendar year 2019:

- \$121,388 x 1.023 = \$124,180 (included in federal system)
- \$145,666 x 1.023 = \$149,016 (not included in federal system)

The indexation of the maximum compensation to be used by CalSTRS using the February CPI-U, based on AB 1381 passed by the legislature in 2013, is not addressed in this letter.

Conclusion

The calculations described above indicate the compensation limit for PEPRA members for Calendar Year 2019 will increase to \$124,180 for members participating in the federal system (7522.10(c)(1) limit) and \$149,016 for members not participating in the federal system (7522.10(c)(2) limit). The Panel intends to provide similar calculations in future years. The contents of this letter are nonbinding and advisory only, and we encourage each public retirement system to independently evaluate these calculations.

Sincerely,

Paul Angelo
Chair, California Actuarial Advisory Panel

cc: Panel members
John Bartel, Vice Chair
Ian Altman
David Driscoll
David Lamoureux
Steve Ohanian
Graham Schmidt
Scott Terando