# Formulating a Funding Policy

Innovative Public Pension Funding Strategy Contest Winner - Risk Based Funding Policy

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# Why do we need a Funding Policy?



### To provide benefit security

- Proactive/Intentional plan to make sure there all promised benefits are paid
- Prefunding lowers the amount of plan sponsor contributions needed
- All parties are aware of when and how benefits will be paid for

### The Texas Pension Review Board requires it

 TLFFRA plans have historically been passively funded through fixed contribution rates

# **Texas PRB Funding Policy Components**

Clear and concrete funding objectives

### Actuarial methods

- Actuarial Cost method
- Asset Smoothing method
- Amortization Policy

# A roadmap to achieve funding objectives

- Contribution rate calculation
- Benefit/Contribution Changes

Actions that will be taken to address actual experience that diverges from assumptions

- Risk Sharing
- Contributions
- Benefits



# So What is the Goal?

# PRB recommends 100% funded ratio in 10-25 years



# What Are We Funding?

### **Prior Costs**

- Experience Losses
- Assumption Changes
- Benefit Improvements
- Underfunding

### **Annual Costs**

- Service Cost
- Administration Expenses
- Investment Expenses



# **Prior Costs**



# **Prior Costs**



# Should be eliminated in a reasonable period

- PRB recommends 10-25 years, that may not be reasonable
- Could use different periods for different causes
  - Assets
  - Liability Experience
  - Assumptions
  - Plan Amendments

### Amortization structures may vary

- Level percent of pay each year
  - May make sense from a budgeting standpoint
  - Could have negative amortization in early years
- Level dollar each year
- Payments could be layered
  - Helps smooth contribution volatility
- Cash infusion (pension obligation bond)

# **Annual Costs**



### **Service Cost**

Cost of current active members accruing a year of service

Shared with the employee

### **Administrative Costs**

Cost of running the plan

Generally added to Service Cost

Based on an assumption (historical averages, percent of assets, etc.) or on actual budgeted expense

### **Investment Costs**

Cost associated with investing plan assets

Accounted for by reducing asset return assumption

# **Standard Funding Policy Example**

Cost Method	Asset Method	Amortization Method	Risk Sharing	
<ul> <li>Entry age normal, level percent of pay</li> <li>Entry age normal, level dollar if not pay- related</li> </ul>	<ul> <li>Market Value of Assets</li> <li>Smoothed Value of Assets</li> </ul>	<ul> <li>Specify number of years</li> <li>Closed</li> <li>Open</li> <li>Layered</li> <li>Level dollar</li> <li>Level percent of pay</li> </ul>	<ul> <li>Contribution triggers</li> <li>Benefit changes</li> <li>Corridors</li> </ul>	

Actuarially Determined Contribution

# Innovative Public Pension Funding Strategy Contest Winner - Risk Based Funding Policy

# **Contest Overview**

The National Institute on Retirement Security (NIRS) and the Conference of Consulting Actuaries (CCA) held a competition in January 2022.

Aimed at encouraging and sharing innovative thinking around the funding of state and local pension plans.

Focus on innovative ideas on funding policies that can reduce cost volatility, promote intergenerational equity, and assure plans remain on a strong fiscal path over time.

Entrants provided a hypothetical pension scenario and asked to design a funding policy that will address the goals above over the long-term.

Adhere to the recommendations of the 2014 CCA White Paper on Public Plan Funding Policies.

Milliman Team policy chosen as one of the winners.



# **Key Risk Based Funding Policy Components**

### **Risk Adjustment**

- Key aspects of some plans may be inherently more volatile than others
- Risk adjustment allows for cushion to absorb adverse volatility

### **Contribution Surplus Account**

- Allows for flexibility in plan sponsor contributions
- Encourages contribution stability



# **Risk-Based Funding Policy**

Overview

Cost Method	Asset Method	Amortization Method	Risk Adjustment	Contribution Surplus Account (CSA)
<ul> <li>Entry age normal, level percent of pay (level dollar if not pay-related)</li> </ul>	<ul> <li>Market Value of Assets</li> <li>Asset smoothing, max 5 years with a 20% corridor</li> <li>If smoothing applied, reduces the maximum amortization period</li> </ul>	<ul> <li>Layered</li> <li>Level percent of pay (level dollar if not pay-related <u>or</u> accruals frozen)</li> <li>Max 15 years of deferrals, reduced for asset smoothing</li> </ul>	<ul> <li>Risk matrix yields a risk load factor of at least 100%</li> <li>Funding Policy Liability (FPL) = Accrued Liability x Risk Load Factor</li> <li>ADC = Normal Cost + Layered Amortization of unfunded FPL</li> </ul>	<ul> <li>Contributions greater than ADC can be allocated to the CSA</li> <li>CSA adjusted by actual investment return annually</li> <li>Apply towards future benefit improvements or reduce ADC</li> </ul>

# **Risk Matrix Example**

Investment Risk

DESCRIPTION OF RISK	ANALYSIS		<b>RISK FACTOR</b>
Portfolio Volatility	Measured by the standard deviation of the expected return:		
		Risk Factor	Standard deviation = 11
	< 4	-3	
	4-6	-2	
	6-8	-1	
	8-10	0	
	10-12	1	1
	12-14	2	
	> 14	3	
Portfolio Liquidity	Measured by portion of the portfolio in illiquid or difficult to sell assets:		
		Risk Factor	Illiquid assets < 10%
	< 10%	0	
	10-20%	1	
	20-30%	2	0
	> 30%	3	
Well-defined investment policy	Robust investment policy	0	Robust Policy
wen-denned investment policy	Missing key elements	1+	0



Plan Design Risk

- Most flexibility in this component
- Significant opportunities for risk adjustment

DESCRIPTION OF RISK	ANALYSIS		<b>RISK FACTOR</b>
	Assess benefit risk:		
Benefit Accrual		Risk Factor	
	Frozen accruals	-1	3-year Final Average Formula
	Career average	-1	
	Final average (4 years or more)	0	
	Final average (less than 4 years)	1	1
	Overtime, vacation, sick payout included	2	
Optional Forms	Assess potential for adverse selection or "run on the bank":		
		Risk Factor	Traditional Annuities
	Traditional annuities, actuarial equivalent forms	0	only
	Subsidized optional forms (like free J&S)	1	
	Level Income Option	1	0
	Lump sums (other than return of contributions)	2	
Early Retirement	Actuarial equivalence	0	4
	Subsidized factors/unreduced early	1+	

### Plan Design Risk (continued)

- Most flexibility in this component
- Significant opportunities for risk adjustment

DESCRIPTION OF RISK	ANALYSIS		<b>RISK FACTOR</b>
Disability	none or requires Social Security disability	0	0
	Plan determines eligibility or highly subsidized benefit	1+	0
	Sum the following, based on design:	Risk Factor	
	none	0	
COLA	fixed rate < 2%	1	Fixed COLA of 1.5%
	fixed rate > 2%	2	
	linked to CPI	3	
	Annual minimum rate	1	1
	Annual maximum rate	-0.5	
	Lifetime maximum increase	-0.5	
	Delayed start	-0.5	
DROP	If the plan offers DROP, add 1+ based on design		
Other	Determined by the actuary		



### Plan Sponsor Risk and Total Risk Factor

DESCRIPTION OF RISK	ANALYSIS		<b>RISK FACTOR</b>
10-year average % ADC contributed	95%+	0	0
	< 95%	1+	0
Fiduciary risk	Follows good fiduciary practice Missing key elements (such as annual valuations, completing an experience study every five years, using a reasonable investment return assumption)	0 1+	0
		Total Risk Factor	4

### Plan Sponsor Risk and Total Risk Factor

	Total Risk Factor	Risk Load Factor
	< 1	0%
<ul> <li>Sum all risk components (1 + 3 + 0) = 4</li> </ul>	1 - 2	5%
<ul> <li>Identify the Risk Load Factor based on the Total Risk Factor = 10%</li> </ul>	3 - 4	10%
Funding Policy Liability = 110% x Accrued Liability	5	15%
	6	20%
	7	25%
	8	30%
	9	35%
	10+	40%



# **Pros/Cons**

Plan Sponsor Risk and Total Risk Factor

### PROS

- Quantifies a process that many actuaries historically do subjectively
- Built in margin for adverse experience
- Helps to communicate risk to the board/stakeholders
- Provides a structure for discussing plan changes/improvements
- Possible compromise when there is disagreement on key assumptions (such as discount rate)
- Disciplined approach for sponsors who desire/need a conservative funding policy
- CSA allows for funding flexibility

## CONS

- Could be politically difficult to implement
- Concerns about increased burden on current contribution payers
- Possible issues with having a funding target something other than 100% of AAL
- Some projection scenarios result in substantial surplus (when measured against AAL)
- Different measures for GASB and other reporting
- Fiduciary (Agency) risk category(ies) can be a challenge to communicate

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# **Applications (short of full implementation)**

Educational exercise during assumption setting or plan design processes
 Measuring stick for benefit improvements
 Risk adjusted target could be used as a metric in funding projections
 Secondary funding policy for making ad hoc additional contributions
 Normalization tool for comparing different pension plans/systems







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# Thank you!

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