

Vermont State Teachers' Retirement System

**Governmental Accounting Standards Board
Statement 67 Actuarial Valuation Report as of
June 30, 2023**





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November 28, 2023

Board of Trustees
Vermont State Teachers' Retirement System
Montpelier, Vermont 05609

Dear Board Members:

We are pleased to submit this Governmental Accounting Standards Board (GASB) Statement No. 67 Accounting Valuation as of June 30, 2023, for the Vermont State Teachers' Retirement System, a cost-sharing multiple-employer defined benefit pension plan, based on a June 30, 2023, measurement date. It contains the actuarial information that will need to be disclosed in order to comply with GASB 67.

It is important to note that GASB 67 only defines pension liability for financial reporting purposes and does not apply to contribution amounts for pension funding purposes. The assumptions used in this valuation are the same as those in the Actuarial Valuation and Review report as of June 30, 2022, dated October 25, 2022, except as noted herein. Additional details can be found in that report.

This report was prepared in accordance with generally accepted actuarial principles and practices at the request of the Board to assist the Board and the member units in preparing their financial reports. The financial information on which our calculations were based was provided by the Office of the State Treasurer. That assistance is gratefully acknowledged.

The measurements shown in this actuarial valuation may not be applicable for other purposes. Future actuarial measurements may differ significantly from the current measurements presented in this report due to such factors as the following: plan experience differing from that anticipated by the economic or demographic assumptions; changes in economic or demographic assumptions; and changes in plan provisions or applicable law.

The actuarial calculations were directed under the supervision of Matthew A. Strom, FSA, MAAA, EA. I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion herein. To the best of my knowledge, the information supplied in this actuarial valuation is complete and accurate.

The investment return and inflation assumptions were selected by the Vermont Pension Investment Commission (VPIC). The remaining actuarial assumptions used in this actuarial valuation were selected by the Board based upon our analysis and recommendations. In my opinion, the assumptions are reasonable and take into account the experience of the Plan and reasonable expectations.

I look forward to reviewing this report with you and to answering any questions.

Sincerely,

Segal

A handwritten signature in black ink, appearing to read "Matthew A. Strom", written over a horizontal line.

Matthew A. Strom, FSA, MAAA, EA
Senior Vice President and Actuary

Table of Contents

Section 1: Valuation Summary

Important information about actuarial valuations.....	5
Purpose and basis.....	7
Highlights of the valuation.....	7

Section 2: Accounting Information

Exhibit 1 - Net Pension Liability	8
Exhibit 2 - Schedule of changes in Net Pension Liability – last ten fiscal years	12
Exhibit 3 - Schedule of contributions – last ten fiscal years	15

Section 3: Supplemental Information

Exhibit I: Actuarial Assumptions and Methods	17
Exhibit II: Summary of Plan Provisions	23

Appendix: Definition of Terms	26
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Section 1: Valuation Summary

Important information about actuarial valuations

In order to prepare a valuation, Segal relies on a number of input items. These include:

Plan of benefits	Plan provisions define the rules that will be used to determine benefit payments, and those rules, or the interpretation of them, may change over time. Even where they appear precise, outside factors may change how they operate. It is important to keep Segal informed with respect to plan provisions and administrative procedures, and to review the plan summary included in our report to confirm that Segal has correctly interpreted the plan of benefits.
Participant data	An actuarial valuation for a plan is based on data provided to the actuary by the System. Segal does not audit such data for completeness or accuracy, other than reviewing it for obvious inconsistencies compared to prior data and other information that appears unreasonable. It is important for Segal to receive the best possible data and to be informed about any known incomplete or inaccurate data.
Assets	The valuation is based on the market value of assets as of the valuation date, as provided by the System. The System uses an “actuarial value of assets” that differs from market value to gradually reflect year-to-year changes in the market value of assets in determining the contribution requirements.
Actuarial assumptions	In preparing an actuarial valuation, Segal projects the benefits to be paid to existing plan participants for the rest of their lives and the lives of their beneficiaries. This projection requires actuarial assumptions as to the probability of death, disability, withdrawal, and retirement of each participant for each year. In addition, the benefits projected to be paid for each of those events in each future year reflect actuarial assumptions as to salary increases and cost-of-living adjustments. The projected benefits are then discounted to a present value, based on the assumed rate of return that is expected to be achieved on the plan’s assets. There is a reasonable range for each assumption used in the projection and the results may vary materially based on which assumptions are selected. It is important for any user of an actuarial valuation to understand this concept. Actuarial assumptions are periodically reviewed to ensure that future valuations reflect emerging plan experience. While future changes in actuarial assumptions may have a significant impact on the reported results, that does not mean that the previous assumptions were unreasonable.
Modeling	Segal valuation results are based on proprietary actuarial modeling software. The actuarial valuation models generate a comprehensive set of liability and cost calculations that are presented to meet regulatory, legislative and client requirements. Deterministic cost projections are based on a proprietary forecasting model. Our Actuarial Technology and Systems unit, comprised of both actuaries and programmers, is responsible for the initial development and maintenance of these models. The models have a modular structure that allows for a high degree of accuracy, flexibility and user control. The client team programs the assumptions and the plan provisions, validates the models, and reviews test lives and results, under the direction of the supervising actuary.

Section 1: Valuation Summary

The user of Segal's actuarial valuation (or other actuarial calculations) should keep the following in mind:

The actuarial valuation is prepared at the request of the Vermont State Teachers' Retirement System. Segal is not responsible for the use or misuse of its report, particularly by any other party.

An actuarial valuation is a measurement of the plan's assets and liabilities at a specific date. Accordingly, except where otherwise noted, Segal did not perform an analysis of the potential range of future financial measures. The actual long-term cost of the plan will be determined by the actual benefits and expenses paid and the actual investment experience of the plan.

Sections of this report may include actuarial results that are not rounded, but that does not imply precision.

If the System is aware of any event or trend that was not considered in this valuation that may materially change the results of the valuation, Segal should be advised, so that we can evaluate it.

Segal does not provide investment, legal, accounting, or tax advice. Segal's valuation is based on our understanding of applicable guidance in these areas and of the plan's provisions, but they may be subject to alternative interpretations. The System should look to their other advisors for expertise in these areas.

As Segal has no discretionary authority with respect to the management or assets of the System, it is not a fiduciary in its capacity as actuaries and consultants with respect to the System.

Section 1: Valuation Summary

Purpose and basis

This report has been prepared by Segal to present certain disclosure information required by Governmental Accounting Standards Board Statement No. 67 as of June 30, 2023. This report, based on unaudited financial information as of June 30, 2023, provided by the Office of the State Treasurer and the Vermont State Teachers' Retirement System Actuarial Valuation Report as of June 30, 2022, dated October 25, 2022, reflects:

- The benefit provisions of the Pension Plan, as administered by the Board; and
- The characteristics of covered active members, inactive members, and retired members and beneficiaries as of June 30, 2022, provided by the Office of the State Treasurer.

The assumptions are the same as shown in the Vermont State Teachers' Retirement System Actuarial Valuation Report as of June 30, 2022, except as noted herein. Total Pension Liability as of June 30, 2023, reflects changes to actuarial assumptions that were adopted as part of the Actuarial Experience Review dated September 28, 2023.

The unaudited financial information as of June 30, 2023, has been updated since the Actuarial Valuation Report as of June 30, 2023, dated October 18, 2023, was published. The unaudited financial information reflected in this report was provided by the Office of the State Treasurer on November 6, 2023.

Highlights of the valuation

The following key findings were the result of this actuarial valuation:

- The Net Pension Liability (NPL) is equal to the difference between the Total Pension Liability (TPL) and the Plan's Fiduciary Net Position. The Plan's Fiduciary Net Position is equal to the market value of assets and, therefore, the NPL measure is very similar to an Unfunded Actuarial Accrued Liability (UAAL) on a market value basis. The NPL decreased from \$1.93 billion as of June 30, 2022, to \$1.87 billion as of June 30, 2023, and the Plan's Fiduciary Net Position as a percent of the TPL increased from 54.81% to 57.48%.
- The NPL, measured as of June 30, 2023, was determined based on the results of the actuarial valuation as of June 30, 2022, adjusted using standard actuarial techniques, and updated to reflect changes in the following assumptions: salary increases, assumed COLAs, death after retirement, death in active service, termination before retirement, disability incidence, and retirement. The NPL, measured as of June 30, 2022, was determined based on the results of the actuarial valuation as of June 30, 2021, adjusted using standard actuarial techniques.
- The discount rate used to determine the TPL and NPL as of June 30, 2023, and June 30, 2022, was 7.00%.

Section 2: Accounting Information

Exhibit 1 – Net Pension Liability

The components of the Net Pension Liability of the Vermont State Teachers' Retirement System are as follows:

	June 30, 2023	June 30, 2022
Total Pension Liability	\$4,397,768,659	\$4,267,971,774
Plan Fiduciary Net Position	2,527,709,397	2,339,412,945
System's Net Pension Liability	1,870,059,262	1,928,558,829
Plan Fiduciary Net Position as a percentage of the Total Pension Liability*	57.48%	54.81%

* These funded percentages are not necessarily appropriate for assessing the sufficiency of Plan assets to cover the estimated cost of settling the Plan's benefit obligation or the need for or the amount of future contributions.

Actuarial assumptions. The Total Pension Liability as of June 30, 2023, was determined by rolling forward the Total Pension Liability as of June 30, 2022, to June 30, 2023, using the following actuarial assumptions:

Investment rate of return	7.00%, net of pension plan investment expenses, including inflation
Inflation	2.30%
Salary increases	Ranging from 3.19% to 8.50%
Cost of Living Adjustments	<p>For active Group C members who are first eligible for normal retirement on or after July 1, 2022:</p> <ul style="list-style-type: none"> Assumed to occur on January 1 following two years of retirement at the rate of 1.20% per annum (beginning two years after the attainment of age 62 for members who elect reduced early retirement). The January 1, 2023, COLA was 2.00%¹. The January 1, 2024, COLA is expected to be 1.10%¹.

¹These amounts were required to be calculated in 2023 and 2024 as a result of Act 114 and Act 173; however, they will not be applied to any members in 2023 or 2024.

Section 2: Accounting Information

Cost of Living Adjustments (continued)

For all other members:

- Group A Assumed to occur on January 1 following one year of retirement at the rate of 2.30% per annum. The January 1, 2023, COLA was 5.00%. The January 1, 2024, COLA is expected to be 2.20%.
- Groups B/C Assumed to occur on January 1 following one year of retirement at the rate of 1.20% per annum (beginning one year after the attainment of age 62 for Group C members who elect reduced early retirement). The January 1, 2023, COLA was 2.50%. The January 1, 2024, COLA is expected to be 1.10%.

Mortality

- *Pre-Retirement:* PubT-2010 Teacher Employee Amount-Weighted Table with generational projection using scale MP-2021.
- *Retiree Healthy Post-Retirement:* PubT-2010 Teacher Healthy Retiree Amount-Weighted Table, with credibility adjustments of 103% and 93% for the Male and Female tables, respectively, with generational projection using scale MP-2021.
- *Beneficiary Healthy Post-Retirement:* Pub-2010 Contingent Survivor Amount-Weighted Table with generational projection using scale MP-2021.
- *Disabled Post-Retirement:* PubNS-2010 Non-Safety Disabled Retiree Amount-Weighted Mortality Table with generational projection using scale MP-2021.

The tables with the generational projection to the ages of members as of the measurement date reasonably reflect the mortality experience of the System as of the measurement date. The mortality rates were based on historical and current demographic data, adjusted to reflect health characteristics of the underlying groups and estimated future experience and professional judgment. The mortality tables were then adjusted to future years using the generational projection to reflect future mortality improvement between the measurement date and those years.

Section 2: Accounting Information

Determination of discount rate and investment rates of return

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 weighting the expected future real rates of return by the target asset allocation percentage and by adding expected inflation. Best estimates of arithmetic real rates of return for each major asset class included in the pension plan's target asset allocation as of June 30, 2023, are summarized in the following table:

Asset Class	Target Allocation	Long-Term Expected Real Rate of Return*
Global Equities	44.00%	5.35%
Private Equity	10.00%	7.50%
Emerging Market Debt	2.00%	5.00%
Private and Alternative Credit	10.00%	5.50%
Non-Core Real Estate	4.00%	5.50%
Core Fixed Income	19.00%	1.50%
Core Real Estate	4.00%	3.25%
US TIPS	2.00%	1.50%
Infrastructure/Farmland	5.00%	4.25%
	100.00%	

* Calculated as the Arithmetic Rates of Return minus the Rate of Inflation, as provided by the Vermont State Treasurers' Office

Section 2: Accounting Information

Discount rate: The discount rate used to measure the Total Pension Liability was 7.00%. In accordance with paragraph 43 of GASB 67, professional judgement was applied to determine that the System's projected Fiduciary Net Position exceeds projected benefit payments for current active and inactive members for all years. Our analysis was based on the expectation that the employer will continue to contribute an amount at least equal to the actuarially determined contribution, which is comprised of an employer normal cost payment and a payment to reduce the unfunded liability to zero by June 30, 2038, in accordance with Vermont statute. Therefore, the long-term expected rate of return on pension plan investments was applied to all periods of projected benefit payments to determine the Total Pension Liability.

Discount rate sensitivity

Sensitivity of the Net Pension Liability to changes in the discount rate. The following presents the Net Pension Liability, calculated using the discount rate of 7.00%, as well as what the Net Pension Liability would be if it were calculated using a discount rate that is 1-percentage-point lower (6.00%) or 1-percentage-point higher (8.00%) than the current rate:

	1% Decrease (6.00%)	Current Discount Rate (7.00%)	1% Increase (8.00%)
Net Pension Liability as of June 30, 2023	\$2,408,848,881	\$1,870,059,262	\$1,420,758,854

Section 2: Accounting Information

Exhibit 2 – Schedule of changes in Net Pension Liability – last ten fiscal years

	Year End June 30,				
	2023	2022	2021	2020	2019
Total Pension Liability					
Service cost	\$78,228,465	\$71,860,741	\$72,148,904	\$40,744,545	\$39,766,250
Interest	295,777,069	285,340,636	270,700,007	255,392,953	246,468,440
Differences between expected and actual experience	15,227,334	52,713,885	88,064,572	31,636,975	28,997,522
Changes of assumptions	-17,808,918	0	0	310,967,594	0
Changes of benefit terms	0	-32,528,331	0	0	0
Benefit payments, including refunds of employee contributions	<u>-241,627,065</u>	<u>-227,698,445</u>	<u>-215,248,507</u>	<u>-201,237,170</u>	<u>-193,196,825</u>
Net change in Total Pension Liability	\$129,796,885	\$149,688,486	\$215,664,976	\$437,504,897	\$122,035,387
Total Pension Liability – beginning	<u>4,267,971,774</u>	<u>4,118,283,288</u>	<u>3,902,618,312</u>	<u>3,465,113,415</u>	<u>3,343,078,028</u>
Total Pension Liability – ending (a)	\$4,397,768,659	\$4,267,971,774	\$4,118,283,288	\$3,902,618,312	\$3,465,113,415
Plan Fiduciary Net Position					
Contributions – employer	\$188,096,219	\$314,663,632	\$125,910,465	\$120,247,389	\$113,747,925
Contributions – employee	51,997,621	44,597,049	42,199,015	40,598,283	39,075,342
Net investment income	178,491,952	-223,275,025	512,194,450	83,105,318	109,429,147
Benefit payments, including refunds of employee contributions	-241,627,065	-227,698,445	-215,248,507	-201,237,170	-193,196,825
Administrative expenses	-3,046,013	-2,715,251	-2,782,425	-2,814,955	-2,714,661
Other	<u>14,383,738</u>	<u>11,047,477</u>	<u>9,030,628</u>	<u>7,102,452</u>	<u>5,775,084</u>
Net change in Fiduciary Net Position	\$188,296,452	-\$83,380,563	\$471,303,626	\$47,001,317	\$72,116,012
Plan Fiduciary Net Position – beginning	<u>2,339,412,945</u>	<u>2,422,793,508</u>	<u>1,951,489,882</u>	<u>1,904,488,565</u>	<u>1,832,372,553</u>
Plan Fiduciary Net Position – ending (b)	\$2,527,709,397	\$2,339,412,945	\$2,422,793,508	\$1,951,489,882	\$1,904,488,565
Net Pension Liability – ending: (a)-(b)	\$1,870,059,262	\$1,928,558,829	\$1,695,489,780	\$1,951,128,430	\$1,560,624,850
Plan's Fiduciary Net Position as a percentage of the Total Pension Liability	57.48%	54.81%	58.83%	50.00%	54.96%
Covered-employee payroll	\$701,566,613	\$657,934,953	\$645,902,984	\$624,908,253	\$612,899,069
Net Pension Liability as a percentage of covered-employee payroll	266.55%	293.12%	262.50%	312.23%	254.63%

Note: Covered-employee payroll reflects actual compensation amounts from the prior Plan year.

Section 2: Accounting Information

Exhibit 2 – Schedule of changes in Net Pension Liability – last ten fiscal years (continued)

	Year End June 30,				
	2018	2017	2016	2015	2014
Total Pension Liability					
Service cost	\$40,117,462	\$35,383,370	\$34,979,249	\$33,613,557	\$33,143,487
Interest	237,746,182	228,938,418	222,185,083	215,447,502	206,150,481
Differences between expected and actual experience	59,468,842	12,523,150	3,612,809	20,002,876	0
Changes of assumptions	-32,956,623	185,849,013	-7,223,825	57,488,610	0
Changes of benefit terms	0	0	0	0	0
Benefit payments, including refunds of employee contributions	<u>-182,258,923</u>	<u>-172,156,063</u>	<u>-162,751,410</u>	<u>-150,732,845</u>	<u>-140,846,837</u>
Net change in Total Pension Liability	\$122,116,940	\$290,537,888	\$90,801,906	\$175,819,700	\$98,447,131
Total Pension Liability – beginning	<u>3,220,961,088</u>	<u>2,930,423,200</u>	<u>2,839,621,294</u>	<u>2,663,801,594</u>	<u>2,565,354,463</u>
Total Pension Liability – ending (a)	\$3,343,078,028	\$3,220,961,088	\$2,930,423,200	\$2,839,621,294	\$2,663,801,594
Plan Fiduciary Net Position					
Contributions – employer	\$110,353,599	\$78,663,674	\$73,225,064	\$72,908,805	\$71,869,736
Contributions – employee	37,888,566	36,142,411	35,408,763	34,863,531	32,558,584
Net investment income	125,566,281	173,166,614	19,877,271	-7,566,696	212,338,194
Benefit payments, including refunds of employee contributions	-182,258,923	-172,156,063	-162,751,410	-150,732,845	-140,846,837
Administrative expenses	-2,083,260	-2,214,235	-1,797,512	-2,259,402	-26,115,813
Other	<u>4,348,717</u>	<u>4,055,423</u>	<u>3,821,132</u>	<u>538,444</u>	<u>1,209,177</u>
Net change in Fiduciary Net Position	\$93,814,980	\$117,657,824	-\$32,216,692	-\$52,248,163	\$151,013,041
Plan Fiduciary Net Position – beginning	<u>1,738,557,573</u>	<u>1,620,899,749</u>	<u>1,653,116,441</u>	<u>1,705,364,604</u>	<u>1,554,351,563</u>
Plan Fiduciary Net Position – ending (b)	\$1,832,372,553	\$1,738,557,573	\$1,620,899,749	\$1,653,116,441	\$1,705,364,604
Net Pension Liability – ending: (a)-(b)	\$1,510,705,475	\$1,482,403,515	\$1,309,523,451	\$1,186,504,853	\$958,436,990
Plan's Fiduciary Net Position as a percentage of the Total Pension Liability	54.81%	53.98%	55.31%	58.22%	64.02%
Covered-employee payroll	\$607,354,756	\$586,397,072	\$557,708,310	\$567,073,601	\$563,623,421
Net Pension Liability as a percentage of covered-employee payroll	248.74%	252.80%	234.80%	209.23%	170.05%

Note: Covered-employee payroll reflects actual compensation amounts from the prior Plan year.

Section 2: Accounting Information

Notes to Exhibit 2:

- Changes in Assumptions:* Effective for the June 30, 2023, actuarial valuation, the following assumptions were updated:
- Assumed rates of salary increase were adjusted, generally decreased, based on plan experience.
 - COLA assumptions were decreased as follows:
 - Active Group C members who were eligible for normal retirement before July 1, 2022, or Group C members who retired before July 1, 2022: decreased from 1.35% to 1.20%.
 - Group B members: decreased from 1.35% to 1.20%.
 - Group A members: decreased from 2.40% to 2.30%.
 - Mortality assumptions changed as follows:
 - Healthy retiree mortality was changed from the PubT-2010 Teacher Healthy Retiree Amount-Weighted (sex-specific) tables to the PubT-2010 Teacher Healthy Retiree Amount-Weighted (sex-specific) tables with 103% and 93% adjustments for males and females, respectively.
 - Healthy beneficiary mortality was changed from 109% of the Pub-2010 Contingent Survivor Amount-Weighted (sex-specific) tables to the unadjusted Pub-2010 Contingent Survivor Amount-Weighted (sex-specific) tables.
 - Mortality improvement scale was changed from generational projection using scale MP-2019 to generational projection using scale MP-2021 for all assumptions.
 - Assumed active retirement rates for Group C Grandfathered (GF) and Group C Non-Grandfathered (NGF) were adjusted based on plan experience.
 - Assumed inactive vested retirement rates for Group C-NGF for pre-Normal Retirement Ages were increased based on plan experience.
 - Assumed termination rates were adjusted based on plan experience.
 - Assumed disability rates uniformly decreased by 15% for females and uniformly increased by 20% for males.
- Changes in Plan Provisions:* There have been no changes in plan provisions since the last measurement date.

Section 2: Accounting Information

Exhibit 3 – Schedule of contributions – last ten fiscal years

	Year End June 30				
	2023	2022	2021	2020	2019
Actuarially determined contribution	\$194,961,651	\$196,206,504	\$132,141,701	\$126,197,389	\$105,640,777
Contributions in relation to the actuarially determined contribution*	<u>201,925,261</u>	<u>325,244,828**</u>	<u>134,541,278</u>	<u>126,941,582</u>	<u>119,174,913</u>
Contribution deficiency (excess)	-\$6,963,610	-\$129,038,324	-\$2,399,577	-\$744,193	-\$13,534,136
Covered-employee payroll	\$701,566,613	\$657,934,953	\$645,902,984	\$624,908,253	\$612,899,069
Contributions as a percentage of covered-employee payroll	28.78%	49.43%	20.83%	20.31%	19.44%

	2018	2017	2016	2015	2014
Actuarially determined contribution	\$88,409,437	\$82,659,576	\$76,102,909	\$72,857,863	\$68,352,825
Contributions in relation to the actuarially determined contribution*	<u>114,598,921</u>	<u>82,887,174</u>	<u>76,947,868</u>	<u>72,908,805</u>	<u>72,668,412</u>
Contribution deficiency (excess)	-\$26,189,484	-\$227,598	-\$844,959	-\$50,942	-\$4,315,587
Covered-employee payroll	\$607,354,756	\$586,397,072	\$557,708,310	\$567,073,601	\$563,623,421
Contributions as a percentage of covered-employee payroll	18.87%	14.13%	13.80%	12.86%	12.89%

* Includes a portion of the contribution amount denoted as "other" in Exhibit 2.

** Includes an additional one-time payment of \$125 million per Act 114.

Note: Actuarially determined contributions for a given fiscal year are based on results from the June 30 actuarial valuation two years prior.

Section 2: Accounting Information

Notes to Exhibit 3:

Valuation date	Actuarially determined contribution for the year ending June 30, 2023, is based on results from the June 30, 2021, actuarial valuation, and was calculated as of June 30, with appropriate interest to the middle of the fiscal year.
Actuarial cost method	Entry Age Normal actuarial cost method
Amortization method	Amortization payments calculated to fully fund unfunded actuarial accrued liability with annual increases of 3% over a closed period.
Remaining amortization period	17 years as of July 1, 2021 The amortization of unfunded actuarial accrued liability (UAAL) within the actuarially determined contribution rate calculation is based on payments increasing at 3% per year required to amortize the UAAL over the 30-year closed period that began July 1, 2008.
Asset valuation method	The amount of the assets for valuation purposes equals the preliminary asset value plus 20% of the difference between market and preliminary asset values. The preliminary asset value is equal to the previous year's asset value (for valuation purposes) adjusted for contributions less benefit payments and expenses plus expected investment income. If necessary, a further adjustment is made to ensure that the valuation assets are within 20% of the market value.
Actuarial assumptions:	
Investment rate of return	7.00%, net of pension plan investment expenses, including inflation
Inflation rate	2.30%
Projected salary increases	Ranging from 3.30% to 10.50% based on age
Mortality	<ul style="list-style-type: none"> • <i>Pre-Retirement</i>: PubT-2010 Teacher Employee Amount-Weighted Table with generational projection using scale MP-2019 • <i>Retiree Healthy Post-Retirement</i>: PubT-2010 Teacher Healthy Retiree Amount-Weighted Table with generational projection using scale MP-2019 • <i>Beneficiary Healthy Post-Retirement</i>: 109% of the Pub-2010 Contingent Survivor Amount-Weighted Table with generational projection using scale MP-2019 • <i>Disabled Post-Retirement</i>: PubNS-2010 Non-Safety Disabled Retiree Amount-Weighted Mortality Table with generational projection using scale MP-2019 <p>The tables with the generational projection to the ages of members as of the measurement date reasonably reflect the mortality experience of the System as of the measurement date. The mortality rates were based on historical and current demographic data, adjusted to reflect health characteristics of the underlying groups and estimated future experience and professional judgment. The mortality tables were then adjusted to future years using the generational projection to reflect future mortality improvement between the measurement date and those years.</p>
Other assumptions	Same as those used in the June 30, 2021, funding actuarial valuation.

Section 3: Supplemental Information

Exhibit I: Actuarial Assumptions and Methods

Rationale for Assumptions:	The information and analysis used in selecting each assumption that has a significant effect on this actuarial valuation is shown in the Actuarial Experience Review dated September 28, 2023 (as prepared by Segal) and in the Economic Experience Study (as prepared by the Gabriel Roeder Smith actuarial consulting firm) adopted by the Vermont Pension Investment Commission during their meeting on July 25, 2023.																						
Roll-forward Techniques:	The results as of June 30, 2023, are based on the results of the Vermont State Teachers' Retirement System Actuarial Valuation Report as of June 30, 2022, adjusted forward, using standard actuarial techniques. Total Pension Liability as of June 30, 2023, reflects changes to actuarial assumptions that were adopted as part of the Actuarial Experience Review dated September 28, 2023.																						
Inflation:	2.30%																						
Investment Return:	7.00% The investment return assumption is a long-term estimate derived from historical data, current and recent market expectations, and professional judgment. As part of the analysis, a building block approach was used that reflects inflation expectations and anticipated risk premiums for each of the portfolio's asset classes, as well as the System's target asset allocation.																						
Salary Increases:	<table border="1"> <thead> <tr> <th>Age</th> <th>Annual Rate of Salary Increase (%)</th> </tr> </thead> <tbody> <tr> <td>20</td> <td>8.50</td> </tr> <tr> <td>25</td> <td>7.53</td> </tr> <tr> <td>30</td> <td>6.36</td> </tr> <tr> <td>35</td> <td>5.77</td> </tr> <tr> <td>40</td> <td>5.27</td> </tr> <tr> <td>45</td> <td>4.67</td> </tr> <tr> <td>50</td> <td>4.18</td> </tr> <tr> <td>55</td> <td>3.77</td> </tr> <tr> <td>60</td> <td>3.57</td> </tr> <tr> <td>65</td> <td>3.19</td> </tr> </tbody> </table>	Age	Annual Rate of Salary Increase (%)	20	8.50	25	7.53	30	6.36	35	5.77	40	5.27	45	4.67	50	4.18	55	3.77	60	3.57	65	3.19
Age	Annual Rate of Salary Increase (%)																						
20	8.50																						
25	7.53																						
30	6.36																						
35	5.77																						
40	5.27																						
45	4.67																						
50	4.18																						
55	3.77																						
60	3.57																						
65	3.19																						

Section 3: Supplemental Information

Cost-of-Living Adjustments (COLA):

For active Group C members who are first eligible for normal retirement on or after July 1, 2022:

- Assumed to occur on January 1 following two years of retirement at the rate of 1.20% per annum (beginning two years after the attainment of age 62 for members who elect reduced early retirement). The January 1, 2023, COLA was 2.00%¹. The January 1, 2024, COLA is expected to be 1.10%¹.

For all other members:

- Group A Assumed to occur on January 1 following one year of retirement at the rate of 2.30% per annum. The January 1, 2023, COLA was 5.00%. The January 1, 2024, COLA is expected to be 2.20%.
- Groups B/C Assumed to occur on January 1 following one year of retirement at the rate of 1.20% per annum (beginning one year after the attainment of age 62 for Group C members who elect reduced early retirement). The January 1, 2023, COLA was 2.50%. The January 1, 2024, COLA is expected to be 1.10%.

¹These amounts were required to be calculated in 2023 and 2024 as a result of Act 114 and Act 173; however, they will not be applied to any members in 2023 or 2024.

Mortality Rates:

Pre-retirement:

- All Groups PubT-2010 Teacher Employee Amount-Weighted Table with generational projection using scale MP-2021.

Healthy Post-retirement - Retirees:

- All Groups PubT-2010 Teacher Healthy Retiree Amount-Weighted Table, with credibility adjustments of 103% and 93% for the Male and Female tables, respectively, with generational projection using scale MP-2021.

Healthy Post-retirement - Beneficiaries:

- All Groups Pub-2010 Contingent Survivor Amount-Weighted Table with generational projection using scale MP-2021.

Disabled Post-retirement:

- All Groups PubNS-2010 Non-Safety Disabled Retiree Amount-Weighted Mortality Table with generational projection using scale MP-2021.

The tables with the generational projection to the ages of members as of the measurement date reasonably reflect the mortality experience of the System as of the measurement date. The mortality tables were then adjusted to future years using the generational projection to reflect future mortality improvement between the measurement date and those years.

Section 3: Supplemental Information

Separation from Service before Retirement (Due to Withdrawal and Disability):

Representative values of the assumed annual rates of withdrawal and disability are as follows:

Age	Rate (%)		
	Withdrawal	Disability	
	Unisex	Male	Female
25	9.00	0.0060	0.0068
30	5.80	0.0084	0.0068
35	3.50	0.0108	0.0068
40	1.90	0.0168	0.0094
45	1.20	0.0276	0.0204
50	0.85	0.0720	0.0629
55	0.75	0.0480	0.0425
60	0.75	0.1584	0.0748
65	0.75	0.3888	0.1777

Section 3: Supplemental Information

Retirement Rates:

Age	Group A		Group C Grandfathered
	<30 Years of Service	30+ Years of Service	All Members
50	0.00%	40.00%	40.00%
51	0.00	20.00	20.00
52	0.00	20.00	20.00
53	0.00	20.00	20.00
54	0.00	20.00	20.00
55	7.50	20.00	10.00
56	7.50	10.00	10.00
57	7.50	10.00	10.00
58	7.50	10.00	10.00
59	12.50	10.00	12.50
60	30.00	30.00	15.00
61	25.00	25.50	17.00
62	30.00	25.00	30.00
63	30.00	22.00	35.00
64	30.00	22.00	40.00
65	40.00	33.00	50.00
66	40.00	33.00	50.00
67	40.00	33.00	50.00
68	50.00	22.00	50.00
69	50.00	33.00	50.00
70+	100.00	100.00	100.00

Section 3: Supplemental Information

Retirement Rates (continued):

Age	Group C Non-Grandfathered		
	Before Rule of 90	1 st Year after Rule of 90	1+ Years after Rule of 90
<56	2.50%	22.50%	20.00%
56	5.00	22.50	15.00
57	5.00	22.50	15.00
58	5.00	22.50	10.00
59	5.00	22.50	12.50
60	7.50	22.50	12.50
61	12.50	22.50	15.00
62	15.00	22.50	15.00
63	20.00	22.50	17.50
64	25.00	22.50	20.00
65	35.00	35.00	35.00
66	35.00	35.00	35.00
67	35.00	35.00	35.00
68	35.00	35.00	35.00
69	35.00	35.00	35.00
70+	100.00	100.00	100.00

Inactive Members as Reported by the System:

Not Vested: Valuation liability equals 100% of accumulated contributions.

Vested: Valuation liability based on accrued benefit and assumed to retire as follows:

- Group A: 10% of members are assumed to retire from Early Retirement Age for each year until Normal Retirement Age, then 100% of members are assumed to retire at their Normal Retirement Age.
- Group C-NGF: 15% of members are assumed to retire from Early Retirement Age for each year until Normal Retirement Age, then 100% of members are assumed to retire at their Normal Retirement Age.
- Group C-GF: 50% of members are assumed to retire from age 62-69, then 100% at age 70.

Section 3: Supplemental Information

Deferred Members as Reported by the System:	Valuation liability based on accrued benefit and assumed to retire as follows: <ul style="list-style-type: none">– Group A: 10% of members are assumed to retire from Early Retirement Age for each year until Normal Retirement Age, then 100% of members are assumed to retire at their Normal Retirement Age.– Group C-NGF: 15% of members are assumed to retire from Early Retirement Age for each year until Normal Retirement Age, then 100% of members are assumed to retire at their Normal Retirement Age.– Group C-GF: 50% of members are assumed to retire from age 62-69, then 100% at age 70.
Unknown Data for Members:	Same as those exhibited by members with similar known characteristics. If not specified, members are assumed to be male.
Percent Married:	85% of male members and 35% of female members are assumed to be married.
Age of Spouse:	Females three years younger than males.
Benefit Elections:	All members are assumed to elect the single life annuity option.
Actuarial Cost Method:	Entry Age Actuarial Cost Method. Entry Age is the age at date of employment or, if date is unknown, current age minus years of service. Normal Cost and Actuarial Accrued Liability are calculated on an individual basis and are allocated by salary, with Normal Cost determined using the plan of benefits applicable to each member.
Changes in Actuarial Assumptions:	Effective for the June 30, 2023, actuarial valuation, the following actuarial assumptions were changed according to past experience and future expectations: <ul style="list-style-type: none">• Salary Increases,• Assumed COLAs,• Death After Retirement,• Death in Active Service,• Termination Before Retirement,• Disability Incidence, and• Retirement.

Section 3: Supplemental Information

Exhibit II: Summary of Plan Provisions

This exhibit summarizes the major provisions of the Plan included in the valuation. It is not intended to be, nor should it be interpreted as, a complete statement of all plan provisions.

Effective Date:	July 1, 1947.		
Creditable Service:	Service as a member plus purchased service.		
Average Final Compensation (AFC):	<ul style="list-style-type: none"> Average annual compensation during highest 3 consecutive years. 		
Grandfathered Status:	<ul style="list-style-type: none"> Group C members who were within five years of normal retirement eligibility as defined prior to July 1, 2010, are “grandfathered”. 		
Normal Retirement - Eligibility:	<ul style="list-style-type: none"> Group A Group C 	<ul style="list-style-type: none"> Age 60 or 30 years of creditable service. Grandfathered Age 62 or 30 years of creditable service Non-grandfathered Age 65 or age plus creditable service equal to 90. 	
Normal Retirement - Amount:	<ul style="list-style-type: none"> Group A Group C 	<ul style="list-style-type: none"> Member annuity based on accumulated contributions plus a pension, which, with member annuity, equals 1/60th of AFC times creditable service. Grandfathered Non-grandfathered 	<ul style="list-style-type: none"> Member annuity based on accumulated contributions plus a pension, which, with member annuity, equals 1/80th of AFC times creditable service prior to July 1, 1990, plus 1/60th of AFC times creditable service after July 1, 1990. Member annuity based on accumulated contributions plus a pension, which, with member annuity, equals 1/80th of AFC times creditable service prior to July 1, 1990, plus 1/60th of AFC times creditable service after July 1, 1990 up to 20 years of service, plus 1/50th of AFC for years of service after 20. If a member already has 20 or more years of service on June 30, 2010, the 1/50th will be applied to all service accrued after July 1, 2010. <p>The minimum benefit applicable for Group A members after 30 years of creditable service (pro-rata for service less than 30 years) is subject to 16 V.S.A. § 1937(b)(2).</p> <p>Maximum benefit applicable to Group C: Grandfathered maximum benefit is 50% of AFC up to June 30, 2010. May continue to accrue up to 53.34% of AFC with service earned after July 1, 2010. Non-grandfathered maximum benefit is 60% of AFC.</p>

Section 3: Supplemental Information

Early Retirement – Eligibility:	<ul style="list-style-type: none"> • Group A Age 55. • Group C Age 55 with 5 years of creditable service.
Early Retirement – Amount:	<ul style="list-style-type: none"> • Group A Actuarial equivalent of normal retirement allowance using AFC and creditable service at early retirement. • Group C Grandfathered Accrued normal benefit reduced 6% for each year prior to age 62. Non-grandfathered Accrued normal benefit reduced by actuarial reduction from normal retirement age.
Vesting:	<ul style="list-style-type: none"> • All groups – 5 years of creditable service.
Disability Retirement - Eligibility:	All groups – Total and permanent disability after 5 years of creditable service (5 years preceding retirement served in State).
Disability Retirement - Amount:	All groups – Calculated as a service allowance based on AFC and creditable service at disability retirement, subject to a 25% of AFC minimum.
Death Benefit - Eligibility:	<ul style="list-style-type: none"> • Group A Age 60 or 30 years of creditable service; 10 years of creditable service if in service at death. • Group C Age 55 and 5 years of creditable service or 10 years of creditable service.
Death Benefit - Amount:	All groups – Accrued allowance paid under 100% survivorship option. If the eligibility requirements are not met or if beneficiary so elects, the member's accumulated contributions are paid to the beneficiary or estate. Certain children's benefits may also be payable.
Post-Retirement Adjustments:	<ul style="list-style-type: none"> • Group A Allowances in payment for at least one year increased on each January 1 by the net percentage increase in Consumer Price Index (CPI). The maximum net percentage increase in CPI is capped at 5%. If the net percentage increase in CPI is less than 0%, members will not receive an increase. • Group B Allowances in payment for at least one year increased on each January 1 by half of the net percentage increase in CPI. The maximum net percentage increase in CPI is capped at 5%. If the net percentage increase in CPI is less than 0%, members will not receive an increase. • Group C For active members who are first eligible for normal retirement on or after July 1, 2022: - Allowances in payment for at least two years increased on each January 1 by half of the net percentage increase in CPI. The maximum net percentage increase in CPI is capped at 4%. If the net percentage increase in CPI is less than 0%, members will not receive an increase. For members receiving a reduced early retirement allowance, the adjustment will not apply before age 62 for grandfathered members or age 65 for non-grandfathered members.

Section 3: Supplemental Information

Post-Retirement Adjustments (continued):

For all other members:

- Allowances in payment for at least one year increased on each January 1 by half of the net percentage increase in CPI. The maximum net percentage increase in CPI is capped at 5%. If the net percentage increase in CPI is less than 0%, members will not receive an increase. For members receiving a reduced early retirement allowance, the adjustment will not apply before age 62 for grandfathered members or age 65 for non-grandfathered members

Refund of Contributions:

If no other beneficiary is payable, a terminated member receives his accumulated contributions with interest.

Member Contribution Rates:

- Group A 5.5% of earnable compensation. Contributions stop after 25 years of creditable service.
- Group C Member contributions as a percentage of earnable compensation are described in the table below:

Earnable Compensation	FY23	FY24	FY25+
\$0-\$40K	6.00%	6.10%	6.15%
\$40K-\$50K	6.05%	6.15%	6.20%
\$50K-\$60K	6.10%	6.25%	6.30%
\$60K-\$70K	6.20%	6.35%	6.40%
\$70K-\$80K	6.25%	6.50%	6.55%
\$80K-\$90K	6.35%	6.75%	6.80%
\$90K-\$100K	6.50%	7.00%	7.10%
\$100K+	6.65%	7.25%	7.35%

Changes in Plan Provisions:

Aside from the future contribution rate increases shown above, there were no other changes in plan provisions since the prior valuation.

Appendix: Definition of Terms

Definitions of certain terms as they are used in Statement 68. The terms may have different meanings in other contexts.

Active Employees:	Individuals employed at the end of the reporting or measurement period, as applicable.
Actual Contributions:	Cash contributions recognized as additions to a pension Plan Fiduciary Net Position.
Actuarial Present Value of Projected Benefit Payments:	Projected benefit payments discounted to reflect the expected effects of the time value (present value) of money and the probabilities of payment.
Actuarial Valuation:	The determination, as of a point in time (the actuarial valuation date), of the service cost, Total Pension Liability, and related actuarial present value of projected benefit payments for pensions performed in conformity with Actuarial Standards of Practice unless otherwise specified by the GASB.
Actuarial Valuation Date:	The date as of which an actuarial valuation is performed.
Actuarially Determined Contribution:	A target or recommended contribution to a defined benefit pension plan for the reporting period, determined in conformity with Actuarial Standards of Practice based on the most recent measurement available when the contribution for the reporting period was adopted.
Ad Hoc Cost-of-Living Adjustments (Ad Hoc COLAs):	Cost-of-living adjustments that require a decision to grant by the authority responsible for making such decisions.
Ad Hoc Postemployment Benefit Changes:	Postemployment benefit changes that require a decision to grant by the authority responsible for making such decisions.
Agent Employer:	An employer whose employees are provided with pensions through an agent multiple-employer defined benefit pension plan.
Agent Multiple-Employer Defined Benefit Pension Plan (Agent Pension Plan):	A multiple-employer defined benefit pension plan in which pension plan assets 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.
Allocated Insurance Contract:	A contract with an insurance company under which related payments to the insurance company are currently used to purchase immediate or deferred annuities for individual employees. Also may be referred to as an annuity contract.

Appendix: Definition of Terms

Automatic Cost-of-Living Adjustments (Automatic COLAs):	Cost-of-living adjustments that occur without a requirement for a decision to grant by a responsible authority, including those for which the amounts are determined by reference to a specified experience factor (such as the earnings experience of the pension plan) or to another variable (such as an increase in the consumer price index).
Automatic Postemployment Benefit Changes:	Postemployment benefit changes that occur without a requirement for a decision to grant by a responsible authority, including those for which the amounts are determined by reference to a specified experience factor (such as the earnings experience of the pension plan) or to another variable (such as an increase in the consumer price index).
Closed Period:	A specific number of years that is counted from one date and declines to zero with the passage of time. For example, if the recognition period initially is five years on a closed basis, four years remain after the first year, three years after the second year, and so forth.
Collective Deferred Outflows of Resources and Deferred Inflows of Resources Related to Pensions:	Deferred outflows of resources and deferred inflows of resources related to pensions arising from certain changes in the collective Net Pension Liability.
Collective Net Pension Liability:	The Net Pension Liability for benefits provided through (1) a cost-sharing pension plan or (2) a single-employer or agent pension plan in circumstances in which there is a special funding situation.
Collective Pension Expense:	Pension expense arising from certain changes in the collective Net Pension Liability.
Contributions:	Additions to a pension Plan Fiduciary Net Position for amounts from employers, non-employer contributing entities (for example, state government contributions to a local government pension plan), or employees. Contributions can result from cash receipts by the pension plan or from recognition by the pension plan of a receivable from one of these sources.
Cost-of-Living Adjustments:	Postemployment benefit changes intended to adjust benefit payments for the effects of inflation.
Cost-Sharing Employer:	An employer whose employees are provided with pensions through a cost-sharing multiple-employer defined benefit pension plan.
Cost-Sharing Multiple-Employer Defined Benefit Pension Plan (Cost-Sharing Pension Plan):	A multiple-employer defined benefit pension plan in which the pension obligations to the employees of more than one employer are pooled and pension plan assets can be used to pay the benefits of the employees of any employer that provides pensions through the pension plan.
Covered-Employee Payroll:	The payroll of employees that are provided with pensions through the pension plan.

Appendix: Definition of Terms

Deferred Retirement Option Program (DROP):	A program that permits an employee to elect a calculation of benefit payments based on service credits and salary, as applicable, as of the DROP entry date. The employee continues to provide service to the employer and is paid for that service by the employer after the DROP entry date; however, the pensions that would have been paid to the employee (if the employee had retired and not entered the DROP) are credited to an individual employee account within the defined benefit pension plan until the end of the DROP period.
Defined Benefit Pension Plans:	Pension plans that are used to provide defined benefit pensions.
Defined Benefit Pensions:	Pensions for which the income or other benefits that the employee will receive at or after separation from employment are defined by the benefit terms. The pensions may be stated as a specified dollar amount or as an amount that is calculated based on one or more factors such as age, years of service, and compensation. (A pension that does not meet the criteria of a defined contribution pension is classified as a defined benefit pension for purposes of Statements 67/68.)
Defined Contribution Pension Plans:	Pension plans that are used to provide defined contribution pensions.
Defined Contribution Pensions:	Pensions having terms that (1) provide an individual account for each employee; (2) define the contributions that an employer is required to make (or the credits that it is required to provide) to an active employee's account for periods in which that employee renders service; and (3) provide that the pensions an employee will receive will depend only on the contributions (or credits) to the employee's account, actual earnings on investments of those contributions (or credits), and the effects of forfeitures of contributions (or credits) made for other employees, as well as pension plan administrative costs, that are allocated to the employee's account.
Discount Rate:	<p>The single rate of return that, when applied to all projected benefit payments, results in an actuarial present value of projected benefit payments equal to the total of the following:</p> <ol style="list-style-type: none">1. The actuarial present value of benefit payments projected to be made in future periods in which (a) the amount of the pension plan's Fiduciary Net Position is projected (under the requirements of Statements 67/68) to be greater than the benefit payments that are projected to be made in that period and (b) pension plan assets up to that point are expected to be invested using a strategy to achieve the long-term expected rate of return, calculated using the long-term expected rate of return on pension plan investments.2. The actuarial present value of projected benefit payments not included in (1), calculated using the municipal bond rate.

Appendix: Definition of Terms

Entry Age Actuarial Cost Method:	A method under which the actuarial present value of the projected benefits of each individual included in an actuarial valuation is allocated on a level basis over the earnings or service of the individual between entry age and assumed exit age(s). The portion of this actuarial present value allocated to a valuation year is called 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 called the actuarial accrued liability.
Inactive Employees:	Terminated individuals that have accumulated benefits but are not yet receiving them, and retirees or their beneficiaries currently receiving benefits.
Measurement Period:	The period between the prior and the current measurement dates.
Multiple-Employer Defined Benefit Pension Plan:	A defined benefit pension plan that is used to provide pensions to the employees of more than one employer.
Net Pension Liability (NPL):	The liability of employers and non-employer contributing entities to employees for benefits provided through a defined benefit pension plan.
Non-Employer Contributing Entities:	Entities that make contributions to a pension plan that is used to provide pensions to the employees of other entities. For purposes of Statements 67/68, employees are not considered nonemployer contributing entities.
Other Postemployment Benefits:	All postemployment benefits other than retirement income (such as death benefits, life insurance, disability, and long-term care) that are provided separately from a pension plan, as well as postemployment healthcare benefits, regardless of the manner in which they are provided. Other postemployment benefits do not include termination benefits.
Pension Plans:	Arrangements through which pensions are determined, assets dedicated for pensions are accumulated and managed and benefits are paid as they come due.
Pensions:	Retirement income and, if provided through a pension plan, postemployment benefits other than retirement income (such as death benefits, life insurance, and disability benefits). Pensions do not include postemployment healthcare benefits and termination benefits.
Plan Members:	Individuals that are covered under the terms of a pension plan. Plan members generally include (1) employees in active service (active plan members) and (2) terminated employees who have accumulated benefits but are not yet receiving them and retirees or their beneficiaries currently receiving benefits (inactive plan members).
Postemployment:	The period after employment.
Postemployment Benefit Changes:	Adjustments to the pension of an inactive employee.
Postemployment Healthcare Benefits:	Medical, dental, vision, and other health-related benefits paid subsequent to the termination of employment.
Projected Benefit Payments:	All benefits estimated to be payable through the pension plan to current active and inactive employees as a result of their past service and their expected future service.

Appendix: Definition of Terms

Public Employee Retirement System:	A special-purpose government that administers one or more pension plans; also may administer other types of employee benefit plans, including postemployment healthcare plans and deferred compensation plans.
Real Rate of Return:	The rate of return on an investment after adjustment to eliminate inflation.
Service Costs:	The portions of the actuarial present value of projected benefit payments that are attributed to valuation years.
Single Employer:	An employer whose employees are provided with pensions through a single-employer defined benefit pension plan.
Single-Employer Defined Benefit Pension Plan (Single-Employer Pension Plan):	A defined benefit pension plan that is used to provide pensions to employees of only one employer.
Special Funding Situations:	<p>Circumstances in which a non-employer entity is legally responsible for making contributions directly to a pension plan that is used to provide pensions to the employees of another entity or entities and either of the following conditions exists:</p> <ol style="list-style-type: none"> 1. The amount of contributions for which the non-employer entity legally is responsible is <i>not</i> dependent upon one or more events or circumstances unrelated to the pensions. 2. The non-employer entity is the only entity with a legal obligation to make contributions directly to a pension plan.
Termination Benefits:	Inducements offered by employers to active employees to hasten the termination of services, or payments made in consequence of the early termination of services. Termination benefits include early-retirement incentives, severance benefits, and other termination-related benefits.
Total Pension Liability (TPL):	The portion of the actuarial present value of projected benefit payments that is attributed to past periods of employee service in conformity with the requirements of Statement.

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