BURLINGTON EMPLOYEES' RETIREMENT SYSTEM

ACTUARIAL VALUATION REPORT

JUNE 30, 2022

hooker & holcombe

Table of Contents

Report Prepared By:

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Executive Summary

	June 30, 2022			June 30, 2021		
	Class A	Class B	Total	Class A	Class B	Total
Number of members						
Active employees	150	726	876	164	718	882
Terminated vested members	36	384	420	27	350	377
Vested in employee contributions only	26	321	347	24	255	279
Retired, disabled and beneficiaries	213	625	838	206	608	814
Total	425	2,056	2,481	421	1,931	2,352
Covered employee payroll	10,181,529	41,180,282	51,361,810	10,983,976	40,650,238	51,634,214
Average plan salary	67,877	56,722	58,632	66,975	56,616	58,542
Actuarial present value of future benefits	181,435,446	194,585,060	376,020,507	175,631,548	186,334,932	361,966,480
Actuarial accrued liability	153,271,248	172,546,768	325,818,016	146,637,414	164,141,496	310,778,910
Plan assets						
Market value of assets	92,241,807	117,182,995	209,424,802	108,154,375	140,780,547	248,934,922
Actuarial value of assets	100,004,390	127,044,496	227,048,886	95,312,732	124,065,055	219,377,787
Unfunded accrued liability	53,266,858	45,502,272	98,769,130	51,324,682	40,076,441	91,401,123
Funded ratio	65.2%	73.6%	69.7%	65.0%	75.6%	70.6%
Actuarially determined employer contribution (ADEC)						
Fiscal year ending	2024	2024	2024	2023	2023	2023
ADEC	7,045,557	6,011,496	13,057,053	6,877,748	5,601,701	12,479,449

Valuation Results and Highlights

Purpose of the Valuation

The purpose of the valuation is to develop the Actuarially Determined Employer Contribution (ADEC).

The ultimate cost of a pension plan is based primarily on the level of benefits promised by the plan. The pension fund's investment earnings serve to reduce the cost of plan benefits and expenses. Thus,

Ultimate cost = Benefits Paid + Expenses Incurred – Investment Return – Employee Contributions

The actuarial cost method distributes this ultimate cost over the working lifetime of current plan participants. By means of this budgeting process, costs are allocated to both past and future years, and a cost is assigned to the current year. The current year's allocated cost, or normal cost, is the building block upon which the actuarially determined employer contribution is developed. The June 30, 2022 valuation produces the contribution for the fiscal year ending 2024.

Information Available in the Valuation Report

The Executive Summary is intended to emphasize the notable results of the valuation from the perspective of the Plan Sponsor. Supporting technical detail is documented in Results of the Valuation, Supporting Exhibits and Description of Actuarial Methods and Assumptions. A concise summary of the principal provisions of the Plan is outlined in Summary of Plan Provisions.

Changes Reflected in the Valuation

The investment rate of return assumption was updated, which increased the unfunded accrued liability and ADEC by $3,384,000 and $356,000, respectively. In addition, a plan change related to the Fire group was reflected, which increased the unfunded accrued liability and ADEC by $63,000 and $9,000, respectively.

Cash Contribution for Fiscal Year Ending 2024

The City cost is:	2024 Fiscal Year
Class A	$7,045,557
Class B	6,011,496
Total	$13,057,053

Liability Experience During Period Under Review

The plan experienced a net actuarial loss on liabilities of approximately $3,341,000 since the prior valuation. The loss was mainly due to losses from actual turnover and retirement patterns, as well as salary increases that were higher than expected.

Asset Experience During Period Under Review

The plan's assets provided the following rates of return during the past fiscal year:

	2022 Fiscal Year
Market Value Basis	-13.3%
Actuarial Value Basis	6.7%

The Actuarial Value of assets, rather than the Market Value, is used to determine plan contributions. The Actuarial Value spreads the asset volatility over 5 years, thereby smoothing out fluctuations that are inherent in the Market Value.

Assessment and Measurement of Risks

Financial Significance of Plan

It is important to understand the size of the pension plan compared to the size of the sponsor of that plan. Additional pension contributions may be required at inopportune times for the plan sponsor. In general, a plan sponsor with assets or revenue that are much larger than the liabilities in its pension plans will be better able to withstand increases in required pension contributions.

Plan Maturity Measurements

	June 30, 2022	June 30, 2021
Actuarial accrued liability for members currently in pay status as a percentage of the total actuarial accrued liability	62.3%	60.6%
• A lower percentage results in greater volatility as the investment return assumption changes.		
• A higher percentage results in greater demand on cash due to a proportionately higher percentage of benefits being in pay status.		

	June 30, 2022
Duration of benefit payments using an investment rate of return of 7.10%	13.1 years
• A higher duration will occur if the plan's percentage of members in pay status decreases. A plan with a higher duration will have a liability that is more sensitive to changes in the investment return assumption.	

	June 30, 2022	June 30, 2021
Ratio of market value of assets to covered payroll	4.1	4.8
• A higher ratio is more typical of relatively mature plans with a larger percentage of inactive members and may cause more potential contribution volatility as pension fund assets fluctuate.		

Risks to Assess

Estimated Impact of a 5% Reduction in Market Value of Assets

	Fiscal Year Ending 2024
Increase in actuarially determined employer contribution (ADEC)	182,570

• Plans would generally be subject to a larger amortization payment if the market value of assets were 5% smaller. As a result, the ADEC would generally be higher for up to 30 years.

Due to the asset smoothing method, the ADEC will additionally increase by the same amount in each of the next few years. Each of these additional contributions will continue for up to 30 years.

Estimated Impact of a 1-Year Increase in Life Expectancies

	Fiscal Year Ending 2024
Increase in actuarially determined employer contribution (ADEC)	626,969

• If members live longer than expected, it generally results in larger benefits and/or additional benefit payments made. As a result, the ADEC would generally be higher for up to 30 years.

Historical Results

Valuation Year Beginning	Investment Return Assumption	Annual Effective Rate of Return on Market Value of Assets	Market Value of Assets as a % of Actuarial Accrued Liability	Benefit Payments as a % of Market Value of Assets
2022	7.10%	N/A	64.3%	N/A
2021	7.20%	-13.3%	80.1%	8.3%
2020	7.30%	31.1%	66.4%	9.5%
2019	7.40%	2.3%	70.0%	8.9%
2018	7.50%	5.1%	71.4%	8.8%
2017	8.00%	9.6%	69.5%	8.9%
2016	8.00%	14.1%	63.8%	9.4%
2015	8.00%	-1.3%	69.3%	8.8%

Certification

This report presents the results of the June 30, 2022 Actuarial Valuation for Burlington Employees' Retirement System (the Plan) for the purpose of estimating the funded status of the Plan and determining the Actuarially Determined Employer Contribution (ADEC) for the fiscal year ending June 30, 2024. This report may not be appropriate for any other purpose.

The valuation has been performed in accordance with generally accepted actuarial principles and practices. It is intended to comply with all applicable Actuarial Standards of Practice.

As required under Part II, Section 24-61 of the Burlington Code of Ordinances, experience studies are performed at least one in every five-year period. The assumptions in this report were based on an experience study covering the period July 1, 2012 to June 30, 2017.

In our opinion, the actuarial assumptions used in this report are reasonably related to the experience of the Plan and to reasonable long-term expectations.

In preparing this valuation, I have relied on employee data provided by the Plan Sponsor, and on asset and contribution information provided by the Trustee. I have audited neither the employee data nor the financial information, although I have reviewed them for reasonableness.

The results in this valuation report are based on the Plan as summarized in the *Summary of Plan Provisions* section of this report and the actuarial assumptions and methods detailed in the *Description of Actuarial Methods and Assumptions* section of this report.

Future actuarial measurements may differ significantly from the current measurements presented in this report due to factors such as, but not limited to, the following: plan experience differing from that anticipated by the economic or demographic assumptions; changes in economic or demographic assumptions; increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the Plan’s funded status); and changes in plan provisions or applicable law. Due to the limited scope of this report, an analysis of the potential range of such future measurements has not been performed.

I have no relationship with the employer or the Plan that would impair, or appear to impair, my objectivity in performing the work presented in this report. I am a member of the American Academy of Actuaries and meet its Qualification Standards to render the actuarial opinion contained herein.

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Enrolled Actuary 20-05506

Robert P. Lessard
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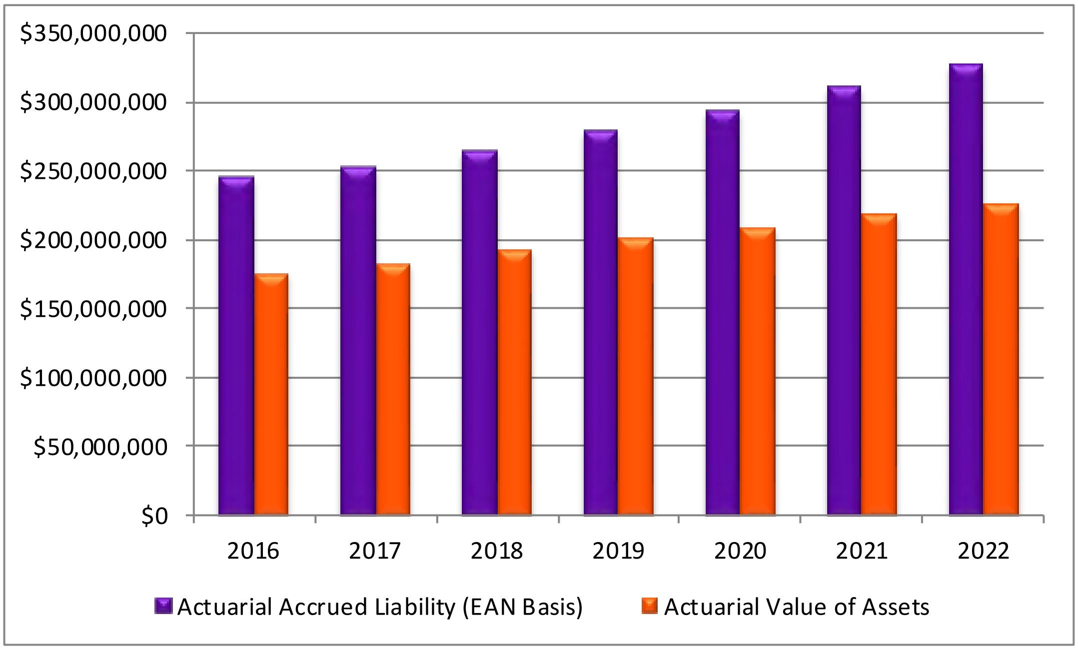
Enrolled Actuary 20-08801

March 2, 2023

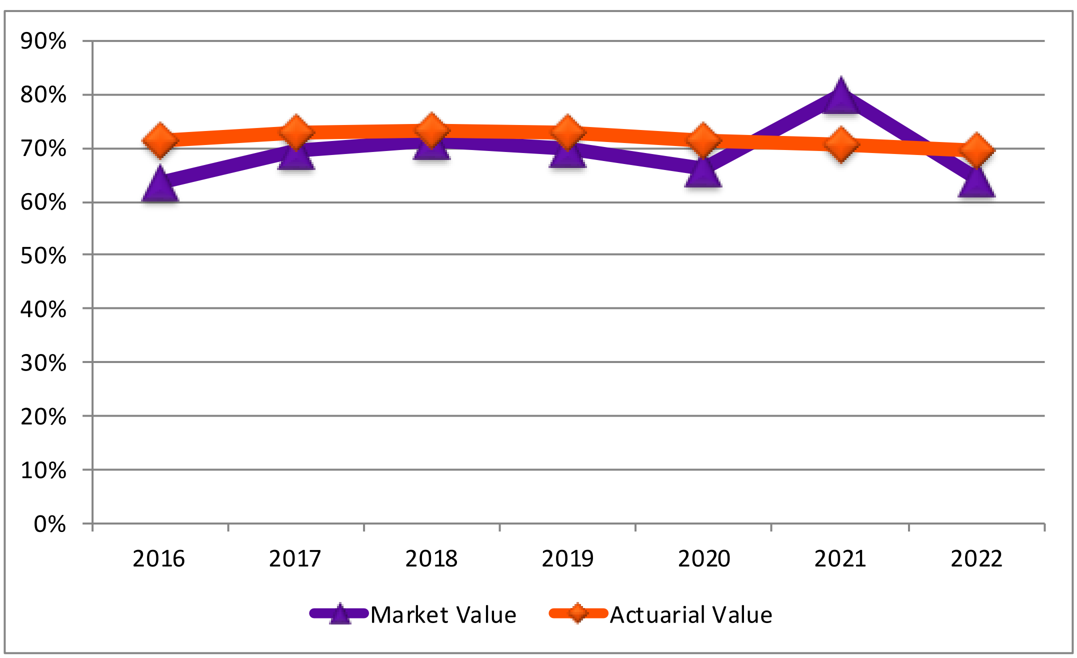
Development of Unfunded Accrued Liability and Funded Ratio

	June 30, 2022			June 30, 2021		
	Class A	**Class B**	**Total**	**Class A**	**Class B**	**Total**
Actuarial accrued liability for inactive members						
Retired, disabled and beneficiaries	$105,400,394	$97,587,155	$202,987,549	$96,292,776	$92,060,864	$188,353,641
Terminated vested members	3,459,222	12,695,920	16,155,142	2,938,814	9,935,872	12,874,685
Due refund of employee contributions only	310,147	1,167,726	1,477,872	363,418	1,086,066	1,449,484
Total	109,169,763	111,450,801	220,620,563	99,595,008	103,082,802	202,677,810
Actuarial accrued liability for active employees	44,101,485	61,095,967	105,197,453	47,042,406	61,058,694	108,101,100
Total actuarial accrued liability	153,271,248	172,546,768	325,818,016	146,637,414	164,141,496	310,778,910
Actuarial value of assets	100,004,390	127,044,496	227,048,886	95,312,732	124,065,055	219,377,787
Unfunded accrued liability	53,266,858	45,502,272	98,769,130	51,324,682	40,076,441	91,401,123
Funded ratio	65.2%	73.6%	69.7%	65.0%	75.6%	70.6%

Actuarial Accrued Liability vs. Actuarial Value of Assets



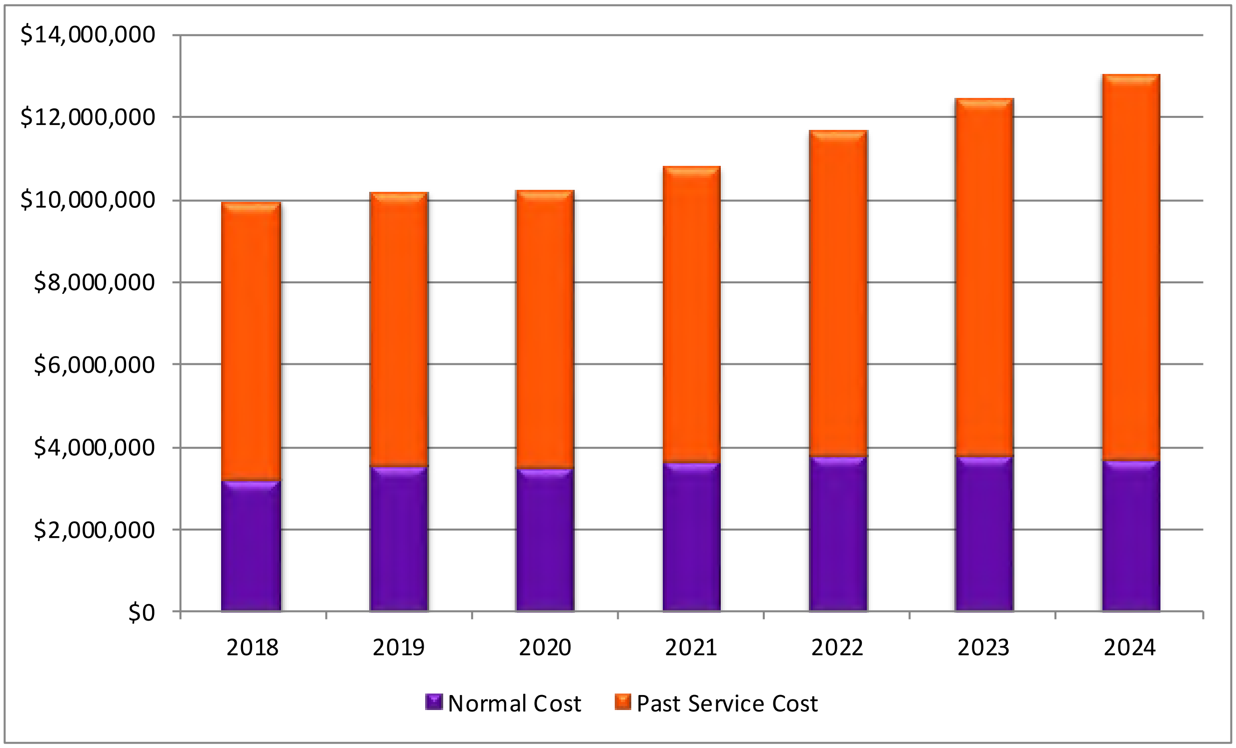
Funded Ratio



Determination of Normal Cost and Actuarially Determined Employer Contribution

	June 30, 2022		June 30, 2021	
	Cost	Percent of payroll	Cost	Percent of payroll
Gross normal cost	$6,545,615	11.8%	$6,776,297	12.6%
Estimated employee contributions	(2,980,079)	-5.4%	(3,102,941)	-5.8%
City's normal cost	3,565,536	6.4%	3,673,356	6.8%
Amortization of unfunded accrued liability	9,384,551	17.0%	8,695,892	16.2%
Contribution before adjustment as of the valuation date	12,950,087	23.4%	12,369,248	23.0%
Estimated valuation year payroll for actives not yet at 100% assumed retirement age	55,392,895		53,775,322	
Fiscal year ending	2024		2023	
Adjustment for interest and inflation	106,966		110,201	
Actuarially determined employer contribution	13,057,053		12,479,449	

Actuarially Determined Employer Contribution



Actuarially Determined Employer Contribution per Group

	Class A	Class B IBEW Local 300	Class B BED Non-Union	Class B School	Class B Other	Class B	Total
Gross normal cost	$3,205,293	$404,077	$368,529	$768,593	$1,799,123	$3,340,322	$6,545,615
Estimated employee contributions	(1,178,316)	(251,502)	(171,657)	(369,605)	(1,008,999)	(1,801,763)	(2,980,079)
City's normal cost	2,026,977	152,575	196,872	398,988	790,124	1,538,559	3,565,536
Actuarial accrued liability	153,271,248	29,867,569	23,482,460	24,266,612	94,930,127	172,546,768	325,818,016
Actuarial value of assets	100,004,390	21,991,199	17,289,905	17,867,269	69,896,123	127,044,496	227,048,886
Unfunded accrued liability	53,266,858	7,876,370	6,192,555	6,399,343	25,034,004	45,502,272	98,769,130
Amortization of unfunded accrued liability	4,957,771	766,269	602,455	622,573	2,435,483	4,426,780	9,384,551
Contribution before adjustment as of the valuation date	6,984,748	918,844	799,327	1,021,561	3,225,607	5,965,339	12,950,087
Estimated valuation year payroll for actives not yet at 100% assumed retirement age	10,711,970	6,526,013	4,488,957	8,914,734	24,751,221	44,680,925	55,392,895
City's normal cost as a percentage of payroll	18.9%	2.3%	4.4%	4.5%	3.2%	3.4%	6.4%
Contribution as a percentage of payroll	65.2%	14.1%	17.8%	11.5%	13.0%	13.4%	23.4%
Fiscal year ending June 30, 2024							
Adjustment for interest and inflation	60,809	4,577	5,906	11,970	23,704	46,157	106,966
Actuarially determined employer contribution	7,045,557	923,421	805,233	1,033,531	3,249,311	6,011,496	13,057,053

Determination of Actuarial Gain/Loss

The Actuarial Gain/Loss is the difference between the expected unfunded accrued liability and the actual unfunded accrued liability, without regard to any changes in actuarial methods, actuarial assumptions or plan provisions. This can also be referred to an Experience Gain/Loss, since it reflects the difference between what was expected and what was actually experienced.

Actuarial Gain / Loss		
Expected unfunded accrued liability June 30, 2022		
Expected unfunded accrued liability June 30, 2022		
Unfunded accrued liability June 30, 2021	$91,401,123	
Gross normal cost June 30, 2021	6,776,297	
City and employee contributions for 2021-2022	(14,778,997)	
Interest at 7.20% to June 30, 2022	6,550,349	
Expected unfunded accrued liability June 30, 2022	89,948,772	
Actuarial (gain) / loss June 30, 2022	5,373,676	
Actual unfunded accrued liability June 30, 2022, prior to plan provision, assumption and method changes		95,322,448
Sources of (gain) / loss		
Assets	2,033,000	
Salary increases	1,539,000	
Retiree mortality	(71,000)	
Turnover, disability and retirements	1,302,000	
New entrants	201,000	
Data adjustments	388,000	
COLA increases	38,000	
Other experience	(56,000)	
Total (gain) / loss (rounded to nearest $1,000)	5,374,000	
Assumption and method changes since prior valuation		3,383,942
Plan provision changes since prior valuation		62,740
Actual unfunded accrued liability June 30, 2022, after plan provision, assumption and method changes		98,769,130

Development of Asset Values

Summary of Fund Activity		
	Market Value	**Actuarial Value**
1. Beginning value of assets June 30, 2021		
Trust assets	$248,934,922	$219,377,787
2. Contributions		
City contributions during year	10,821,716	10,821,716
Employee contributions during year	3,957,281	3,957,281
Total for plan year	14,778,997	14,778,997
3. Disbursements		
Benefit payments during year	20,615,115	20,615,115
Administrative expenses during year	935,694	935,694
Other disbursements	50,100	50,100
Total for plan year	21,600,909	21,600,909
4. Net investment return		
Interest and dividends	19,633,697	N/A
Realized and unrealized gain / (loss)	(52,007,385)	N/A
Expected return	N/A	17,685,769
Recognized gain / (loss)	N/A	(3,192,758)
Required adjustment due to corridor	N/A	0
Reversal of prior year required adjustment	N/A	0
Investment-related expenses	(314,520)	N/A
Total for plan year	(32,688,208)	14,493,011
5. Ending value of assets June 30, 2022		
Trust assets: (1) + (2) - (3) + (4)	209,424,802	227,048,886
6. Approximate rate of return	-13.3%	6.7%

Relationship of Actuarial Value to Market Value

1. Market value 6/30/2022	$209,424,802
2. Gain / (loss) not recognized in actuarial value 6/30/2022	(17,624,084)
3. Preliminary actuarial value 6/30/2022: (1) - (2)	227,048,886
4. Preliminary actuarial value as a percentage of market value: (3) ÷ (1)	108.4%
5. Gain / (loss) recognized for corridor minimum / maximum	N/A
6. Actuarial value 6/30/2022 after corridor minimum / maximum: (3) + (5)	227,048,886
7. Actuarial value as a percentage of market value: (6) ÷ (1)	108.4%

Development of Market Value Gain / Loss for 2021-2022 Plan Year

1. Market value 6/30/2021	$248,934,922
2. City contributions	10,821,716
3. Employee contributions	3,957,281
4. Benefit payments and other disbursements	20,665,215
5. Administrative expenses	935,694
6. Expected return at 7.20%	17,685,769
7. Expected value 6/30/2022: (1) + (2) + (3) - (4) - (5) + (6)	259,798,779
8. Market value 6/30/2022	209,424,802
9. Market value gain / (loss) for 2021-2022 plan year: (8) - (7)	(50,373,977)

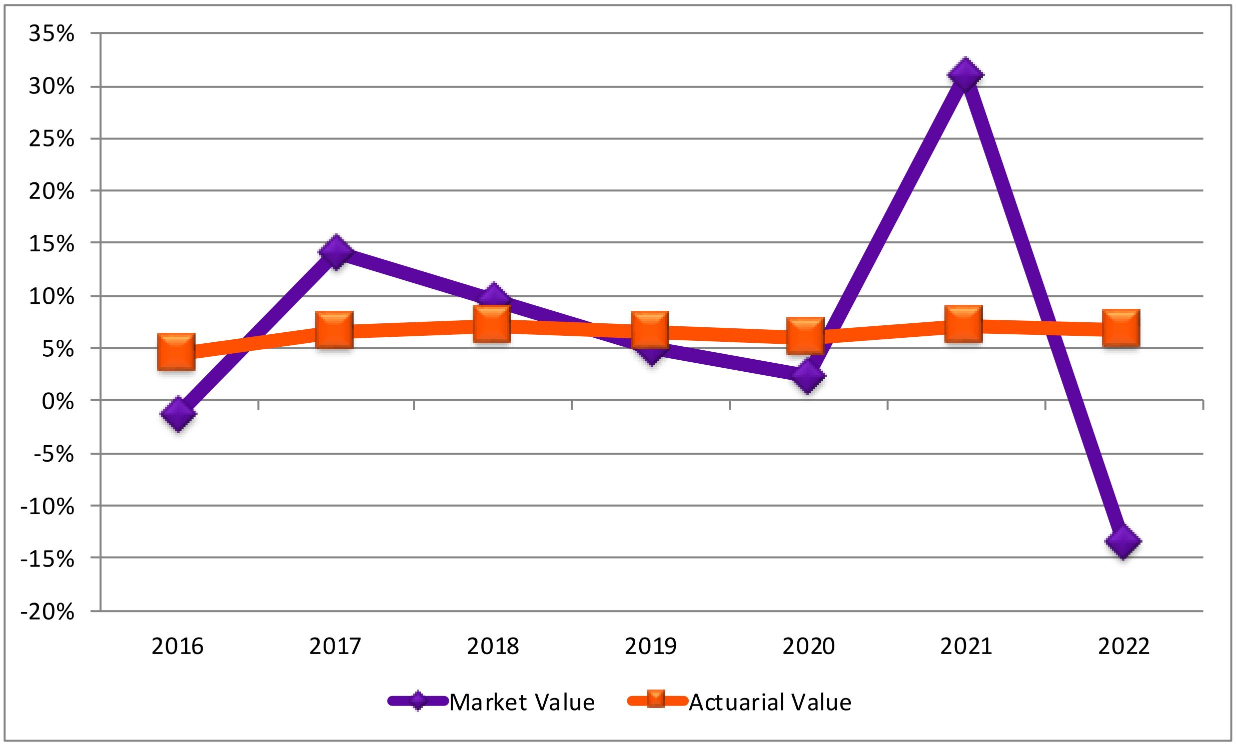
Recognition of Gain / Loss in Actuarial Value

Year	(a) Gain / (loss)	(b) Total recognized as of 6/30/2021	(c) Recognized in current year: 20% of (a)	(d) Total recognized as of 6/30/2022: (b) + (c)	(e) Not recognized as of 6/30/2022: (a) - (d)
2017-2018	$2,849,687	$2,279,752	$569,935	$2,849,687	$0
2018-2019	(4,474,973)	(2,684,982)	(894,995)	(3,579,977)	(894,996)
2019-2020	(9,744,015)	(3,897,608)	(1,948,803)	(5,846,411)	(3,897,604)
2020-2021	45,779,498	9,155,900	9,155,900	18,311,800	27,467,698
2021-2022	(50,373,977)	0	(10,074,795)	(10,074,795)	(40,299,182)
Total			(3,192,758)		(17,624,084)

Rate of Return on Market Value of Assets				
Period Ending	Average Annual Effective Rate of Return			
June 30	1 Year	3 Years	5 Years	10 Years
2013	6.5%	9.4%	4.5%	N/A
2014	15.0%	7.5%	12.3%	6.3%
2015	-1.7%	6.4%	8.2%	5.4%
2016	-1.3%	3.7%	3.8%	4.2%
2017	14.1%	3.4%	6.3%	3.9%
2018	9.6%	7.3%	6.9%	5.7%
2019	5.1%	9.5%	5.0%	8.6%
2020	2.3%	5.6%	5.8%	7.0%
2021	31.1%	12.1%	12.0%	7.8%
2022	-13.3%	5.1%	6.0%	6.1%

Rate of Return on Actuarial Value of Assets				
Period Ending	Average Annual Effective Rate of Return			
June 30	1 Year	3 Years	5 Years	10 Years
2013	6.2%	4.3%	3.0%	N/A
2014	11.0%	6.5%	5.0%	4.8%
2015	7.8%	8.3%	6.3%	5.6%
2016	4.4%	7.7%	6.3%	5.6%
2017	6.5%	6.2%	7.2%	5.2%
2018	7.1%	6.0%	7.3%	5.1%
2019	6.6%	6.7%	6.5%	5.7%
2020	5.9%	6.6%	6.1%	6.2%
2021	7.2%	6.6%	6.7%	6.5%
2022	6.7%	6.6%	6.7%	6.9%

Actual Rate of Return on Assets



Target Allocation and Expected Rate of Return
June 30, 2022

Asset Class	Target Allocation	Long-Term Expected Real Rate of Return*	Weighting
Core Fixed Income	17.50%	3.90%	0.68%
US Bonds - Dynamic	7.50%	3.90%	0.29%
U.S. Large Cap Equity	31.00%	7.30%	2.27%
U.S. Small Cap Equity	9.00%	7.60%	0.68%
International Developed Equity	20.50%	10.10%	2.08%
International Emerging Markets Equity	7.00%	11.40%	0.81%
Private Equity	0.50%	10.40%	0.05%
Real Estate	6.00%	7.60%	0.46%
Timberland	1.00%	7.60%	0.08%
	100.00%		7.40%
Interaction Effect			0.60%
Long-Term Expected Nominal Return			8.00%

**Long-Term Real Returns are provided by Fiducient Advisors. The supporting information is contained in the September 2, 2022 letter regarding Fiducient Advisors' Capital Market Assumptions. The returns are geometric means.*

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 are developed. Best estimates of the real rates of return for each major asset class are included in the pension plan's target asset allocation.

The information above is based on geometric means and does not reflect additional returns through investment selection, asset allocation and rebalancing. An expected rate of return of 7.10% was used.

Amortization of Unfunded Liability

Schedule of Amortization Bases - Total					
	Date established	**Original amount**	**Amortization installment**	**Years remaining**	**Present value of remaining installments as of June 30, 2022**
Initial base	June 30, 2004	$10,020,499	$854,407	12	$7,100,533
2005 base	June 30, 2005	13,325,808	1,211,331	13	10,530,420
2006 base	June 30, 2006	7,669,440	691,651	14	6,259,898
2007 base	June 30, 2007	(2,444,427)	(219,625)	15	(2,061,044)
2008 base	June 30, 2008	(2,492,739)	(223,443)	16	(2,166,497)
2009 base	June 30, 2009	12,784,050	1,143,348	17	11,418,496
2010 base	June 30, 2010	8,547,645	762,802	18	7,825,230
2011 base	June 30, 2011	6,255,018	548,049	19	5,761,181
2012 base	June 30, 2012	3,602,242	320,148	20	3,441,272
2013 base	June 30, 2013	5,490,961	478,190	21	5,245,800
2014 base	June 30, 2014	1,295,623	114,710	22	1,282,066
2015 base	June 30, 2015	(2,956,424)	(261,281)	23	(2,970,597)
2016 base	June 30, 2016	10,621,866	937,112	24	10,823,035
2017 base	June 30, 2017	(1,422,825)	(125,320)	25	(1,468,428)
2018 base	June 30, 2018	3,786,540	331,710	26	3,938,840
2019 base	June 30, 2019	5,678,255	496,680	27	5,970,518
2020 base	June 30, 2020	8,781,940	767,154	28	9,326,799
2021 base	June 30, 2021	9,176,618	800,734	29	9,837,334
2022 base	June 30, 2022	8,674,274	756,194	30	8,674,274
Total			9,384,551		98,769,130

Schedule of Amortization Bases - Class A					
	Date established	**Original amount**	**Amortization installment**	**Years remaining**	**Present value of remaining installments as of June 30, 2022**
Initial base	June 30, 2004	$3,698,048	$314,510	12	$2,613,726
2005 base	June 30, 2005	6,655,535	600,937	13	5,224,103
2006 base	June 30, 2006	2,588,959	233,176	14	2,110,392
2007 base	June 30, 2007	(1,715,997)	(154,177)	15	(1,446,860)
2008 base	June 30, 2008	713,490	63,955	16	620,107
2009 base	June 30, 2009	3,308,275	295,877	17	2,954,894
2010 base	June 30, 2010	3,969,991	354,287	18	3,634,463
2011 base	June 30, 2011	3,564,353	313,224	19	3,292,658
2012 base	June 30, 2012	2,191,929	194,807	20	2,093,979
2013 base	June 30, 2013	2,337,776	198,496	21	2,177,521
2014 base	June 30, 2014	2,892,368	256,080	22	2,862,101
2015 base	June 30, 2015	(50,538)	(4,466)	23	(50,779)
2016 base	June 30, 2016	4,439,699	391,692	24	4,523,784
2017 base	June 30, 2017	2,901,660	255,574	25	2,994,664
2018 base	June 30, 2018	6,440,134	564,171	26	6,699,165
2019 base	June 30, 2019	2,016,721	176,404	27	2,120,522
2020 base	June 30, 2020	5,074,681	443,303	28	5,389,530
2021 base	June 30, 2021	2,492,728	217,511	29	2,672,204
2022 base	June 30, 2022	2,780,684	242,410	30	2,780,684
Total			4,957,771		53,266,858

Schedule of Amortization Bases - Class B

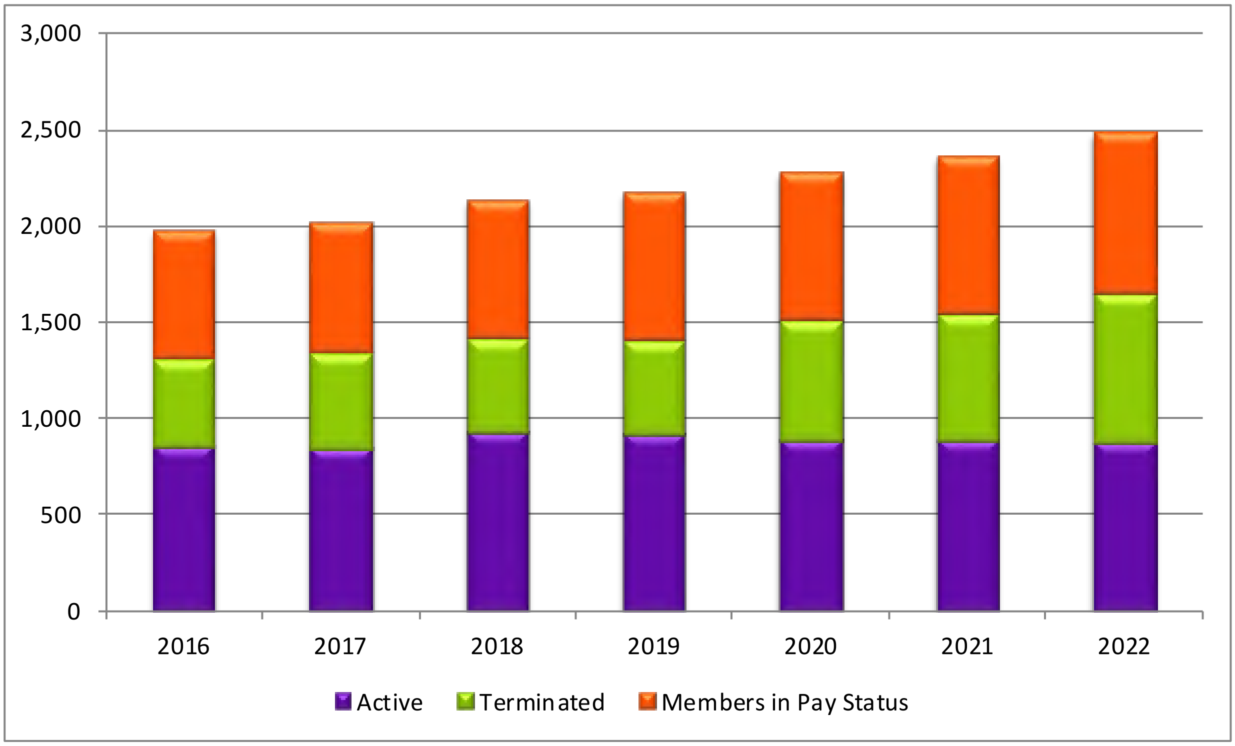
	Date established	Original amount	Amortization installment	Years remaining	Present value of remaining installments as of June 30, 2022
Initial base	June 30, 2004	$6,322,451	$539,897	12	$4,486,807
2005 base	June 30, 2005	6,670,273	610,394	13	5,306,317
2006 base	June 30, 2006	5,080,481	458,475	14	4,149,506
2007 base	June 30, 2007	(728,430)	(65,448)	15	(614,184)
2008 base	June 30, 2008	(3,206,229)	(287,398)	16	(2,786,604)
2009 base	June 30, 2009	9,475,775	847,471	17	8,463,602
2010 base	June 30, 2010	4,577,654	408,515	18	4,190,767
2011 base	June 30, 2011	2,690,665	234,825	19	2,468,523
2012 base	June 30, 2012	1,410,313	125,341	20	1,347,293
2013 base	June 30, 2013	3,153,185	279,694	21	3,068,279
2014 base	June 30, 2014	(1,596,745)	(141,370)	22	(1,580,035)
2015 base	June 30, 2015	(2,905,886)	(256,815)	23	(2,919,818)
2016 base	June 30, 2016	6,182,167	545,420	24	6,299,251
2017 base	June 30, 2017	(4,324,485)	(380,894)	25	(4,463,092)
2018 base	June 30, 2018	(2,653,594)	(232,461)	26	(2,760,325)
2019 base	June 30, 2019	3,661,534	320,276	27	3,849,996
2020 base	June 30, 2020	3,707,259	323,851	28	3,937,269
2021 base	June 30, 2021	6,683,890	583,223	29	7,165,130
2022 base	June 30, 2022	5,893,590	513,784	30	5,893,590
Total			4,426,780		45,502,272

Member Data

The data reported by the Plan Sponsor for this valuation includes 876 active employees who met the Plan's minimum age and service requirements as of June 30, 2022.

Member Data					
	Active	Terminated vested	Due refund of contributions	Members in pay status	Total
Total members June 30, 2021	882	377	279	814	2,352
Adjustments	-1	+20	-13	+3	+9
Retirements	-26	-12	N/A	+38	0
Disabilities	-2	N/A	N/A	+2	0
Terminations					
Vested	-46	+46	N/A	N/A	0
Lump sum payments	-22	-5	-15	N/A	-42
Due contributions only	-64	N/A	+64	N/A	0
Deaths					
With death benefit	-2	-2	-1	-3	-8
Without death benefit	0	-1	0	-20	-21
Transfers	0	0	0	N/A	0
Rehires	+10	-3	-7	N/A	0
New beneficiaries	N/A	N/A	N/A	+4	+4
New entrants	+147	N/A	+40	N/A	+187
Total members June 30, 2022	876	420	347	838	2,481

Member Counts by Status



Member Data				
	Active	**Terminated vested**	**Due refund of contributions**	**Members in pay status**
Average age				
June 30, 2021	44.8	53.9	38.0	69.4
June 30, 2022	43.9	53.3	38.4	69.7
Average service				
June 30, 2021	10.2	N/A	N/A	N/A
June 30, 2022	9.9	N/A	N/A	N/A
Covered employee payroll				
June 30, 2021	$51,634,214	N/A	N/A	N/A
June 30, 2022	51,361,810	N/A	N/A	N/A
Total annual benefits				
June 30, 2021	N/A	$2,255,208	N/A	$18,601,968
June 30, 2022	N/A	2,774,847	N/A	19,822,002

Member Data - Class A					
	Active	Terminated vested	Due refund of contributions	Members in pay status	Total
Total members June 30, 2021	164	27	24	206	421
Adjustments	-1	+2	-2	0	-1
Retirements	-8	-1	N/A	+9	0
Disabilities	-1	N/A	N/A	+1	0
Terminations					
Vested	-11	+11	N/A	N/A	0
Lump sum payments	-4	-3	-3	N/A	-10
Due contributions only	-5	N/A	+5	N/A	0
Deaths					
With death benefit	0	0	0	-1	-1
Without death benefit	0	0	0	-3	-3
Transfers	0	0	0	N/A	0
Rehires	0	0	0	N/A	0
New beneficiaries	N/A	N/A	N/A	+1	+1
New entrants	+16	N/A	+2	N/A	+18
Total members June 30, 2022	150	36	26	213	425

Member Data - Class B					
	Active	**Terminated vested**	**Due refund of contributions**	**Members in pay status**	**Total**
Total members June 30, 2021	718	350	255	608	1,931
Adjustments	0	+18	-11	+3	+10
Retirements	-18	-11	N/A	+29	0
Disabilities	-1	N/A	N/A	+1	0
Terminations					
Vested	-35	+35	N/A	N/A	0
Lump sum payments	-18	-2	-12	N/A	-32
Due contributions only	-59	N/A	+59	N/A	0
Deaths					
With death benefit	-2	-2	-1	-2	-7
Without death benefit	0	-1	0	-17	-18
Transfers	0	0	0	N/A	0
Rehires	+10	-3	-7	N/A	0
New beneficiaries	N/A	N/A	N/A	+3	+3
New entrants	+131	N/A	+38	N/A	+169
Total members June 30, 2022	726	384	321	625	2,056

Description of Actuarial Methods

Asset Valuation Method

The Actuarial Value of assets used in the development of plan contributions phases in the recognition of differences between the actual return on Market Value and expected return on Market Value over a 5-year period at 20% per year.

Actuarial Cost Method

Changes in Actuarial Cost Method: None.

Description of Current Actuarial Cost Method: Entry Age Normal (level percentage of salary)

Normal Cost: Under this method, the total normal cost is the sum of amounts necessary to fund each active member's normal retirement benefit if paid annually from entry age to assumed retirement age. Entry age is the age at which the employee would have been first eligible for the plan, if it had always been in effect. The normal cost for each participant is expected to remain a level percentage of the employee's salary. The normal cost for the plan is the difference between the total normal cost for the year and the anticipated member contributions for that year.

Past Service Liability: The present value of future benefits that relates to service before the valuation date is the total past service liability. The unfunded past service liability is the difference between the total past service liability and any assets (including accumulated member contributions). Unfunded accrued liabilities as of June 30, 2004 were amortized over a closed 30-year period. Future changes in the unfunded accrued liability will be amortized separately, assuming a new 30-year amortization each valuation.

Experience Gains and Losses: All experience gains and losses (the financial effect of the difference between the actual experience during the prior period and the result expected by the actuarial assumptions for that prior period) appear directly in the past service liability and are amortized at the same rate the plan is amortizing the remaining unfunded past service liability.

Description of Actuarial Assumptions

Changes in Actuarial Assumptions

The valuation reflects changes in the actuarial assumptions listed below. (The assumptions used before and after these changes are more fully described in the next section.)

- Investment rate of return

The assumptions indicated were changed to better reflect the Enrolled Actuary's current best estimate of anticipated experience of the plan.

Investment rate of return (net of investment-related and administrative expenses)

7.10%. (Prior: 7.20%)

Rate of compensation increase (including inflation)

Class A

Completed Years of Service	Rate
<1	10.0%
1	8.5%
2	7.3%
3	6.3%
4	5.9%
5	5.6%
6	5.4%
7	5.2%
8	5.0%
9	4.8%
10	4.7%
11	4.6%
12	4.5%
13	4.4%
14	4.3%
15	4.2%
16	4.0%
17	3.8%
18	3.7%
19	3.6%
20+	3.5%

Class B

Completed Years of Service	Rate
<1	6.6%
1	6.0%
2	5.5%
3	5.1%
4	4.9%
5	4.7%
6	4.5%
7	4.4%
8	4.3%
9	4.3%
10	4.2%
11	4.2%
12	4.1%
13	4.0%
14	3.9%
15	3.8%
16	3.8%
17	3.8%
18	3.7%
19	3.6%
20+	3.5%

The actuarial assumption in regards to rate of compensation increases shown above are based on the results of an actuarial experience study for the period July 1, 2012 through June 30, 2017.

Inflation

2.60%.

This assumption is consistent with the Social Security Administration's best estimate of the ultimate long-term (75-year horizon) annual percentage increase in CPI, as published in the 2018 OASDI Trustees Report.

Mortality

Class A (Non-Disabled): RP-2014 Adjusted to 2006 Total Dataset Mortality Table, projected to the valuation date with Scale MP-2021.

Class B (Non-Disabled): RP-2014 Adjusted to 2006 Total Dataset Mortality Table, projected to the valuation date with Scale MP-2021, set forward 2 years.

Class A and B (Disabilities): RP-2014 Adjusted to 2006 Disabled Mortality Table, projected to the valuation date with Scale MP-2021.

Mortality Improvement

Projected to date of decrement using Scale MP-2021 (generational).

We have selected this mortality assumption because it is based on a recently published pension mortality study released by the Society of Actuaries.

Retirement age

Class A

Completed Years of Service	Rate
<15	0%
15-18	5%
19	15%
20-23	25%
24	30%
25	75%
26-29	50%
30-34	75%
35+	100%

Compulsory retirement is assumed at age 60.

Retirement age (continued)

Class B

Age	Rate
55-59	5.0%
60	7.5%
61	12.5%
62	18.0%
63	22.5%
64-65	25.0%
66-69	30.0%
70-74	50.0%
75+	100.0%

Termination prior to retirement

Class A

Completed Years of Service	Rates
<1	8.0%
1	7.0%
2-6	6.0%
7	5.0%
8	4.5%
9	4.0%
10+	0.0%

Class B: 100% of the Vaughn Select & Ultimate Withdrawal Table for service prior to 3 years, and 130% of the Vaughn Select & Ultimate Withdrawal Table thereafter.

Sample rates

	Completed Years of Service			
Age	0	1	2	3+
20	29.8%	25.0%	21.0%	24.18%
25	27.8%	22.5%	18.5%	17.68%
30	25.8%	20.0%	16.0%	13.13%
35	23.8%	17.8%	13.8%	10.27%
40	21.8%	15.8%	11.8%	8.45%
45	19.8%	14.1%	10.1%	7.15%
50	17.8%	12.6%	8.6%	5.85%
55	0.0%	0.0%	0.0%	0.00%

Disability

Class A: 1985 Pension Disability Study Class 2 Table for Males and Females.

Class B: 1985 Pension Disability Study Class 1 Table for Males and Females.

The actuarial assumptions in regards to rates of decrement shown above are based on the results of an actuarial experience study for the period July 1, 2012 through June 30, 2017.

Administrative expenses

Currently, there is no expense load assumed for administrative expenses.

Cost of living increases

2.60%.

Accrual rate election

Class A: 85% of retiring members are assumed to elect the no COLA accrual rate and 15% of retiring members are assumed to elect the full COLA accrual rate.

Class B: 75% of retiring members are assumed to elect the no COLA accrual rate and 25% of retiring members are assumed to elect the full COLA accrual rate.

Payroll growth

3.00% per year.

Percent of active employees married

80%.

Spouse’s age

Husbands are assumed to be 3 years older than wives.

The assumption changes increased liabilities by about 1.0%.

Summary of Plan Provisions

This exhibit summarizes the major provisions of the Plan. It is not intended to be, nor should it be interpreted as a complete statement of all plan provisions. To the extent that this summary does not accurately reflect the plan provisions, then the results of this valuation may not be accurate.

Plan identification

Single-employer pension plan.

Effective date

July 1, 1954.

Average Final Compensation (AFC)

For Class A Police non-union employees, Class A Police employees hired after January 10, 2011, Class A Fire employees hired after October 7, 2011 Class B AFSCME Local 1343 employees hired after June 7, 2011, Class B IBEW Local 300 employees hired after October 30, 2012 or any employees hired on or after January 1, 2018, it is the average earnable compensation during the highest 5 non-overlapping 12-month periods. For all others, it is the average earnable compensation during the highest 3 non-overlapping 12-month periods.

Membership eligibility

Regular employees of the City of Burlington excluding elective officers other than the mayor and excluding teachers other than certain teachers employed prior to July 1, 1947.

Membership classification

Class A

Members of the Fire and Police Departments not including clerical employees.

Class B

All other members.

Service retirement

Eligibility

Class A

For Police employees hired before July 1, 2006, age 42 and 5 years of creditable service. For Police employees hired after January 10, 2011, age 40 and 20 years of creditable service. For other Police Union employees, age 45 and 5 years of creditable service. For Fire employees hired after January 10, 2011, age 45 and 20 years of creditable service. For Fire Union employees hired on or before January 10, 2011, age 45 and 5 years of creditable service. For all others, age 42 and 5 years of creditable service. Compulsory at age 60.

Class B

Age 55 and 5 years of creditable service.

Service retirement (continued)

Amount of Benefit

Class A

For Fire employees hired before January 1, 2007 and Police employees hired before July 1, 2006, 2.75% of AFC times creditable service not in excess of 25 years plus 0.50% of AFC times creditable service between 25 and 35 years. For Police employees hired after January 10, 2011, 2.50% of AFC times creditable service not in excess of 20 years plus 5.00% of AFC times creditable service between 20 and 25 years. For Fire employees hired after January 10, 2011, 3.00% of AFC times creditable service not in excess of 25 years plus 0.50% of AFC times creditable service between 25 and 35 years. For all others, 2.65% of AFC times creditable service not in excess of 25 years plus 0.50% of AFC times creditable service between 25 and 35 years. Benefit increased by Cost of Living Adjustment detailed below.

In lieu of this benefit, at the time of retirement, a member may choose either (i) an accrual rate of 3.25% for the first 25 years of creditable service, plus an accrual of 0.50% for creditable service between 25 and 35 years, and a Cost of Living Adjustment equal to one half of the Cost of Living Adjustment detailed below, or (ii) an accrual rate of 3.80% for all years of service prior to June 30, 2006 for the first 25 years, an accrual rate of 3.60% for all years of service commencing July 1, 2006 for the first 25 years, plus an accrual rate of 0.50% for creditable service between 25 and 35 years, and no Cost of Living Adjustment.

A Fire employee hired on or after January 1, 2007 or a Police employee hired on or after July 1, 2006 may only select a benefit with a full Cost of Living Adjustment. Any Fire employee hired after October 5, 2015 cannot receive a pension that exceeds 90% of the employee’s average final compensation.

For Police employees hired after January 10, 2011, the above benefits based on AFC and creditable service at retirement are reduced actuarially for the period of time by which retirement precedes age 50.

For all other Police employees, prior to age 55, the above benefit based on AFC and creditable service at retirement is reduced actuarially for the period of time by which retirement precedes the earlier of 25 years of creditable service and age 55. For employees who terminate with 20 to 25 years of creditable service the above benefit based on AFC and creditable service at retirement is reduced by 1.82% for each year that creditable service is less than 25 years.

For Fire employees hired on or after January 10, 2011, who are at least age 45 with 20 years of creditable service, the normal retirement benefit is reduced actuarially for the period of time by which retirement precedes age 50. For employees who terminate with 20 to 25 years of creditable service who retire at age 50 or later, the above benefit based on AFC and creditable service at retirement is reduced by 1.82% for each year that creditable service is less than 25 years. Employees that retiree at age 50 with at least 25 years of creditable service receive an unreduced benefit.

For Fire employees hired on or after January 1, 2007 but before January 10, 2011, the normal retirement benefit is reduced actuarially for the period to time by which retirement precedes age 55. For employees who terminate with 20 to 25 years of creditable service and have attained age 48, the above benefit based on AFC and creditable service at retirement is reduced by 1.82% for each year that creditable service is less than 25 years. Employees that retire at age 50 with at least 20 years of creditable service or at age 45 with at least 25 years of creditable service receive an unreduced benefit.

For Fire employees hired before January 1, 2007, the normal retirement benefit is reduced actuarially for the period of time by which retirement precedes the earlier of age 55 or 25 years of creditable service. For employees who terminate with 20 to 25 years of creditable service, the above benefit based on AFC and creditable service at retirement is reduced by 1.82% for each year that creditable service is less than 25 years. Employees that retire at age 45 with at least 25 years of creditable service receive an unreduced benefit.

Service retirement (continued)

Class B

For employees hired prior to July 1, 2006 (on or before May 4, 2008 for IBEW): Age 65 and older, the greater of (i) 1.60% of AFC (at age 65) times creditable service not in excess of 25 years plus 0.50% of AFC (at age 65) times creditable service in excess of 25 years or (ii) the actuarial equivalent of the benefit determined at age 65. This benefit will be increased by the Cost of Living Adjustment detailed below.

In lieu of this benefit, at the time of retirement, an IBEW member may choose (i) an accrual rate of 1.90% for all years of service prior on or before May 4, 2008 and an accrual rate of 1.80% for all years of service after May 4, 2008, and a Cost of Living Adjustment equal to one-half of the Cost of Living Adjustment detailed below, or (ii) an accrual rate of 2.20% for all years of service on or before May 4, 2008 and an accrual rate of 2.00% for all years of service after May 4, 2008, and no Cost of Living Adjustment.

In lieu of this benefit, at the time of retirement, a member not in IBEW may choose (i) an accrual rate of 1.90% for all years of service prior to June 30, 2006 for the first 25 years, an accrual rate of 1.80% for all years of service on or after July 1, 2006 for the first 25 years, plus an accrual of 0.50% for creditable service in excess of 25 years, and a Cost of Living Adjustment equal to one-half of the Cost of Living Adjustment detailed below, or (ii) an accrual rate of 2.20% for all years of service prior to June 30, 2006 (on or before May 4, 2008 for IBEW) for the first 25 years, an accrual rate of 2.00% for all years of service on or after July 1, 2006 for the first 25 years, plus an accrual of 0.50% for creditable service in excess of 25 years, and no Cost of Living Adjustment.

For employees hired on or after July 1, 2006 (after May 4, 2008 for IBEW): Age 65 and older, the greater of (i) 1.40% of AFC (at age 65) times creditable service not in excess of 25 years plus 0.50% of AFC (at age 65) times creditable service in excess of 25 years or (ii) the actuarial equivalent of the benefit determined at age 65. This benefit will be increased by the Cost of Living Adjustment detailed below.

An employee hired on or after July 1, 2006 (after May 4, 2008 for IBEW) may only select a benefit with a full Cost of Living Adjustment.

Except for employees detailed below, prior to age 65, the above benefit based on AFC and creditable service at retirement reduced by 2% for each year that retirement precedes age 65. For IBEW employees hired before May 4, 2008, who elect a contribution rate of 4% is elected the early reduction factor is 2% for each year the retirement precedes age 65. For IBEW employees hired before May 4, 2008, who elect a contribution rate of 3% the benefit is reduced by a factor which varies with age. The factor equals 1 at 65 and .4 at 50.

For IBEW employees hired after May 4, 2008, the benefit is reduced by a factor which varies by age. The factor equals 1 at 65 but is equal to .356 at age 55.

For AFSCME Local 1343 employees hired before January 1, 2006 that meet the Rule of 82 by December 7, 2011 but retire later than December 7, 2011, the reduction is 4% per year at ages 55 to 59 for each year under age 65, and the standard 2% per year reduction for ages 60 to 65. For other AFSCME Local 1343 employees retiring after December 7, 2011, there will be full actuarial reduction from ages 55 to 59 and the standard 2% per year reduction for ages 60 to 65.

Cost of Living Adjustment

Benefits increase annually by changes in the Consumer Price Index of more than 1%. For Class A Fire employees retiring after October 5, 2015, Class A Police employees retiring after August 29, 2016, Class B AFSCME employees retiring after October 30, 2015, Class B IBEW employees retiring after March 9, 2016, and all employees retiring after July 1, 2017, the maximum annual increase is 2.75%. For all other members, the maximum annual increase is 5%. Increases are not applicable to deferred vested benefit prior to commencement, survivor income benefit, disability benefit prior to normal retirement age or members who choose to have no cost of living adjustment. For Class B employees that retire after July 1, 2018, the retirement COLA will be determined annually by the BERS Board equal to the CPI-U Northeast Region, with a maximum COLA increase of 2.75%, except that if the funding level of the BERS falls below 81%, the BERS Board may reduce or vote for no COLA for payees prior to age 65 for the upcoming year. For Class A Police employees who retire after February 1, 2019 and Fire employees who retire after March 28, 2019, the retirement COLA will be determined annually by the BERS Board equal to the CPI-U Northeast Region, with a maximum COLA of 2.75%, except that if the Class A funding level of the BERS falls below 73%, the BERS Board may reduce or vote for no COLA for the upcoming year.

Service Adjustment

Class A service for calculation of benefits shall be adjusted such that any Class A employee shall be granted 1.07 years of credit for each year in which the employee worked prior to July 1, 1996, and 1.17 years thereafter, in a position regularly assigned a workweek consisting on average of fifty-three or more hours of work per week.

Disability Retirement

Eligibility

All Members. Permanently disabled. Class B AFSCME Local 1343 employees must have 2 years of creditable service to be eligible for disabilities that are not work-related. Class A Fire employees hired after October 7, 2011 must have 1 year of creditable service to be eligible for disabilities that are not work-related. All other employees are immediately eligible.

Amount of Benefit

A benefit payable until normal service retirement eligibility (Class A - age 55 and 5 years of creditable service, Class B - age 65 and 5 years of creditable service). For Class A Fire employees hired after October 7, 2011, it is equal to 66 2/3% of the member's earnable compensation less workmen's compensation. For Class B IBEW employees hired after October 20, 2012 and Class B AFSCME employees, it is equal to 66 2/3% of the member's earnable compensation less workmen's compensation and Social Security. For all others, it is equal to 75% of the member's earnable compensation less workmen's compensation and, in the case of Class B, less Social Security.

After normal service retirement eligibility, a service retirement benefit based on AFC at retirement and creditable service at normal service retirement eligibility, including the period while permanently disabled and receiving a disability benefit from the System.

Accidental Death

Eligibility

Class A only. Death due to accident while in the performance of duty.

Amount of Benefit

A benefit to the spouse until death or remarriage of the greater of (i) 55% of AFC, and (ii) the participant's current accrued retirement benefit. Upon death or remarriage of the spouse, the benefit will be payable to children until age 21.

Survivor Income

Eligibility

All members. Death in active service.

Amount of Benefit

Class A

30% of compensation during the July preceding death payable to spouse until earlier of death or 2nd anniversary of remarriage. An additional 5% per unmarried child under 21 (maximum additional 10%) is payable until benefits cease or children no longer eligible. If there is no spouse or spouse dies, the benefit is payable to unmarried children under age 21 until earlier of death, marriage or age 21.

Class B

30% of compensation during the July preceding death payable to spouse until earlier of death, 2nd anniversary of remarriage or age 62. Upon the spouse's attainment of age 62 (if not remarried) a benefit based on the 50% Joint and Survivor form of payment will be paid to the spouse for life. If there is no spouse or spouse dies, the benefit is payable to unmarried children under age 21 until earlier of death, marriage or age 21.

Return of Contributions

Accumulated contributions returned upon separation with no vested benefits under the plan or upon death with no accidental death benefit payable. Interest will accrue on these contributions at a rate of 5.5% until December 31, 2017 and 2.0% thereafter, or at a higher rate as may be set by the Retirement Board. Interest will only accrue on contributions made after June 30, 1980.

Upon death of a retired member, the excess of his contribution at retirement over the benefits paid will be paid to his beneficiary or estate.

Vested Retirement

Eligibility

5 years of creditable service.

Vesting percentage.

100% after 5 years. Prior to July 1, 2017, several groups had a graded vesting schedule of 20% after completion of 3 years of creditable service to 100% after completion of 7 years of creditable service.

Amount of Benefit

Class A

Vesting percentage times the benefit calculated using AFC and creditable service at termination. The benefit is payable commencing at age 55. Member may elect early receipt with reduction as for service retirement prior to age 55.

Class B

Vesting percentage times the benefit calculated using AFC and creditable service at termination. The benefit is payable commencing at age 65. Member may elect early receipt with reduction as for service retirement prior to age 65.

Survivor Spouse's Pension

Eligibility

All members. Death of a terminated member entitled to a vested retirement benefit prior to commencement of such benefit.

Amount of Benefit

50% of reduced accrued benefit reflecting the 50% Joint and Survivor form of payment (ages as of date payments commence) payable at member's early retirement date. Spouse may elect to receive payments later than member's early retirement date with no reduction for receipt at member's 65th birthday.

Offsets on Benefits

Disability and accidental death benefits are offset by workmen's compensation paid for the same disability or death.

Employee Contributions

Class A

11.0% of earnable compensation for Class A employees for the first 35 years of creditable service, and none thereafter.

Class A employees shall contribute to the BERS a percentage of their salary. The total contribution required from both the City and employees will be based on the annual system valuation prepared by the City's actuaries. Effective retroactive to July 1, 2018, employees shall contribute a percentage so that all employees are contributing 28% (and the City is contributing 72%) of the total contribution required. For Fiscal Year 2019, this means that each Class A employee contributed 12.69% of the employee's base pay. The individual employee contribution for each subsequent fiscal year will be determined prior to the beginning of the fiscal year.

Effective July 1, 2020, employees shall contribute a percentage so that all employees are contributing 29% (and the City is contributing 71%) of the total contribution required.

Effective July 1, 2021, employees shall contribute a percentage so that all employees are contributing 30% (and the City is contributing 70%) of the total contribution required.

Class B

Member contributions for Class B employees, who elected to continue to be eligible for early retirement benefits at 2% per year deduction between ages 55 and 65, in accordance with the 2006-2009 collective bargaining agreement will be 4.8% in fiscal year 2016-2017, and 5.2% beginning with fiscal year 2017-2018. Member contributions for all other Class B employees will be will be 3.8% in fiscal year 2016-2017, and 4.2% beginning with fiscal year 2017-2018.

Class B employees shall contribute to the BERS a percentage of their annual salary. The total contribution required from both the City and employees will be based on the annual system valuation prepared by the City's actuaries.

Effective retroactive to July 1, 2018, employees shall contribute a percentage so that all employees are contributing 28% (and the City is contributing 72%) of the total contribution required. For Fiscal Year 2019, this shall mean that the contribution rate for a Class B employee was 4.41% of the employee's base pay.

Contributions (continued)

Effective July 1, 2020, employees shall contribute a percentage so that all employees are contributing 29% (and the City is contributing 71%) of the total contribution required.

Effective July 1, 2021, employees shall contribute a percentage so that all employees are contributing 30% (and the City is contributing 70%) of the total contribution required.

Notwithstanding the above, an individual Class B employee’s contribution shall not exceed 5.6% of their eligible wages in Fiscal Year 2019, 5.8% in Fiscal Year 2020, 6.2% in Fiscal Year 2021, or 7% in Fiscal Year 2022.