



City of New York

OFFICE OF THE COMPTROLLER

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COMPTROLLER



SPECIAL REPORTS

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Deputy Comptroller for Audit

Analysis of the Financial and Operating
Practices of Union-Administered Benefit
Funds with Fiscal Years Ending in
Calendar Year 2013

SR16-089S

November 16, 2016

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THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
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November 16, 2016

To the Residents of the City of New York:

My office has analyzed the financial practices of 107 union-administered benefit funds that received approximately \$1.17 billion in City contributions during 2013. Benefit funds provide City employees, retirees and dependents with a variety of supplemental health benefits not provided under City-administered health insurance plans.

The purpose of this report is to provide a comparative analysis of the overall financial activities of union-administered benefit funds that received City contributions. The analyses contained in this report provide a means of comparing the operations of the funds and performance of fund trustees and administrators.

In summary, this report identifies the following financial issues:

- Certain funds spent a large percentage of their revenue on administrative expenses. Reducing administrative expenses would allow funds to increase benefits for members.
- Certain funds had large operating surpluses resulting in high reserves. Excess reserves may indicate that funds should increase members' benefits.
- The expenses of certain funds exceeded their revenues, resulting in operating deficits. Operating deficits could deplete fund reserves, which could ultimately lead to insolvency.

This report contains eight recommendations that are addressed to the funds' trustees and three recommendations to the Office of Labor Relations.

If you have any questions concerning this report, please e-mail my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,

Scott M. Stringer

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
Findings and Conclusions.....	1
Recommendations.....	2
REPORT OF ANALYSIS.....	5
Background	5
City Interest in the Operation of Benefit Funds	7
Objectives.....	8
Scope of Analysis	8
FUND EXPENSES	10
Welfare Funds: Administrative Expenses	12
Annuity Funds: Administrative Expenses.....	14
High Percentage Increases and Decreases in Revenue Spent on Administration	15
Administrative Expenses Versus Total Expenses.....	17
EXPENDITURES FOR BENEFITS.....	18
RESERVE LEVELS.....	22
OPERATING DEFICITS	25
ANALYSIS OF TOTAL REVENUE.....	27
Funds Should Address Financial and Operating Issues to Ensure Maximum Use of Revenue and Continued Financial Solvency	28
EXCEPTIONS ON FUND OPERATIONS	30
CPA Opinions	30
Late Submission of Directive #12 Reports.....	32
CPAs Were Not Selected from Comptroller's Prequalified List.....	34
Eligibility Delay	34
Consolidation of Professional Services.....	35
CONCLUSIONS AND RECOMMENDATIONS.....	36
Administrative and Benefit Expenses	36
Recommendations	36

Reserves	36
Recommendations	36
Exceptions on Fund Operations	37
Recommendations	37

EXHIBITS:

- A. Schedule of Official Fund Names
- B. Schedule of Financial Data
- C. Schedule of Administrative Expenses
- D. Schedule of Available Benefits
- E. Schedule of Benefit Fund Ratios
- F. Schedule of Funds that Do Not Use the Comptroller's List of Prequalified CPAs

APPENDICES:

- A. Comptroller's Internal Control and Accountability Directive #12
- B. Commonly Found Unacceptable Practices of Welfare Funds
- C. Comptroller's Audit Reports on Benefit Funds Issued in Fiscal Years 1985–2016
- D. Funds Using Common Professional Service Providers

THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER SPECIAL REPORTS

Analysis of the Financial and Operating Practices of Union-Administered Benefit Funds with Fiscal Years Ending in Calendar Year 2013

SR16-089S

EXECUTIVE SUMMARY

This report provides a comparative analysis of the overall financial activities of 90 union-administered active and retiree welfare funds and annuity funds that received approximately \$1.1 billion in City contributions for 2013¹. It is prepared annually based on independently audited financial reports and other information filed by the funds in accordance with New York City Comptroller's Directive #12. The report aggregates reported information and compares funds of similar type and size of City contribution in order to compare the amounts that are spent on administration, operating surplus/deficits, benefits provided, and year-end reserves.²

Findings and Conclusions

In 2013, \$101.2 million (8.38 percent on average) of the total revenue for the 90 welfare and annuity funds was spent on administration as compared to \$94.1 million (8.76 percent on average) spent on administration in 2012. Of these:

- 14 welfare funds spent a 30 percent larger percentage of their revenue on administrative expenses than other funds of a similar type and size.

¹ For 2013, the City contributed approximately \$1.17 billion to 107 union-administered funds that submitted Directive #12 filings. However, we limited the computation of category averages and other financial analyses in this report to 90 of the funds, which received \$1.14 (98 percent) of \$1.17 billion in total City contributions. The remaining 17 funds, which received a total of \$26.2 million (2 percent) of the City's contributions in 2013, were excluded from the analysis for different reasons which are detailed in the Scope of Analysis section of this report, and on page 4 of Exhibit B.

²The Comptroller's Office issued Directive #12 to ensure uniform reporting and auditing requirements for union-administered benefit funds that receive contributions from the City. The Comptroller's Directives are used to establish policies governing internal controls, accountability, and financial reporting. The Comptroller is not, however, a regulator with remedial powers charged with enforcing fiduciary obligations under a rubric of laws and regulations akin, for example, to the United States Department of Labor or the New York State Department of Financial Services.

- Seven welfare funds, which maintained high reserves, expended 20 percent lower-than-average amounts for benefits than other funds of a similar type and size.
- 14 funds had benefit expenditures that exceeded their revenues, causing each of these funds to dip into their reserves.
- 20 welfare funds in our analysis incurred operating deficits totaling \$14.0 million, which reduced their available reserves. The deficits ranged from \$5,479 to approximately \$2.7 million.

In summary, we identified the following financial issues in one or more of the funds that should be addressed by those funds:

- Expenses that exceeded revenues, resulting in operating deficits;
- Administrative expenses that exceeded the average for that category of fund; and
- Operating surpluses that resulted in higher than average reserves.

The analysis also identified other areas of concern, which include:

- 15 funds received qualified opinions from their independent auditors.
- 46 funds did not submit their Directive #12 reports in a timely manner.
- 81 funds did not use a certified public accountant (CPA) firm listed on the Comptroller's prequalified list as recommended by Directive #12.
- One fund delays benefit eligibility for new members in violation of its agreement with the City of New York.

Recommendations

As a result of our analysis, we make 11 recommendations, eight to the Trustees of individual funds and three to the Office of Labor Relations (OLR):

- Trustees of funds with higher than average percentages of administrative costs as compared to total revenues and/or low percentages of benefit expenses as compared with their total revenues should reduce administrative expenses and/or increase benefits to members.
- Trustees of funds that use the same professional service providers for similar services should consider jointly negotiating future contracts with these providers to reduce administrative expenses through economies of scale.

- Trustees of funds with low reserve levels should take steps to ensure that their funds remain solvent. To accomplish this goal, funds should seek to reduce administrative expenses. If this is not possible or does not provide sufficient funds to ensure solvency, the trustees should attempt to reduce costs associated with benefits.
- Trustees of funds that have incurred operating deficits, particularly those with low reserve levels, should ensure that anticipated benefit and administrative expenses will not exceed projected total revenue.
- Trustees of funds with higher than average reserve levels, particularly those whose funds spend less than average amounts of their revenue on benefits, should consider enhancing their members' benefits.
- Trustees of funds are required to submit to the Comptroller's Office an annual report showing the fund's condition and affairs in accordance with Directive #12 and that submission must be filed within nine months after the close of a fund's fiscal year-end. Trustees should ensure that these filings are timely made in accordance with Directive #12.
- Trustees of funds should consider contracting with CPAs that are listed on the Comptroller's prequalified list.
- Trustees of funds that delay members' eligibility for benefits beyond their first day of employment must revise their fund's policy to comply with their union's welfare fund agreement with the City.
- OLR should use the information in this report to ensure that the trustees of the funds correct the conditions cited in qualified opinions received from their independent accountants.
- OLR should consider withholding City contributions from delinquent funds that failed to submit their Directive #12 reports to the Comptroller's Office or fail to otherwise abide by the terms of that Directive and/or their Welfare Fund Agreements with the City.
- OLR should recover the portion of City contributions from those funds that do not provide benefits to members from their first day of employment.

In 2013, this report has identified 10 funds that had potential financial issues that should be addressed by fund management as shown in the chart on the following page.

Funds with Potential Financial Problems Identified in this Report
(Problem Areas Highlighted)

FUND	TOTAL REVENUE	OVERALL EXPENSES	SURPLUS OR OPERATING (DEFICIT)	BENEFITS EXPENSE		ADMINISTRATIVE EXPENSE		FUND BALANCE			CPA OPINIONS	RISK OF INSOLVENCY (SEE LEGEND)
				TOTAL	% OF REVENUE	TOTAL	% OF REVENUE	TOTAL	% OF REVENUE	BALANCE/ DEFICIT*		
Local 371 Social Service Employees WF/ED/Legal/ADM**	\$26,697,515	\$28,703,131	(\$2,005,616)	\$26,061,864	97.62%	\$2,641,267	9.89%	\$4,485,508	16.80%	-224	Unqualified	ST
Local 831 Uniformed Sanitationmen's Assoc WF	\$10,856,604	\$13,590,323	(\$2,733,719)	\$12,303,686	113.33%	\$1,286,637	11.85%	\$14,934,804	137.56%	-546	Unqualified	LT
Local 1182 CWA Security Benefits Fund WF/RWF/Legal**	\$5,786,188	\$5,612,444	\$173,744	\$4,655,602	80.46%	\$956,842	16.54%	\$3,396,112	58.69%	N/A	Qualified***	LT
Local 3 IBEW Electricians RWF	\$1,529,051	\$1,856,933	(\$327,882)	\$1,661,076	108.63%	\$195,857	12.81%	\$3,974,967	259.96%	-1212	Qualified***	N
1199 SEIU Licensed Practical Nurses WF	\$1,402,816	\$1,742,044	(\$339,228)	\$1,450,519	103.40%	\$291,525	20.78%	\$6,511,053	464.14%	-1919	Unqualified	N
Doctors Council WF**	\$1,252,563	\$1,896,886	(\$644,323)	\$1,582,270	126.32%	\$314,616	25.12%	\$3,735,412	298.22%	-580	Unqualified	N
Doctors Council RWF	\$780,870	\$1,069,946	(\$289,076)	\$899,658	115.21%	\$170,288	21.81%	\$2,307,236	295.47%	-798	Unqualified	N
NYC Deputy Sheriffs Assoc WF	\$151,210	\$156,689	(\$5,479)	\$152,789	101.04%	\$3,900	2.58%	\$69,689	46.09%	-1272	Unqualified	N
Local 306 Municipal Employees WF**	\$86,229	\$106,451	(\$20,222)	\$81,068	94.01%	\$25,383	29.44%	\$114,021	132.23%	-564	Unqualified	LT
NYC Deputy Sheriffs Assoc RWF	\$63,489	\$75,088	(\$11,599)	\$69,114	108.86%	\$5,974	9.41%	\$67,999	107.10%	-586	Unqualified	LT

Legend

N - Currently Not at Risk of Insolvency
ST – Short-term Risk of Insolvency within 1 - 3 years
LT - Long-term Risk of Insolvency greater than 3 years
N/A – Not Applicable

* A ratio estimating the number of years that a fund can operate before being "in the red" if all factors remain constant. For example, number "-101" would indicate the fund has approximately one year before becoming insolvent.

** These funds were also cited for Potential Financial Problems in 2012.

*** See Table XXI where the specific issue for this fund with a "Qualified" opinion is detailed.

REPORT OF ANALYSIS

Background

New York City has provided health insurance benefits to its employees since 1947. Since 1966, the City has provided its active employees, their families, and retirees with basic health and hospitalization coverage, among other benefits. As a result of collective bargaining with the unions that represent City employees, the City agreed to the establishment of union-administered benefit funds, to which the City contributes, so that employees can be provided with additional health and various other benefits beyond those provided by the City. In some cases, separate funds were established for retirees. For certain workers, in addition to contributing to the union-administered welfare funds, the City contributes to annuity funds that provide lump sum payments at retirement.

Pursuant to collective bargaining agreements, the City's contributions to the union-administered benefit funds are placed in legally established trusts administered by trustees appointed by the unions or associations. City officials are not directly involved in fund administration.

The determination of the types of benefits to be provided to members, the amounts paid, deductibles, and other terms of the operations and benefits provided is left to the trustees' discretion. The benefits provided are listed in the fund agreements between the City and the unions. Some funds now provide legal assistance and educational activities in addition to health benefits. Other funds, such as the Uniformed Officers' Funds, receive additional City contributions to operate Civil Legal Representation Funds that provide various types of legal services to their members. Some funds are self-insured; other funds provide most of their benefits through insurance companies.³ Typical benefits provided by funds to members and their families include:

- dental benefits—including regular exams;
- optical benefits for examinations and eyeglasses;
- prescription drug reimbursement;
- life insurance; and
- supplemental health and hospitalization.

Fund managers have a fiduciary responsibility to provide optimum benefits to members while keeping administrative costs to a minimum. A fund that accumulates excessive reserves or expends large amounts for administrative costs does not achieve its basic goal of providing optimum benefits to members.

For 2013, the City contributed approximately \$1.17 billion to 107 union-administered active and retiree welfare funds and annuity funds.⁴ The annual contribution to each

³ Of the 107 funds, only five were insured. Together, these funds received only \$3.5 million (less than ¼ of one percent) of the \$1.17 billion in NYC Contributions paid in 2013. Insured funds pay premiums to insurance companies, like The Hartford for life insurance; GHI Dental for Dental benefits; Davis Vision for Optical benefits; and AFLAC for Cancer Benefits, and these insurance companies pay all member claims. The remaining 102 funds are self-insured. These self-insured funds may also pay premiums to insurance companies for some of their benefits (up to 20% of total member benefits), but most member claims are paid directly by the funds. In addition, self-insured funds may employ a third party company (such as Administrative Services Only) to process the claims.

⁴ Some unions offer education, legal services, and disability benefits through separate funds. For purposes of this report, we consolidated these separate funds with their respective welfare-benefit funds.

welfare fund varied based on its union's collective bargaining agreement with the City.

As of the end of their 2013 fiscal years, net assets available for plan benefits for the 107 benefit funds totaled \$8.8 billion, including nearly \$2.2 billion for the 76 welfare funds and \$6.6 billion for the 31 annuity funds.

In 2013, 24 benefit funds received more than \$10 million each from the City, accounting for approximately 83 percent of the City's contributions to the 107 funds as shown in Table I.

Table I
Funds Receiving More Than \$10 Million*
in City Contributions in 2013

<u>Fund Name</u>	<u>Total Revenue</u>	<u>NYC Contribution**</u>
Local 2 United Federation of Teachers WF/RWF	\$290,040,939	\$286,335,808
DC 37 WF	243,773,320	225,971,756
Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM	51,938,177	48,759,395
Professional Staff Congress CUNY WF/RWF	47,883,126	47,195,166
Patrolmen's Benevolent Assoc RWF	44,477,247	38,269,180
Patrolmen's Benevolent Assoc WF/CLRF	37,151,020	36,819,151
Local 237 Teamsters WF	35,749,066	32,018,813
Local 371 Social Service Employees WF/ED/Legal/ADM	26,697,515	26,573,544
Sergeants Benevolent Assoc (Police) WF/RWF/CLRF	20,749,920	20,138,117
Detectives Endowment Assoc RWF	22,481,651	18,003,387
Local 831 Uniformed Sanitationmen's Assoc AF	29,867,043	17,999,990
Local 94 Uniformed Firefighters Assoc RWF	29,037,369	17,731,942
Local 237 Teamsters RWF	21,335,506	17,234,894
Local 237 Teamsters AF	54,398,718	15,864,238
Correction Officers' Benevolent Assoc WF/CLRF	16,343,062	15,724,628
Local 831 Uniformed Sanitationmen's Assoc RWF	18,188,312	14,645,969
New York State Nurses Assoc WF	14,791,103	13,044,692
Correction Officers' Benevolent Assoc RWF	13,601,124	12,607,184
Local 94 Uniformed Firefighters Assoc WF	15,457,247	12,152,229
Patrolmen's Benevolent Assoc AF	30,483,488	11,952,633
Local 1 Council of Supervisors & Admin RWF	12,506,490	11,410,442
Organization of Staff Analysts WF/RWF/ED	10,680,072	11,059,228
Local 371 Social Service Employees AF	15,716,579	10,892,240
Local 1 Council of Supervisors & Admin WF	11,056,820	10,352,922
Total (24 Funds)	\$1,114,404,914	\$972,757,548
Total (107 Funds)		\$1,168,577,781
Percent of Total		83%

* This cutoff figure is arbitrary and used for descriptive purposes only.

** The difference between Total Revenue and New York City (NYC) contributions consists of revenue from interest, dividends, other employer contributions, miscellaneous income, and gains/losses on investments.

<u>Fund Abbreviations</u>	
<i>ADM = Administration Fund</i>	<i>Legal = Legal Services Fund</i>
<i>AF = Annuity Fund</i>	<i>RWF = Retiree Welfare Fund</i>
<i>CLRF = Civil Legal Representation Fund</i>	<i>WF = Welfare Fund</i>
<i>ED = Education Fund</i>	

Table II identifies the number and types of funds that received contributions from the City in 2013 by size:

Table II
Number and Categories of
Benefit Plans in 2013 Survey

<u>NYC Contributions</u> <u>Revenue Category</u>	<u>Active and</u> <u>Retiree</u>	<u>Annuity</u>	<u>Total</u>	<u>Total NYC</u> <u>Contributions</u>
Up to \$1 million	16	7	23	\$9,168,515
\$1 million to \$3 million	18	4	22	37,646,011
\$3 million to \$10 million	10	11	21	122,775,551
\$10 million to \$20 million	11	4	15	210,676,618
More than \$20 million	9	0	9	762,080,930
Funds in Survey	64	26	90	\$1,142,347,625
Funds excluded from analysis because they would have distorted the results ⁵	<u>12</u>	<u>5</u>	<u>17</u>	<u>\$26,230,156</u>
Total All Funds	<u>76</u>	<u>31</u>	<u>107</u>	<u>\$1,168,577,781</u>

City Interest in the Operation of Benefit Funds

Although City officials are not directly involved in regulating or administering the funds, their benefit fund agreements with OLR require all union-administered benefit funds that receive City contributions to comply with Comptroller's Internal Control and Accountability Directive #12. First published in 1977, Comptroller's Directive #12 provides uniform reporting and auditing requirements for all benefit funds. In 1997, it was revised to include provisions that modified fund reporting requirements, required assessments of consultant services, modified the criteria for contracting services through competitive bids, and expanded the requirements for hiring independent certified public accountants to audit the funds. (Appendix A contains the revised Directive #12 in use during Fiscal Year 2013.)

The benefit fund agreements, along with Directive #12 reporting requirements, help the City, the funds, and their members monitor the funds' financial and operating activities. Towards that end, the follow requirements are imposed:

- The fund trustees are required to keep accurate records in conformance with generally accepted accounting principles (GAAP). The funds must be audited annually by a CPA selected by the trustees. Comptroller's Directive #12 strongly recommends that funds select independent certified public accountants through a competitive proposal process and that funds contract only with firms listed on the Comptroller's prequalified list of CPAs. The CPA audit report must be submitted by the fund to the Comptroller's Office. Funds are also subject to further audit by the Comptroller's Office.

⁵ See page 4 of Exhibit B at the end of this report for a complete list of the 17 funds and the reason each fund was excluded from this analysis.

- Nine months after the close of its fiscal year, each fund's trustees must file a report with the Comptroller's Office showing the fund's "condition and affairs" during its fiscal year.⁶ The report must contain information as prescribed in Comptroller's Directive #12. In addition, an annual membership report must be mailed to all fund members that summarizes the financial condition of the fund.

In addition to providing a uniform reporting mechanism, Directive #12 requires that the funds' CPAs prepare management letters commenting upon weaknesses in internal and management controls that were identified during their audits. These management letters are submitted to the City Comptroller along with the audited financial statements. Further, Directive #12 requests comments on management matters, such as investment policies, bidding practices, staff utilization, and accounting allocations. Directive #12 also requires that every year each fund report the percentage of administrative costs to total annual revenue. Overall, this percentage is expected to be "reasonable."

Objectives

Our objective was to provide comparative data on the overall financial activities of 90 of the 107 union-administered active and retiree welfare, education, and annuity funds⁷ that received City contributions during the funds' Fiscal Year 2013⁸ and that submitted data to the City Comptroller in accordance with Directive 12.

Scope of Analysis

The purpose of this report is to provide a comparative analysis of the overall financial activities of the funds and their benefits. The individual analyses also supplement the independent CPA audits by providing additional information to assess the performance of the fund trustees and administrators with reference to fund expenditures. This report is based upon Fiscal Year 2013 financial reports and other information filed by the 107 funds with the Comptroller's Office, as required by Comptroller's Directive #12.⁹ (See Exhibit A for a list of funds with their official and abbreviated names.)

We reviewed the financial information for the 107 benefit funds. However, we limited the computation of category averages and other financial analyses to 90 of the funds, which received \$1.14 (98 percent) of \$1.17 billion in total City contributions, while providing benefits to the bulk of the City's work force, during the funds' 2013 Fiscal Year. The remaining 17 funds, which received a total of \$26.2 million (2 percent) of the City's contributions in 2013, were excluded for different reasons: nine funds received more than 90 percent of their revenue from sources other than the City; three funds included other groups that received substantial revenue from sources other than the City; one College Scholarship Fund provided benefits only to public high school students; three funds had fiscal year-ends

⁶ The main component of the "condition and affairs" is the financial statements, which are audited and certified by an independent CPA firm. Most of the other documents (i.e., Administrative and Benefit Expense Schedules) include various calculations derived from information contained in the financial statements.

⁷ At the end of the report, Exhibit B has financial data for the 107 funds.

⁸ Most of the funds' fiscal years ended in either June or December 2013.

⁹ Directive #12 filings are generally received during the following calendar year because, according to Directive #12, the funds have up to nine months after the close of their fiscal years (some of which end on December 31) to submit the required data.

different from their associated welfare funds¹⁰; and one fund no longer received contributions from the City. (See Exhibit B for Revenues, Expenses and Fund Balances information on the 107 Funds.)

This report compares certain aspects of the 90 included funds and identifies operational norms and deviations during Fiscal Year 2013. The report's analysis is based on the financial activities of benefit funds receiving contributions from the City during Calendar Year 2013. To perform these analyses, we compute 10 category averages to compare each of the 90 funds to other funds of similar type and size of City contribution as shown in the chart below. Our results can then be used by fund trustees and administrators to perform their own internal analyses.

Comparative Analysis: Categories of Similar Funds

CAT	FUND TYPE		CITY CONTRIBUTION	FUNDS	TOTAL
1	Active & Retiree Welfare Funds	Self – Insured Benefits	Up to \$1 million	12	64
2			\$1 million to \$3 million	17	
3			\$3 million to \$10 million	10	
4			\$10 million to \$20 million	11	
5			More than \$20 million	9	
6	Insured Benefits	Up to \$3 million	5		
7	Annuity Funds		Up to \$1 million	7	26
8			\$1 million to \$3 million	4	
9			\$3 million to \$10 million	11	
10			More than \$10 million	4	
TOTAL					

This report's tables, exhibits, and appendices can be a starting point for fund trustees and administrators to identify areas for cost reduction or other appropriate action to ensure financial solvency. No conclusions should be drawn from any single exhibit in this report. For example, even though an exhibit might show that a particular fund's benefit expenses exceeded its revenues, it might not be a problem if the fund has sufficient or high reserves. On the other hand, funds incurring high administrative costs relative to other funds of a similar size should review their costs carefully and reduce them whenever possible.

Our examination was performed in accordance with the City Comptroller's responsibilities under Chapter 5, §93, of the New York City Charter, and under the provisions of agreements between the City and the individual unions.

¹⁰ These funds had different fiscal year-end dates than their associated welfare funds so that consolidation would have distorted the information reported.

FUND EXPENSES

For purposes of this report, benefit expenses include costs directly associated with providing benefits to members, such as salaries or other payments to professionals who provide direct services to members, such as attorneys who provide legal services to members, instructors who conduct in-house training for members, and physicians who examine members for worker's disability purposes. Administrative expenses include salaries for fund employees, insurance company retention fees,¹¹ overhead costs involved in doing business (e.g., costs associated with processing claims), rent for office space and office expenses, professional fees paid for legal, accounting, and consultant services, and expenditures for travel and conferences. (See Exhibit C for a breakdown of Administrative Expenses.)

In 2013, more than \$101.2 million (8.38 percent on average) of total revenue was spent on administering the 90 funds as compared to \$94.1 million (8.76 percent on average) for 90 funds in 2012. The largest single component—salaries for administrative and clerical staff totaling \$43.0 million—represented 42.5 percent of total administrative expenses in 2013. Other major administrative expenses included \$15.3 million for consultant services, \$13.1 million for office-related expenses, \$7.8 million for rent, \$7.7 million for investment and custodial services, \$4.8 million for legal, accounting, and auditing services, and \$1.4 million for insurance retention charges.

For comparison of fund expenses, operating deficits and reserve levels, we categorized the funds into the following three groups:

- Self-insured active and retiree welfare funds;
- Insured active and retiree welfare funds (we classified a fund as insured if at least 80 percent of its benefits was provided by insurance companies rather than directly by the fund); and
- Annuity funds.

Current funds' agreements do not specify what portion of the funds' total revenue may be reasonably spent on administrative expenses. In the absence of such guidelines, we calculated the average for each fund category (based on funds of similar size) to enable us to identify those funds whose administrative expenses deviated significantly from these averages. Table III indicates, by fund category, the average amount and percentages of total revenue expended by the 90 funds on administrative costs and the range of such percentages in 2013.

¹¹ In health insurance, the retention fee is the fraction of the premium amount which goes toward administrative costs.

Table IIIAverage Amount, Percentage of Total Revenue and Percentage Range Spent on Administration* by Fund Category

Self-Insured Active and Retiree Welfare Funds:

<u>NYC Contributions Revenue Category</u>	<u>Funds</u>	<u>Average Amount</u>	<u>Percent</u>	<u>Percentage Range</u>
Up to \$1 million	12	\$87,091	17.78%	5.87 to 30.73%
\$1 million to \$3 million	17	225,758	13.97	6.15 to 26.55
\$3 million to \$10 million	10	647,778	9.06	5.08 to 16.54
\$10 million to \$20 million	11	1,005,314	6.54	2.69 to 13.40
More than \$20 million	9	7,475,939	8.22	3.89 to 11.47
Overall Average 2013	59	\$1,705,680	11.12%	
Overall Average 2012	59	\$1,419,442	11.00%	

Insured Active and Retiree Welfare Funds:

<u>NYC Contributions Revenue Category</u>	<u>Funds</u>	<u>Average Amount</u>	<u>Percent</u>	<u>Percentage Range</u>
Up to \$3 million	5	\$87,377	10.38%	2.58 to 16.38%
Overall Average 2013	5	\$87,377	10.38%	
Overall Average 2012	5	\$72,551	10.62%	

Annuity Funds:

<u>NYC Contributions Revenue Category</u>	<u>Funds</u>	<u>Average Amount</u>	<u>Percent</u>	<u>Percentage Range</u>
Up to \$1 million	7	\$100,458	7.36%	0 to 20.16%
\$1 million to \$3 million	4	227,298	4.28	2.87 to 5.36
\$3 million to \$10 million	11	507,815	2.85	0.62 to 9.88
\$10 million to \$20 million	4	973,061	3.30	1.97 to 5.67
Overall Average 2013	26	\$496,125	4.45%	
Overall Average 2012	26	\$385,066	5.50%	

* Our analysis of the administrative expenses as reported on the financial statements is uniformly evaluated for the purpose of our report. At times, we may be required to reclassify specific expenses (i.e., insurance retention) to ensure that all funds are evaluated uniformly.

Welfare Funds: Administrative Expenses

Welfare funds provide benefits on a self-insured or insured basis. Whether a fund is self-insured or insured significantly affects the level of its reported administrative expenses. Self-insured funds categorize claims processing costs as administrative expenses, while insured funds include most claims processing costs as part of their insurance premiums and thus categorize them as benefit expenses. Therefore, reported administrative expenses of self-insured funds are generally higher than those of insured funds. To make comparisons between self-insured and insured funds more meaningful, we transferred insurance company retention charges to administrative costs whenever possible. Table IV lists selected self-insured and insured welfare funds that spent at least 30 percent higher-than-average percentage of their revenue on administrative expenses in 2013.

Table IV
Active and Retiree Welfare Funds with
High Administrative Expense-to-Revenue Ratios

<u>Fund Name</u>	<u>Category Average</u>	<u>Fund</u>	<u>Percentage Deviation From Category Average</u>
<u>Self-Insured: Up to \$1 million</u>			
Local 15, 15A, 15C Operating Engineers WF/RWF*	17.78%	30.73%	72.80%
Local 306 Municipal Employees WF*	17.78	29.44	65.55
United Probation Officers Assoc RWF*	17.78	24.93	40.20
<u>Self-Insured: \$1 million to \$3 million</u>			
United Probation Officers Assoc WF*	13.97	26.55	90.06
Doctors Council WF*	13.97	25.12	79.77
Local 891 School Custodian & Engineers WF/RWF/ED	13.97	21.44	53.43
1199 SEIU Licensed Practical Nurses WF	13.97	20.78	48.74
<u>Self-Insured: \$3 million to \$10 million</u>			
Local 1182 CWA Security Benefits Fund WF/RWF/Legal*	9.06	16.54	82.59
Local 831 Uniformed Sanitationmen's Assoc WF*	9.06	11.85	30.85
<u>Self-Insured: \$10 million to \$20 million</u>			
Organization of Staff Analysts WF/RWF/ED	6.54	13.40	104.73
Local 1 Council of Supervisors & Admin RWF*	6.54	10.16	55.26
Local 1 Council of Supervisors & Admin WF*	6.54	9.50	45.21
<u>Self-Insured: More than \$20 million</u>			
Local 237 Teamsters WF*	8.22	11.47	39.41
<u>Insured: Up to \$1 million</u>			
Local 333 United Marine Division WF*	10.38	16.38	57.76

* These funds also incurred higher-than-average administrative costs in 2012.

Table V lists selected self-insured and insured welfare funds that spent at least 30 percent lower-than-average percentage of their revenue on administrative expenses in 2013.

Table V

Active and Retiree Welfare Funds with
Low Administrative Expense-to-Revenue Ratios

<u>Fund Name</u>	<u>Category Average</u>	<u>Fund</u>	<u>Percentage Deviation From Category Average</u>
<u>Self-Insured: Up to \$1 million</u>			
Local 3 IBEW City Employees WF	17.78%	5.87%	(67.62%)
Local No. 5 MNCPL Employees Benefit Trust Fund*	17.78	7.71	(56.63)
<u>Self-Insured: \$1 million to \$3 million</u>			
Correction Captains Assoc RWF*	13.97	6.15	(55.95)
Local 211 Allied Building Inspectors WF*	13.97	6.36	(54.50)
Local 444 Sanitation Officers WF*	13.97	6.57	(52.97)
DC 9 Painting Industry WF/RWF (Local 1969)	13.97	8.86	(36.56)
Correction Captains Assoc WF/CLRF*	13.97	8.99	(35.68)
NYC Municipal Plumbers & Pipefitters WF*	13.97	9.12	(34.75)
<u>Self-Insured: \$3 million to \$10 million</u>			
Local 854 Uniformed Fire Officers Assoc WF*	9.06	5.08	(43.94)
Local 444 Sanitation Officers RWF*	9.06	5.66	(37.50)
New York City RWF*	9.06	6.05	(33.24)
<u>Self-Insured: \$10 million to \$20 million</u>			
Local 94 Uniformed Firefighters Assoc RWF*	6.54	2.69	(58.85)
Local 831 Uniformed Sanitationmen's Assoc RWF*	6.54	3.24	(50.47)
Correction Officers' Benevolent Assoc WF/CLRF*	6.54	3.88	(40.66)
Correction Officers' Benevolent Assoc RWF*	6.54	4.29	(34.50)
<u>Self-Insured: More than \$20 million</u>			
Professional Staff Congress CUNY WF/RWF*	8.22	3.89	(52.66)
Sergeants Benevolent Assoc (Police) WF/RWF/CLRF	8.22	5.42	(34.09)
<u>Insured: Up to \$1 million</u>			
NYC Deputy Sheriffs Assoc WF*	10.38	2.58	(75.16)

* These funds also incurred lower-than-average administrative costs in 2012.

Without full audits of the individual welfare funds, it is not possible to determine why these funds incurred higher-than-average or lower-than-average administrative costs compared to their category averages.

Annuity Funds: Administrative Expenses

In addition to contributing to the active and retiree welfare funds, the City contributes to annuity funds for uniformed employees and other specific workers on active duty. These funds pay out annuities upon a covered employee's termination from City service. The amounts of the lump sum distributions are based on the value of the covered employees' accounts and can include City contributions plus interest and dividends, investment appreciation (depreciation), or other income.

Annuity funds differ from active and retiree welfare funds in that they derive a significant portion of their total revenue from investment income and generally provide only one type of benefit. The percentage of revenue that annuity funds spend on benefits and administration is not comparable to the percentages spent by active and retiree welfare funds. Therefore, we computed category averages for the 26 annuity funds covered in this report separately from those calculated for active and retiree welfare funds. Table VI highlights the five annuity funds that spent at least 30 percent higher-than-average percentage of their revenue on administrative expenses in 2013.

Table VI

Annuity Funds with High Administrative
Expense-to-Revenue Ratios

<u>Fund Name</u>	<u>Category Average</u>	<u>Fund</u>	<u>Percentage Deviation From Category Average</u>
<u>Up to \$1 million</u>			
Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF*	7.36%	20.16%	174.12%
<u>\$3 million to \$10 million</u>			
DC 37 AFSCME AF*	2.85	9.88	246.28
Correction Officers' Benevolent Assoc AF	2.85	4.48	57.07
Detectives Endowment Assoc AF*	2.85	3.77	32.26
<u>\$10 million to \$20 million</u>			
Local 371 Social Service Employees AF	3.30	5.67	71.88

* This fund also incurred higher-than-average administrative costs in 2012.

Without full audits of the individual annuity funds, it is not possible to determine why these funds' administrative costs exceeded their category averages.

Reducing administrative expenses would increase the members' equity and result in larger annuity payments to members.

High Percentage Increases and Decreases in Revenue Spent on Administration

There may be many reasons why administrative expenses change significantly from one year to the next. For example, funds may contract with providers (e.g., accountants, attorneys, and consultants) in one year and not another, or trustees may change the basis of expense allocations between the union and the fund. However, without full audits of the individual funds, it is not possible to determine whether changes in administrative expenses reflect improvements or deteriorations for the funds, or neither. Table VII shows funds that have increased the percentage of their revenues spent on administration by at least 30 percent from 2012 to 2013. Table VIII shows funds that reduced the percentage of their revenues spent on administration by at least 30 percent from 2012 to 2013.

Table VII
High Percentage Increase of
Revenue Spent on Administration

<u>Fund Name</u>	<u>Administrative Expense Percent of Total Revenue</u>	
	<u>2012</u>	<u>2013</u>
Local 371 Social Service Employees AF*	3.69%	5.67%
1199 SEIU Licensed Practical Nurses WF	13.66	20.78
Local 891 School Custodian & Engineers WF/RWF/ED	14.67	21.44
NYC Muni. Steamfitters & Steamfitter Helpers WF	9.62	13.91
Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF	14.40	20.16
Local 3 IBEW Electricians WF	9.78	13.57
Local 246 SEIU RWF	10.15	13.82
Local 246 SEIU WF	10.48	13.90
DC 37 WF	7.70	10.03

Table VIII**High Percentage Decrease of
Revenue Spent on Administration**

<u>Fund Name</u>	<u>Administrative Expense Percent of Total Revenue</u>		<u>Percentage Decrease</u>
	<u>2012</u>	<u>2013</u>	
Sergeants Benevolent Assoc (Police) AF	9.08%	1.47%	(83.80%)
Local 3 IBEW City Employees WF	19.99	5.87	(70.64)
Patrolmen's Benevolent Assoc AF	5.97	2.56	(57.19)
DC 9 Painting Industry WF/RWF (Local 1969)	20.17	8.86	(56.05)
Superior Officers Council (Police) AF	2.68	1.23	(54.17)
Local 94 Uniformed Firefighters Assoc AF	2.13	1.18	(44.57)
Assistant Dep Wardens/Dep Wardens AF	8.64	4.86	(43.80)
Local 1180 CWA Members AF	3.94	2.22	(43.61)
Fire Alarm Dispatchers Benevolent Assoc WF	18.03	11.53	(36.03)
Local 854 Uniformed Fire Officers Assoc AF	2.64	1.76	(33.33)
Local No. 5 MNCPL Employees Benefit Trust Fund	11.56	7.71	(33.27)
Local 237 Teamsters AF	4.43	3.00	(32.31)

Administrative Expenses Versus Total Expenses

Administrative expenses are directly related to benefit expenses and volume since an increased number of claims processed could result in a need for require increased staffing, greater personnel costs and increased need for supplies and ancillary costs. Table IX illustrates the category average percentages of administrative expenses to total revenue and to total expenses.

Table IX

Administrative Expenses as a Percentage of Total Revenue and Total Expenses

Self-Insured Active and Retiree Welfare Funds:

<u>NYC Contributions Revenue Category</u>	<u>Number of Funds</u>	<u>Percentage of</u>	
		<u>Revenue</u>	<u>Expenses</u>
Up to \$1 million	12	17.78%	18.35%
\$1 million to \$3 million	17	13.97	13.60
\$3 million to \$10 million	10	9.06	9.07
\$10 million to \$20 million	11	6.54	7.53
More than \$20 million	9	8.22	8.31
Overall Average 2013	59	11.12%	11.37%
Overall Average 2012	59	11.00%	11.71%

Insured Active and Retiree Welfare Funds:

<u>NYC Contributions Revenue Category</u>	<u>Number of Funds</u>	<u>Percentage of</u>	
		<u>Revenue</u>	<u>Expenses</u>
Up to \$3 million	5	10.38%	10.56%
Overall Average 2013	5	10.38%	10.56%
Overall Average 2012	5	10.62%	11.50%

Annuity Funds:

<u>NYC Contributions Revenue Category</u>	<u>Number of Funds</u>	<u>Percentage of</u>	
		<u>Revenue</u>	<u>Expenses</u>
Up to \$1 million	7	7.36%	14.13%
\$1 million to \$3 million	4	4.28	17.90
\$3 million to \$10 million	11	2.85	7.91
\$10 million to \$20 million	4	3.30	10.52
Overall Average 2013	26	4.45%	12.62%
Overall Average 2012	26	5.50%	12.51%

EXPENDITURES FOR BENEFITS

The City has not established guidelines for welfare funds regarding the percentage of annual revenue that should be spent on benefits. In the absence of such guidelines, we calculated category averages for the funds listed below in Table X to illustrate by category the average amount and percentages of total revenue expended by funds on benefits. Wherever funds insured some or all of their benefits, we reduced the total premiums by the retention charges and other overhead costs involved in doing business (e.g., costs associated with processing claims) to calculate net benefit expenses.

Table X
Percentage of Total Revenue
Spent on Benefits by Fund Category

Self-Insured Active and Retiree Welfare Funds:

<u>NYC Contributions</u> <u>Revenue Category</u>	<u>Percentage of</u> <u>Revenue</u>
Up to \$1 million	80.70%
\$1 million to \$3 million	87.93
\$3 million to \$10 million	91.15
\$10 million to \$20 million	79.12
More than \$20 million	89.73
Overall Average 2013	85.73%
Overall Average 2012	83.28%

Insured Active and Retiree Welfare Funds:

<u>NYC Contributions</u> <u>Revenue Category</u>	<u>Percentage of</u> <u>Revenue</u>
Up to \$3 million	90.37%
Overall Average 2013	90.37%
Overall Average 2012	84.81%

Although these percentages do not indicate the quality of benefits provided, they do provide a benchmark for comparison and further study. (Exhibit D at the end of this report indicates the amounts expended and the types of benefits provided by the funds.)

Some funds spent more for benefits than the average for funds within their category and others spent less. Table XI lists selected funds whose benefit expenses exceeded the averages in their respective category averages. However, when a fund's expenses exceed the category average, it does not necessarily represent a problem. For example, Local 15, 15A, 15C Operating Engineers WF/RWF exceeded its category average, but still had sufficient reserves to ensure its continued financial solvency. Fund officials need to examine the relationship of benefit expenditures to total revenues to ensure the fund achieves a proper balance. (See Table XVII for more details.)

Table XI

Self-Insured and Insured
Active and Retiree Welfare Funds
with High Benefit-to-Revenue Ratios

<u>Fund Name</u>	<u>Benefits as a Percentage of Total Revenue</u>		
	<u>Category Average</u>	<u>Fund</u>	<u>Percentage Deviation from Category Average</u>
Local 15, 15A, 15C Operating Engineers WF/RWF	80.70%	133.66%	65.63%
Doctors Council WF*	87.93	126.32	43.67
Doctors Council RWF	80.70	115.21	42.77
NYC Muni. Steamfitters & Steamfitter Helpers WF	80.70	108.36	34.28
Local 3 IBEW Electricians WF	87.93	116.51	32.51
Local 831 Uniformed Sanitationmen's Assoc WF	91.15	113.33	24.33
Local 3 IBEW Electricians RWF	87.93	108.63	23.55
NYC Deputy Sheriffs Assoc RWF	90.37	108.86	20.46

* These funds also incurred higher-than-average benefit costs in 2012.

In contrast, Table XII lists selected funds whose benefit expenses were below their respective category averages. This indicates that the funds should consider enhancing their members' benefits, especially if their fund reserves are large. For example, in 2013, Local 211 Allied Building Inspectors WF paid out 32.01 percent less in benefits than was the average for the other funds in its category, while its reserves approached \$8.5 million, amounting to nearly six times its benefit expense.

Table XII

Self-Insured and Insured
Active and Retiree Welfare Funds
with Low Benefit-to-Revenue Ratios

<u>Fund Name</u>	<u>Benefits as a Percentage of Total Revenue</u>		
	<u>Category Average</u>	<u>Fund</u>	<u>Percentage Deviation from Category Average</u>
Local No. 5 MNCPL Employees Benefit Trust Fund *	80.70%	26.60%	(67.03%)
Local 3 IBEW City Employees WF	80.70	45.33	(43.82)
United Probation Officers Assoc RWF	80.70	54.31	(32.71)
Local 211 Allied Building Inspectors WF	87.93	59.78	(32.01)
Fire Alarm Dispatchers Benevolent Assoc WF*	90.37	71.11	(21.31)
Local 246 SEIU RWF	87.93	69.72	(20.70)
Local 14 –14B IUOE WF/RWF	80.70	64.30	(20.32)

* These funds also incurred lower-than-average benefit costs in 2012.

The benefit expenses for the 14 funds listed in Table XIII exceeded total revenue, causing the funds to dip into their reserves. The use of reserves for benefits may indicate that the benefits provided were not evaluated in relation to the resources available to the funds.

Table XIII

Self-Insured and Insured
Active and Retiree Welfare Funds with
Benefit Expenses that Exceeded Their Revenue

<u>Fund Name</u>	<u>Total Revenue</u>	<u>Benefit Expense</u>	<u>Percentage of Revenue Spent on Benefits</u>	<u>2012-2013 Percentage Decrease in Reserves</u>	<u>Ending Fund Balance 2013</u>
<u>Self-Insured: Up to \$1 million</u>					
NYC Muni. Steamfitters & Steamfitter Helpers WF*	\$197,726	\$214,265	108.36%	2.22%	\$1,543,397
Local 15, 15A, 15C Operating Engineers WF/RWF*	632,637	845,585	133.66	7.41	5,091,536
Doctors Council RWF*	780,870	899,658	115.21	11.13	2,307,236
<u>Self-Insured: \$1 million to \$3 million</u>					
NYC Municipal Plumbers & Pipefitters WF*	1,183,461	1,222,456	103.29	4.03	3,870,764
Doctors Council WF*	1,252,563	1,582,270	126.32	14.71	3,735,412
DC 9 Painting Industry WF/RWF (Local 1969)	1,460,239	1,515,708	103.80	8.46	2,000,288
Local 3 IBEW Electricians RWF*	1,529,051	1,661,076	108.63	10.08	3,974,967
1199 SEIU Licensed Practical Nurses WF*	1,402,816	1,450,519	103.40	4.95	6,511,053
Local 3 IBEW Electricians WF*	1,728,321	2,013,700	116.51	8.54	7,370,038
<u>Self-Insured: \$3 million to \$10 million</u>					
Local 854 Uniformed Fire Officers Assoc WF*	3,936,332	4,233,729	107.56	4.65	10,192,950
Detectives Endowment Assoc WF*	8,881,124	9,067,928	102.10	5.09	18,887,154
Local 831 Uniformed Sanitationmen's Assoc WF	10,856,604	12,303,686	113.33	15.47	14,934,804
<u>Insured: Up to \$3 million</u>					
NYC Deputy Sheriffs Assoc RWF	63,489	69,114	108.86	14.57	67,999
NYC Deputy Sheriffs Assoc WF	151,210	152,789	101.04	7.29	69,689

* These funds also had high reserves (fund balances) in relation to annual revenue (see Table XVI), so the benefit spending in excess of revenue is not a major concern.

Fund trustees should carefully examine the relationship of benefit expenditures to revenues. If a fund overspends on benefits, it may use up necessary reserves. If a fund underspends on benefits, it may provide insufficient benefits for its members while building unnecessary reserves. The funds should achieve a proper balance.

RESERVE LEVELS

Reserves held by the self-insured and insured active and retiree welfare funds provide a cushion if claims for benefits exceed revenues in any particular year. Reserves accumulate when fund revenues exceed fund expenses. (See Exhibit B.) These amounts are separate and distinct from any amounts held by insurance carriers. Table XIV shows the reserve averages for each fund category.

Table XIV

Average Amount of Reserves
and Percentage of Reserves to
Annual Revenue by Category

Self-Insured Active and Retiree Welfare Funds:

<u>NYC Contributions Revenue Category</u>	<u>Number of Funds</u>	<u>Average Amount</u>	<u>Percent of Total Revenue</u>
Up to \$1 million	12	\$1,504,832	318.03%
\$1 million to \$3 million	17	3,932,998	232.90
\$3 million to \$10 million	10	11,387,867	162.84
\$10 million to \$20 million	11	27,743,591	164.54
More than \$20 million	9	75,576,483	85.19
<hr/>			
Overall Average 2013	59	\$24,029,154	108.81%
Overall Average 2012	59	\$24,014,192	196.90%

Insured Active and Retiree Welfare Funds:

<u>NYC Contributions Revenue Category</u>	<u>Number of Funds</u>	<u>Average Amount</u>	<u>Percent of Total Revenue</u>
Up to \$3 million	5	\$822,765	113.33%
<hr/>			
Overall Average 2013	5	\$822,765	113.33%
Overall Average 2012	5	\$793,558	109.12%

For insured active and retiree welfare funds: using 100 percent of total annual revenue as a reasonable level for reserves, we identified three funds that had reserves in excess of this amount in 2013, which are listed in Table XV. Three of the four funds also had reserves of more than 100 percent to total revenue in 2012.

Table XV

Insured Active and Retiree
Welfare Funds Reserves in Excess
of 100 Percent of Revenue

<u>Fund Name</u>	<u>Fund Reserves</u>	<u>Percentage of Reserves to Total Revenue</u>
Local 30 A-C Operating Municipal Engineers WF/RWF*	\$3,005,166	119.48%
Fire Alarm Dispatchers Benevolent Assoc WF*	513,406	110.08
NYC Deputy Sheriffs Assoc RWF*	67,999	107.10
Local 333 United Marine Division WF	457,563	105.54

* These funds also had reserves of more than 100 percent to total revenue in 2012.

For self-insured active and retiree welfare funds: using 200 percent of total annual revenue as a reasonable level for reserves, we identified 25 funds that had reserves in excess of this amount, which are listed in Table XVI. Twenty-two of the 25 funds also had reserves of more than 200 percent to total revenue in 2012.

Table XVI

Self-Insured Active and Retiree
Welfare Funds Reserves in Excess
of 200 Percent of Revenue

<u>Fund Name</u>	<u>Fund Reserves</u>	<u>Percentage of Reserves to Total Revenue</u>
Local 14 –14B IUOE WF/RWF*	\$1,169,380	810.76%
Local 15, 15A, 15C Operating Engineers WF/RWF*	5,091,536	804.81
NYC Muni. Steamfitters & Steamfitter Helpers WF*	1,543,397	780.57
NYC Muni. Steamfitters & Steamfitter Helpers RWF*	791,360	491.33
1199 SEIU Licensed Practical Nurses WF*	6,511,053	464.14
Local 3 IBEW Electricians WF*	7,370,038	426.43
Local No. 5 MNCPL Employees Benefit Trust Fund *	1,124,356	416.52
Local 211 Allied Building Inspectors WF*	8,519,999	356.17
Local 444 Sanitation Officers RWF*	15,861,610	350.15
Organization of Staff Analysts WF/RWF/ED*	35,951,440	336.62
NYC Municipal Plumbers & Pipefitters WF*	3,870,764	327.07
Doctors Council WF*	3,735,412	298.22
Doctors Council RWF*	2,307,236	295.47
Local 333 United Marine Division RWF*	915,577	289.33
Local 94 Uniformed Firefighters Assoc WF*	41,928,890	271.26
Local 444 Sanitation Officers WF*	5,026,963	263.75
Local 3 IBEW Electricians RWF*	3,974,967	259.96
Local 854 Uniformed Fire Officers Assoc WF*	10,192,950	258.95
New York City RWF*	17,741,491	247.24
Correction Captains Assoc WF/CLRF*	3,003,443	236.04
Local 246 SEIU RWF	3,969,737	224.87
Detectives Endowment Assoc WF *	18,887,154	212.67
New York State Nurses Assoc WF	31,429,038	212.49
Local 246 SEIU WF	4,852,005	210.66
Local 891 School Custodian & Engineers WF/RWF/ED	5,041,374	208.56

* These funds also had reserves of more than 200 percent to total revenue in 2012.

OPERATING DEFICITS

In 2013, 20 of the 64 (31 percent) active and retiree welfare funds in our analysis incurred operating deficits totaling \$14.0 million, as shown in Table XVII. The deficits ranged from \$5,479 to approximately \$2.7 million. One fund, Local 371 Social Service Employees WF/ED/Legal/ADM continued to deplete its reserves this year by 31.60 percent as of June 30, 2013, a 2-year decline of 48.9 percent from its June 30, 2011 fiscal year-end reserves of \$8,775,046.

Table XVII

Funds with Operating Deficits and Declining Reserves

<u>Fund Name</u>	2013 <u>Operating Deficit</u>	2013 <u>Reserves</u>	2012 <u>Reserves</u>	2012-2013 Percentage Decrease in <u>Reserves</u>
Local 831 Uniformed Sanitationmen's Assoc WF*	\$2,733,719	\$14,934,804	\$17,668,523	(15.47%)
Local 237 Teamsters WF*	2,617,795	46,924,877	46,940,190	(0.03)
Local 371 Social Service Employees WF/ED/Legal/ADM*	2,005,616	4,485,508	6,557,852	(31.60)
Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM	1,916,775	35,011,138	36,386,553	(3.78)
Detectives Endowment Assoc WF	1,133,950	18,887,154	19,899,497	(5.09)
Doctors Council WF*	644,323	3,735,412	4,379,735	(14.71)
Local 3 IBEW Electricians WF	519,833	7,370,038	8,058,078	(8.54)
Local 854 Uniformed Fire Officers Assoc WF*	497,264	10,192,950	10,690,214	(4.65)
Local 15, 15A, 15C Operating Engineers WF/RWF	407,332	5,091,536	5,498,868	(7.41)
1199 SEIU Licensed Practical Nurses WF*	339,228	6,511,053	6,850,281	(4.95)
Local 3 IBEW Electricians RWF	327,882	3,974,967	4,420,742	(10.08)
Doctors Council RWF*	289,076	2,307,236	2,596,312	(11.13)
DC 9 Painting Industry WF/RWF (Local 1969)*	184,897	2,000,288	2,185,185	(8.46)
NYC Municipal Plumbers & Pipefitters WF*	146,890	3,870,764	4,033,404	(4.03)
Local 891 School Custodian & Engineers WF/RWF/ED	112,233	5,041,374	5,121,554	(1.57)
NYC Muni. Steamfitters & Steamfitter Helpers WF	44,046	1,543,397	1,578,378	(2.22)
Local 306 Municipal Employees WF*	20,222	114,021	138,602	(17.73)
NYC Deputy Sheriffs Assoc RWF*	11,599	67,999	79,598	(14.57)
NYC Muni. Steamfitters & Steamfitter Helpers RWF	5,909	791,360	797,269	(0.74)
NYC Deputy Sheriffs Assoc WF	5,479	69,689	75,168	(7.29)
Total	\$13,964,068	\$172,925,565	\$183,956,003	(6.00%)

* These funds were also identified as incurring operating deficits and declining reserves in 2012.

We identified welfare funds that are either insolvent or have significantly low levels of reserves in relation to their total expenses. In identifying these funds, we considered the funds' year-end cash reserves, their 2013 years' operating results, and the ratios of their reserves to the funds' total expenses. Table XVIII identifies 14 funds that may have current or future solvency problems.

Table XVIII
Funds with Low Reserve Levels

<u>Fund Name</u>	<u>2013 Reserves</u>	<u>Excess of Revenue Over Expenses*</u>	<u>Percentage of Reserves to Total Expenses</u>
NYC Deputy Sheriffs Assoc RWF	\$67,999	(\$11,599)	90.56%
NYC Deputy Sheriffs Assoc WF**	69,689	(5,479)	44.48
Local 306 Municipal Employees WF**	114,021	(20,222)	107.11
Local 300 Civil Service Forum WF **	974,943	83,630	69.14
Civil Service Bar Assoc WF**	1,076,483	3,125	69.59
Local 1182 CWA Security Benefits Fund WF/RWF/Legal**	3,396,112	173,744	60.51
Local 371 Social Service Employees WF/ED/Legal/ADM**	4,485,508	(2,005,616)	15.63
Local 854 Uniformed Fire Officers Assoc RWF**	7,200,693	22,552	67.64
Correction Officers' Benevolent Assoc RWF**	10,423,944	1,573,221	86.66
Correction Officers' Benevolent Assoc WF/CLRF**	14,033,931	738,861	89.94
Professional Staff Congress CUNY WF/RWF**	23,054,167	3,442,143	51.88
Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM**	35,011,138	(1,916,775)	65.01
DC 37 WF**	206,445,551	7,542,424	87.39
Local 2 United Federation of Teachers WF/RWF**	252,388,840	14,186,310	91.49

* Negative \$ amounts indicate funds with operating deficits in 2013.

** Indicates funds whose expenses exceeded revenue in 2012.

High reserve levels may indicate that funds do not spend enough of their total annual revenue on benefits. Low reserve levels may point to excessive amounts of revenue spent on benefits and administrative expenses.

ANALYSIS OF TOTAL REVENUE

In 2013, the 64 welfare funds in our survey had revenue totaling \$1.09 billion. Expenses for these funds totaled \$1.04 billion — \$90.1 million for fund administration and \$949.5 million for benefits to members. The \$52.3 million surplus (revenues over expenses) increased the funds' reserves.

In previous sections, we analyzed the funds' usage of their total revenues. Table XIX identifies funds that, compared to averages for their categories, have high administrative costs and/or low benefit costs.

Table XIX

Self-Insured and Insured, Active and Retiree Welfare Funds with
High Administration Expenses and/or Low Benefit Expenses
as a Percentage of Total Revenue

<u>Fund Name</u>	<u>Total Revenue</u>	<u>Percentage of Administrative Expenses to Total Revenue</u>		<u>Percentage of Benefit Expenses to Total Revenue</u>	
		<u>Category Average</u>	<u>Fund</u>	<u>Category Average</u>	<u>Fund</u>
Local 237 Teamsters WF	\$35,749,066	8.22%	11.47%	89.73%	95.86%
Local 1 Council of Supervisors & Admin RWF*	12,506,490	6.54	10.16	79.12	76.98
Local 1 Council of Supervisors & Admin WF*	11,056,820	6.54	9.50	79.12	87.06
Local 831 Uniformed Sanitationmen's Assoc WF*	10,856,604	9.06	11.85	91.15	113.33
Organization of Staff Analysts WF/RWF/ED*	10,680,072	6.54	13.40	79.12	80.46
Local 1182 CWA Security Benefits Fund WF/RWF/Legal*	5,786,188	9.06	16.54	91.15	80.46
Local 891 School Custodian & Engineers WF/RWF/ED	2,417,208	13.97	21.44	87.93	83.21
Local 211 Allied Building Inspectors WF	2,392,107	13.97	6.36	87.93	59.78
Local 246 SEIU RWF	1,765,378	13.97	13.82	87.93	69.72
1199 SEIU Licensed Practical Nurses WF	1,402,816	13.97	20.78	87.93	103.40
Doctors Council WF*	1,252,563	13.97	25.12	87.93	126.32
United Probation Officers Assoc WF*	1,174,574	13.97	26.55	87.93	70.77
United Probation Officers Assoc RWF*	680,068	17.78	24.93	80.70	54.31
Local 15,15A,15C Operating Engineers WF/RWF*	632,637	17.78	30.73	80.70	133.66
Local 3 IBEW City Employees WF	595,103	17.78	5.87	80.70	45.33
Fire Alarm Dispatchers Benevolent Assoc WF*	466,414	10.38	11.53	90.37	71.11
Local 333 United Marine Division WF*	433,542	10.38	16.38	90.37	85.98
Local No. 5 MNCPL Employees Benefit Trust Fund *	269,939	17.78	7.71	80.70	26.60
Local 14 –14B IUOE WF/RWF	144,233	17.78	13.95	80.70	64.30
Local 306 Municipal Employees WF*	86,229	17.78	29.44	80.70	94.01

Boldface - fund had high administrative expenses and/or low benefit expenses in 2013.

* These funds also had high administrative expenses and/or low benefit expenses in 2012.

The basic objective of a welfare fund is to provide benefits to their members while keeping administrative costs to a minimum. Funds that accumulate excessive reserves or expend large amounts for administration at the expense of members' benefits do not achieve their basic objective. Therefore, the trustees of these funds should evaluate how they expend total revenue and best ensure that the objective of the welfare fund is met.

Funds Should Address Financial and Operating Issues to Ensure Maximum Use of Revenue and Continued Financial Solvency

In summary, we identified financial issues that, in our opinion, should be addressed by the fund management. Specifically, these include:

- Expenses that exceeded revenues, resulting in operating deficits. Operating deficits could deplete fund reserves, which could ultimately lead to insolvency.
- Administrative expenses that exceeded the averages for other funds in the same category. Reducing administrative expenses would provide funds to increase benefits for members.
- Operating surpluses that resulted in high reserves. Excess reserves may indicate that funds should increase members' benefits.

Fund managers have a fiduciary responsibility to their members. A fund that accumulates excessive reserves or expends large amounts for administrative costs is not achieving its basic goal of providing optimum benefits to members while achieving financial solvency. Accordingly, the trustees of the funds listed in Table XX should evaluate how fund resources could be better used.

Table XX (previously included in the Executive Summary) lists 10 funds with potential financial issues in 2013 that, in our opinion, should be addressed.

Table XX

**Funds with Potential Financial Problems Identified in this Report
(Problem Areas Highlighted)**

FUND	TOTAL REVENUE	OVERALL EXPENSES	SURPLUS OR OPERATING (DEFICIT)	BENEFITS EXPENSE		ADMINISTRATIVE EXPENSE		FUND BALANCE			CPA OPINIONS	RISK OF INSOLVENCY (SEE LEGEND)
				TOTAL	% OF REVENUE	TOTAL	% OF REVENUE	TOTAL	% OF REVENUE	BALANCE/ DEFICIT*		
Local 371 Social Service Employees WF/ED/Legal/ADM**	\$26,697,515	\$28,703,131	(\$2,005,616)	\$26,061,864	97.62%	\$2,641,267	9.89%	\$4,485,508	16.80%	-224	Unqualified	ST
Local 831 Uniformed Sanitationmen's Assoc WF	\$10,856,604	\$13,590,323	(\$2,733,719)	\$12,303,686	113.33%	\$1,286,637	11.85%	\$14,934,804	137.56%	-546	Unqualified	LT
Local 1182 CWA Security Benefits Fund WF/RWF/Legal**	\$5,786,188	\$5,612,444	\$173,744	\$4,655,602	80.46%	\$956,842	16.54%	\$3,396,112	58.69%	N/A	Qualified***	LT
Local 3 IBEW Electricians RWF	\$1,529,051	\$1,856,933	(\$327,882)	\$1,661,076	108.63%	\$195,857	12.81%	\$3,974,967	259.96%	-1212	Qualified***	N
1199 SEIU Licensed Practical Nurses WF	\$1,402,816	\$1,742,044	(\$339,228)	\$1,450,519	103.40%	\$291,525	20.78%	\$6,511,053	464.14%	-1919	Unqualified	N
Doctors Council WF**	\$1,252,563	\$1,896,886	(\$644,323)	\$1,582,270	126.32%	\$314,616	25.12%	\$3,735,412	298.22%	-580	Unqualified	N
Doctors Council RWF	\$780,870	\$1,069,946	(\$289,076)	\$899,658	115.21%	\$170,288	21.81%	\$2,307,236	295.47%	-798	Unqualified	N
NYC Deputy Sheriffs Assoc WF	\$151,210	\$156,689	(\$5,479)	\$152,789	101.04%	\$3,900	2.58%	\$69,689	46.09%	-1272	Unqualified	N
Local 306 Municipal Employees WF**	\$86,229	\$106,451	(\$20,222)	\$81,068	94.01%	\$25,383	29.44%	\$114,021	132.23%	-564	Unqualified	LT
NYC Deputy Sheriffs Assoc RWF	\$63,489	\$75,088	(\$11,599)	\$69,114	108.86%	\$5,974	9.41%	\$67,999	107.10%	-586	Unqualified	LT

Legend

N - Currently Not at Risk of Insolvency
 ST – Short-term Risk of Insolvency within 1 - 3 years
 LT - Long-term Risk of Insolvency greater than 3 years
 N/A – Not Applicable

* A ratio estimating the number of years that a fund can operate before being "in the red" if all factors remain constant. For example, number "-101" would indicate the fund has approximately one year before becoming insolvent.

** These funds were also cited for Potential Financial Problems in 2012.

*** See Table XXI where the specific issue for this fund with a "Qualified" opinion is detailed.

EXCEPTIONS ON FUND OPERATIONS

In accordance with Comptroller's Directive #12, each fund must annually engage an independent CPA to issue an opinion on financial statements prepared by the funds, and accompanying that opinion, the CPA must issue a management letter that comments the fund's management practices and internal control systems. In 2013, some of the management letters identified internal control issues that could affect the financial statements. Based on our review of the funds' financial statements, the opinions and management letters submitted by the CPAs and the booklets distributed by the funds describing their benefits, we found that a number of funds did not comply with certain aspects of Directive #12 and their agreements with the City.

CPA Opinions

As noted, CPAs audit, certify and render opinions on the funds' financial statements. The fund agreements between the City and the unions require the preparation of each fund's financial statements on the accrual basis of accounting and in conformity with GAAP. CPAs may render one of the following opinions:

<u>Opinion</u>	<u>Description</u>
Unqualified	Financial statements present fairly, in all material respects, the financial position, results of operations, and cash flows of the entity in conformity with generally accepted accounting principles.
Qualified	Except for the effects of the matter(s) to which the qualification relates, the financial statements present fairly, in all material respects, the financial position, results of operations, and cash flows of the entity in conformity with generally accepted accounting principles.
Adverse	Financial statements do not present fairly the financial position, results of operations, or cash flows of the entity in conformity with generally accepted accounting principles.
Disclaimer	The auditor does not express an opinion on the financial statements.

Seventy-five of the 90 funds reviewed received unqualified opinions. However, 15 funds received qualified opinions from independent auditors because the funds' independent CPAs concluded that each of the 15 financial statements were not presented in accordance with GAAP. In each case, this was because post-retirement and other benefit obligations must be presented on the fund's financial statements (see Table XXI).

Table XXI**Funds that Received Qualified Opinions or Disclaimers
from their Independent Auditors**

FUND	OPINION	INDEPENDENT AUDITOR COMENTS
Assistant Dep Wardens/Dep Wardens WF/RWF/CLRF	Qualified	Excludes postretirement benefit obligations.*
Correction Captains Assoc RWF	Qualified	Excludes postretirement benefit obligations.*
Correction Officers' Benevolent Assoc RWF	Qualified	Excludes postretirement benefit obligations.*
DC 37 WF	Qualified	Excludes postretirement benefit obligations.*
Detectives Endowment Assoc RWF	Qualified	Excludes postretirement benefit obligations.*
Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM	Qualified	Excludes postretirement benefit obligations.*
Local 1181 CWA Supervisory Employees WF/RWF	Qualified	Excludes postretirement benefit obligations.*
Local 1182 CWA Security Benefits Fund WF/RWF/Legal	Qualified	Excludes postretirement benefit obligations.*
Local 3 IBEW Electricians RWF	Qualified	Excludes postretirement benefit obligations.*
Local 300 Civil Service Forum RWF	Qualified	Excludes postretirement benefit obligations.*
Local 333 United Marine Division RWF	Qualified	Excludes postretirement benefit obligations.*
Local 891 School Custodian & Engineers WF/RWF/ED	Qualified	Excludes postretirement benefit obligations.*
Local 94 Uniformed Firefighters Assoc RWF	Qualified	Excludes postretirement benefit obligations.*
Organization of Staff Analysts WF/RWF/ED	Qualified	Excludes postretirement benefit obligations.*
United Probation Officers Assoc RWF	Qualified	Excludes postretirement benefit obligations.*

* As in 2012, these funds' financial statements received qualified opinions because they continued to exclude postretirement benefit obligations contrary to Government Accounting Standards Board Statement No. 43, Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans ("GASB No. 43").

Funds that received qualified opinions from their independent auditors should take immediate action to correct these problems.

Late Submission of Directive #12 Reports

In 2013, 46 of the 107 funds (43.0 percent) in our analysis failed to make timely submissions of their Directive #12 reports to the Comptroller's Office. Comptroller's Directive #12 requires that within nine months after the close of a fund's fiscal year, each fund's trustees must submit a report to the City Comptroller showing the fund's condition and affairs during its preceding fiscal year. Included in the fund's annual Directive #12 filing is an audited financial statement and a CPA-prepared management letter commenting upon internal and management controls that were assessed during the CPA audit. Further, Directive #12 also requires that each fund comment on management matters such as investment policies, bidding practices, staff utilization, and accounting allocations. The Directive #12 reports provide a basis for a comparative analysis of fund operations and for the identification of deviations from the norm.

Of the 46 late submissions:

- One fund submitted its Directive #12 reports in excess of two years after its due date – 35 months after its fiscal year-end.
- Fifteen funds submitted their Directive #12 reports between one and two years after their due dates – 21 to 33 months after their fiscal year-end.
- Eight funds submitted their Directive #12 reports between six months and one year after their due dates – 15 to 19 months after their fiscal year-end.
- One fund submitted its Directive #12 report between three and six months after its due dates – 12 months after its fiscal year-end.
- Twenty-one funds submitted their Directive #12 reports less than three months after their due dates.

Table XXII lists the 24 funds that submitted their Directive #12 reports in excess of six months after their due dates – 15 months or more after their fiscal year-end.

Table XXII

**Funds that Significantly Delayed
Submission of a Directive #12 Report**

<u>Fund Name</u>	<u>2012 Fiscal Year Ended</u>	<u>Directive #12 Due 9 months After the Fund's Fiscal-Year-End</u>	<u>Date Received</u>	<u>Number of Days Past Due</u>
<u>More than 2 years late: (1 Fund)</u>				
Local 3 IBEW City Employees WF*	05/31/13	02/28/14	05/04/16	796
<u>1 year - 2 years late: (15 Funds)</u>				
Local 306 Municipal Employees WF*	06/30/13	03/31/14	03/25/16	725
Fire Alarm Dispatchers Benevolent Assoc WF*	06/30/13	03/31/14	03/02/16	702
Local 831 Uniformed Sanitationmen's Assoc AF*	03/31/13	12/31/13	08/31/15	608
Local 831 Uniformed Sanitationmen's Assoc WF*	06/30/13	03/31/14	10/08/15	556
DC 9 Painting Industry WF/RWF (Local 1969)*	12/31/13	09/30/14	04/04/16	552
DC 9 Painting Industry AF (Local 1969)*	12/31/13	09/30/14	04/04/16	552
Sergeants Benevolent Assoc (Police)* WF/RWF/CLRF*	06/30/13	03/31/14	08/24/15	511
Sergeants Benevolent Assoc (Police) AF*	06/30/13	03/31/14	08/24/15	511
Local 831 Uniformed Sanitationmen's Assoc RWF*	09/30/13	06/30/14	09/08/15	435
Local 858 IBT, (OTB) Branch Office Managers WF*	03/31/13	12/31/13	03/11/15	435
Local 94 Uniformed Firefighters Assoc AF*	12/31/13	09/30/14	11/16/15	412
Local 1 Plumbing Industry AF*	12/31/13	09/30/14	10/15/15	380
NYC Muni.Steamfitters & Steamfitter Helpers RWF*	12/31/13	09/30/14	10/14/15	379
NYC Muni.Steamfitters & Steamfitter Helpers WF*	12/31/13	09/30/14	10/14/15	379
New York City RWF*	12/31/13	09/30/14	10/14/15	379
<u>6 months - 1 year late: (8 Funds)</u>				
NYC Municipal Plumbers & Pipefitters WF*	12/31/13	09/30/14	08/05/15	309
Local 891 School Custodian & Engineers WF/RWF/ED*	12/31/13	09/30/14	07/07/15	280
Local 891(IUOE) AF*	12/31/13	09/30/14	07/07/15	280
Committee of Interns and Residents ED*	06/30/13	03/31/14	12/09/14	253
Captains Endowment Assoc CLRF*	12/31/13	09/30/14	05/29/15	241
Local 94 Uniformed Firefighters Assoc WF*	06/30/13	03/31/14	11/24/14	238
Local 94 Uniformed Firefighters Assoc RWF*	06/30/13	03/31/14	11/24/14	238
Local 1181 CWA Supervisory Employees WF/RWF	07/31/13	04/30/14	11/19/14	203

* These funds also significantly delayed their Directive #12 submission in 2012.

Fund trustees and administrators have a contractual responsibility to submit their Directive #12 reports on time. The information generated as a result of a Directive #12 report provides a basis for our comparative analyses of fund operations to identify deviations from the norm. The timely release of this comparative analysis allows those funds that deviate from the norm to take corrective action and evaluate how fund resources could be better used.

CPAs Were Not Selected from Comptroller's Prequalified List

Directive #12 recommends that funds should only contract with CPA firms that are listed on the Comptroller's prequalified list. CPA firms on the prequalified list are registered with the New York State Education Department to practice in the State of New York and have had a peer review within the last three years. The peer review is performed to determine whether the firm's system of quality control for its accounting and auditing practice is designed to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects and whether it is in fact followed. The peer review must be conducted in accordance with American Institute of Certified Public Accountants (AICPA) Standards and the firm must receive a rating of *pass* or *pass with deficiencies*.

By contracting with a CPA firm on the Comptroller's prequalified list, the funds will have assurance that the CPA firm has had a system peer review and received a peer review rating of *pass*. Our review found that only 26 funds (24.3 percent) of the 107 funds that submitted a Directive #12 filing in 2013 selected a CPA firm on the Comptroller's prequalified list. (See Exhibit F for a list of the 81 funds that did not use a prequalified CPA firm.)

Eligibility Delay

The intent of the standard benefit fund agreements between the City and the unions is that welfare fund benefits be available during each member's entire period of employment with the City.

Specifically, the standard fund agreements between the City and the unions state:

The Union agrees to provide from the Fund for each Covered Employee the supplementary benefits described in the schedule annexed to this Agreement marked as Appendix 'C', for the period of employment with the City of each such Covered Employee during the term of this Agreement, whether or not any payment or payments made to the Union pursuant to the formula prescribed in section 2(c) of this Agreement actually included the full sum prescribed by Appendix 'B' on account of such Employee during the twenty-eight (28) day cycle for which such payment or payments are made.

Thus, funds should make their members eligible for benefits beginning on their first day of employment with the City.

However, as has been repeatedly noted in prior years' Welfare Fund Surveys, one fund (District Council 9 Painters Industry Welfare Fund) delays eligibility for its new members for 90 days.¹² Since 2007, OLR has advised this fund that its eligibility rules are not in compliance with the welfare fund agreement signed by the parties and that the fund must provide coverage effective on a member's first day of employment. However, in a telephone conversation with the fund's administrator on November 10, 2015, we confirmed that the fund continues to delay eligibility for its members. Consequently, members or their dependents who may need benefits during the fund waiting period cannot obtain them.

Consolidation of Professional Services

Most funds receiving City contributions enter into contracts with professionals for various types of services such as accounting-auditing and legal counsel. Many funds use the same professional service provider for similar services. One CPA firm, for example, Gould, Kobrick & Schlapp, provides accounting services for 15 different unions representing 29 separate funds. (Appendix D lists the funds using the same providers for similar professional services.)

Trustees of funds using the same providers for similar services may reduce their funds' administrative expenses by negotiating future contracts jointly.

¹² Our analysis focused on the delay to new employees enrolled in welfare benefit funds (active) because the members of retiree funds and annuity funds qualify to receive benefits once they leave active service.

CONCLUSIONS AND RECOMMENDATIONS

Administrative and Benefit Expenses

There continues to be a variance in administrative costs as a percentage of total revenue for funds in each category. Concurrently, some funds spend a significantly lower percentage of their revenue on benefits compared to other funds.

Recommendations

1. Trustees of funds with higher than average percentages of administrative costs as compared to total revenues and/or low percentages of benefit expenses as compared with their total revenues should reduce administrative expenses and/or increase benefits to members.
2. Trustees of funds that use the same professional service providers for similar services should consider jointly negotiating future contracts with these providers to reduce administrative expenses through economies of scale.

Reserves

Several funds have incurred operating deficits and maintain very low levels of reserves, which may indicate potential future solvency problems. Other funds continue to maintain extremely high levels of reserves.

Recommendations

3. Trustees of funds with low reserve levels should take steps to ensure that their funds remain solvent. To accomplish this goal, funds should seek to reduce administrative expenses. If this is not possible or does not provide sufficient funds to ensure solvency, the trustees should attempt to reduce costs associated with benefits.
4. Trustees of funds that have incurred operating deficits, particularly those with low reserve levels, should ensure that anticipated benefit and administrative expenses will not exceed projected total revenue.
5. Trustees of funds with high reserve levels, particularly those whose funds spend less than average amounts of their revenue on benefits, should consider enhancing their members' benefits.

Exceptions on Fund Operations

As in previous years, we identified various funds that do not comply with all aspects of their unions' agreements with the City and with Comptroller's Directive #12.

Recommendations

6. Trustees of funds are required to submit to the Comptroller's Office an annual report showing the fund's condition and affairs in accordance with Directive #12 and that submission must be filed within nine months after the close of a fund's fiscal year-end. Trustees should ensure that these filings are timely made in accordance with Directive #12.
7. Trustees of funds should consider contracting with CPAs that are listed on the Comptroller's prequalified list.
8. Trustees of funds that delay members' eligibility for benefits beyond their first day of employment must revise their fund's policy to comply with their union's welfare fund agreement with the City.
9. OLR should use the information in this report to ensure that the trustees of the funds correct the conditions cited in qualified opinions received from their independent accountants.
10. OLR should consider withholding City contributions from delinquent funds that failed to submit their Directive #12 reports to the Comptroller's Office or fail to otherwise abide by the terms of that Directive and/or their Welfare Fund Agreements with the City.
11. OLR should recover the portion of City contributions from those funds that do not provide benefits to members from their first day of employment.

2013 SCHEDULE OF OFFICIAL FUND NAMES

<u>Name of Fund Used in this Report</u>	<u>Official Name of Fund</u>
1199 SEIU Licensed Practical Nurses WF	1199 SEIU Licensed Practical Nurses Welfare Fund
Assistant Dep Wardens/Dep Wardens AF	Assistant Deputy Wardens/Deputy Wardens Association Annuity Fund
Assistant Dep Wardens/Dep Wardens WF/RWF/CLRF	Assistant Deputy Wardens/Deputy Wardens Association Security Benefit Fund
Civil Service Bar Assoc AF	Civil Service Bar Association Annuity Trust Fund
Civil Service Bar Assoc WF	Civil Service Bar Association Security Benefits Fund
* Committee of Interns and Residents ED	House Staff Benefits Plan of CIR - Committee of Interns and Residents Professional Education Plan (PEP)
Correction Captains Assoc AF	Correction Captains Association Annuity Fund
Correction Captains Assoc RWF	Correction Captains Association Security Benefits Fund - Retirees
Correction Captains Assoc WF/CLRF	Correction Captains Association Security Benefits Fund/Civil Legal Representation Fund
Correction Officers' Benevolent Assoc AF	Correction Officers' Benevolent Association Annuity Fund
Correction Officers' Benevolent Assoc RWF	Correction Officers' Benevolent Association Security Benefits Fund – Retirees
Correction Officers' Benevolent Assoc WF/CLRF	Correction Officers' Benevolent Association Security Benefits Fund – Actives
Council of Supervisors and Administrators AF	CSA Compensation Accrual Fund
DC 37 AFSCME AF	District Council 37 AFSCME Annuity Fund Plan
DC 37 WF	District Council 37 Benefits Fund Trust and Affiliated Funds
* DC 9 Painting Industry AF (Local 1969)	Painting Industry Annuity Fund
DC 9 Painting Industry WF/RWF (Local 1969)	Painting Industry Insurance Fund and Subsidiary
Detectives Endowment Assoc AF	Detectives' Endowment Association Annuity Fund
* Detectives Endowment Assoc CLRF	Detectives' Endowment Association Civil Legal Representation Fund
Detectives Endowment Assoc RWF	Detectives' Endowment Association Health Benefits Fund – Retirees
Detectives Endowment Assoc WF	Detectives' Endowment Association Health Benefits Fund
Doctors Council AF	Doctors Council Annuity Fund
Doctors Council RWF	Doctors Council Retiree Welfare Fund
Doctors Council WF	Doctors Council Welfare Fund
* Fire Alarm Dispatchers Benevolent Assoc WF	Fire Alarm Dispatchers' Benevolent Association, Inc. - Welfare Fund
House Staff Comm of Interns & Residents WF/Legal	House Staff Benefits Plan of the Committee of Interns and Residents

FUND ABBREVIATIONS:

ADM-Administrative; AF-Annuity; Assoc-Association; CLRF-Civil Legal Representation; ED-Education; Legal-Legal Benefits; RWF-Retirees Welfare; and WF-Welfare.

2013 SCHEDULE OF OFFICIAL FUND NAMES

<u>Name of Fund Used in this Report</u>	<u>Official Name of Fund</u>
Local 1 Council of Supervisors & Admin RWF	CSA Retiree Welfare Fund
Local 1 Council of Supervisors & Admin WF	CSA Welfare Fund
* Local 1 Plumbing Industry AF	Plumbers Local Union No. 1 Additional Security Benefit Fund
Local 1180 CWA Members AF	Communications Workers of America Local 1180 Members' Annuity Fund
Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM	CWA Local 1180 Security Benefit Fund/Retirees Benefits Fund/Legal Benefits Fund/Education Fund/Administrative
Local 1181 CWA Supervisory Employees WF/RWF	CWA Local 1181 Security Benefits Fund
Local 1182 CWA Security Benefits Fund WF/RWF/Legal	CWA Local 1182 & Local 1183 Security Benefits Fund
* Local 1199 Nat Ben Fund Hosp Health Care WF/RWF	1199 SEIU National Benefit Fund for Health and Human Service Employees
Local 14 –14B IUOE WF/RWF	International Union of Operating Engineers Local 14 –14B Welfare Fund City of NY Employees
Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF	Annuity Trust Fund For the Municipal Employees of the Operating Engineers Union Local 15, 15A, 15C
Local 15, 15A, 15C Operating Engineers WF/RWF	International Union of Operating Engineers Local Unions 15, 15A, 15C Municipal Employees Welfare Fund
Local 2 United Federation of Teachers WF/RWF	United Federation of Teachers Welfare Fund
Local 211 Allied Building Inspectors WF	Allied Building Inspectors Local Union No. 211 I.U.O.E Welfare Fund
Local 237 Teamsters AF	Teamsters Local 237 Additional Security Benefit Fund
Local 237 Teamsters RWF	Teamsters Local 237 Retirees' Benefit Fund
Local 237 Teamsters WF	Teamsters Local 237 Welfare Fund
Local 246 SEIU NYC AF	New York City, Local 246, S.E.I.U. Annuity Fund
Local 246 SEIU RWF	New York City Local 246 Retiree Welfare Fund
Local 246 SEIU WF	New York City Local 246 Welfare Fund
Local 3 IBEW City Employees WF	City Employees Welfare Fund Local Union # 3 IBEW
Local 3 IBEW Communications Electricians AF	IBEW Local 3 NYC Communications Electricians Annuity Plan
* Local 3 IBEW Electrical Workers Industry AF	Annuity Plan of the Electrical Industry
Local 3 IBEW Electricians RWF	IBEW Local 3 NYC Electrical Division Health & Welfare Fund – Retired
Local 3 IBEW Electricians WF	IBEW Local 3 NYC Electrical Division Health & Welfare Fund – Active
Local 30 A-C Operating Municipal Engineers WF/RWF	Operating Engineers Union Local 30 Municipal Employees Welfare Trust Fund
Local 30 A-D IUOE Engineers AF	International Union of Operating Engineers Local 30 City Employees Annuity Fund

FUND ABBREVIATIONS:

ADM-Administrative; AF-Annuity; Assoc-Association; CLRF-Civil Legal Representation; ED-Education; Legal-Legal Benefits; RWF-Retirees Welfare; and WF-Welfare.

2013 SCHEDULE OF OFFICIAL FUND NAMES

<u>Name of Fund Used in this Report</u>	<u>Official Name of Fund</u>
Local 300 Civil Service Forum RWF	Local 300 SEIU, AFL-CIO Civil Service Forum Retired Employees' Welfare Fund
Local 300 Civil Service Forum WF	Local 300 SEIU, AFL-CIO Civil Service Forum Active Employees' Welfare Fund
Local 300 SEIU Civil Service Forum AF	Service Employees International Union, Local 300 Civil Service Forum Annuity Fund
Local 306 Municipal Employees WF	Local 306 Health and Welfare Fund for Municipal Workers
Local 333 United Marine Division RWF	Local 333 Insurance Fund for N.Y.C. Retirees
Local 333 United Marine Division WF	Local 333 Insurance Fund for N.Y.C. Employees
Local 371 Social Service Employees AF	Social Service Employees Union Local 371 Annuity Fund
Local 371 Social Service Employees WF/ED/Legal/ADM	Social Service Employees Union Local 371 Welfare Fund/Educational/Legal/Administrative
* Local 40 Iron Workers AF	Iron Workers Locals 40, 361 and 417 Annuity Fund
* Local 40 Iron Workers WF	Iron Workers Locals 40, 361 & 417 Health Fund
Local 444 Sanitation Officers AF	Local 444 Sanitation Officers' Compensation Accrual Fund
Local 444 Sanitation Officers RWF	Local 444 Sanitation Officers' Retirees Welfare Fund
Local 444 Sanitation Officers Supplemental AF	Local 444 Sanitation Officers' Supplemental Annuity Fund
Local 444 Sanitation Officers WF	Local 444 Sanitation Officers' Security Benefits Fund
Local 831 Uniformed Sanitationmen's Assoc AF	Uniformed Sanitationmen's Association Compensation Accrual Fund
Local 831 Uniformed Sanitationmen's Assoc RWF	Uniformed Sanitationmen's Association Retirees' Welfare Fund
Local 831 Uniformed Sanitationmen's Assoc WF	Uniformed Sanitationmen's Association Security Benefits Fund
Local 854 Uniformed Fire Officers Assoc AF	Uniformed Fire Officers Association Annuity Fund
Local 854 Uniformed Fire Officers Assoc RWF	Uniformed Fire Officers Association Retired Fire Officers Family Protection Plan
Local 854 Uniformed Fire Officers Assoc WF	Uniformed Fire Officers Association Family Protection Plan
* Local 858 IBT, (OTB) Branch Office Managers WF	Local 858 I.B. of T. Branch Office Managers (O.T.B.) Welfare Fund
Local 891 School Custodian & Engineers WF/RWF/ED	Local 891 International Union of Operating Engineers, School Custodians and School Custodian Engineers Welfare Fund
Local 891(IUOE) AF	International Union of Operating Engineers, Local 891 Annuity Fund
Local 94 Uniformed Firefighters Assoc AF	Compensation Accrual Fund of the Uniformed Firefighters Association and Subsidiary
Local 94 Uniformed Firefighters Assoc RWF	Retired Firefighters Security Benefit Fund of the Uniformed Firefighters Association
Local 94 Uniformed Firefighters Assoc WF	Security Benefit Fund of the Uniformed Firefighters Association
Local No. 5 MNCPL Employees Benefit Trust Fund	Local No. 5 Municipal Employees Benefit Trust Fund

FUND ABBREVIATIONS:

ADM-Administrative; AF-Annuity; Assoc-Association; CLRF-Civil Legal Representation; ED-Education; Legal-Legal Benefits; RWF-Retirees Welfare; and WF-Welfare.

2013 SCHEDULE OF OFFICIAL FUND NAMES

<u>Name of Fund Used in this Report</u>	<u>Official Name of Fund</u>
* NYC DC of Carpenters AF	New York City District Council of Carpenters Annuity Fund
* NYC DC of Carpenters WF/RWF	New York City District Council of Carpenters Welfare Fund
NYC Deputy Sheriffs Assoc AF	New York City Deputy Sheriffs Association Annuity Fund
NYC Deputy Sheriffs Assoc RWF	New York City Deputy Sheriffs Association Security Benefits Fund Retirees
NYC Deputy Sheriffs Assoc WF	New York City Deputy Sheriffs Association Security Benefits Fund
NYC Muni. Steamfitters & Steamfitter Helpers RWF	New York City Municipal Steamfitters and Steamfitter Helpers Retirees Health and Welfare Fund
NYC Muni. Steamfitters & Steamfitter Helpers WF	New York City Municipal Steamfitters and Steamfitter Helpers Health and Welfare Fund
NYC Municipal Plumbers & Pipefitters WF	New York City Municipal Plumbers and Pipefitters Health and Welfare Fund
New York City RWF	New York City Retirees Benefits Fund
* NYS Court Clerks Assoc RWF	New York State Court Clerks Association Retirees' Security Benefits Fund
* NYS Court Officers Assoc RWF	New York State Court Officers Association Security Benefit Fund
New York State Nurses Assoc WF	New York State Nurses Association Welfare Plan for New York City Employed Registered Professional Nurses
Organization of Staff Analysts WF/RWF/ED	Organization of Staff Analysts Welfare and Education Funds
Patrolmen's Benevolent Assoc AF	Annuity Fund of the Patrolmen's Benevolent Association of the City of New York
Patrolmen's Benevolent Assoc RWF	Retiree Health and Welfare Fund of the Patrolmen's Benevolent Association of the City of New York
Patrolmen's Benevolent Assoc WF/CLRF	Health and Welfare Fund of the Patrolmen's Benevolent Association of the City of New York
* Pavers & Road Builders District Council WF	Pavers and Road Builders District Council AFL-CIO Welfare Fund
Professional Staff Congress CUNY WF/RWF	PSC - CUNY Welfare Fund
Sergeants Benevolent Assoc (Police) AF	Sergeants Benevolent Association of the City of New York, Inc. Annuity Fund
Sergeants Benevolent Assoc (Police) WF/RWF/CLRF	Sergeants Benevolent Association of the City of New York, Inc. Health and Welfare Fund/CLRF
Superior Officers Council (Police) AF	Superior Officers Council Annuity Trust Fund
Superior Officers Council (Police) RWF	Superior Officers Council Retiree Health and Welfare Fund
Superior Officers Council (Police) WF/CLRF	Superior Officers Council Health and Welfare Fund/Civil Legal Representation Fund
* Surrogates & Supreme Court Reporters Assoc RWF	Welfare Fund of the Retirees of the Association of Surrogate's and Supreme Court Reporters within the City of New York
* UFT Albert Shanker College Scholarship Fund	Albert Shanker College Scholarship Fund of the United Federation of Teachers
United Probation Officers Assoc RWF	United Probation Officers Association Retirement Welfare Fund
United Probation Officers Assoc WF	United Probation Officers Association Welfare Fund

FUND ABBREVIATIONS:

ADM-Administrative; AF-Annuity; Assoc-Association; CLRF-Civil Legal Representation; ED-Education; Legal-Legal Benefits; RWF-Retirees Welfare; and WF-Welfare.

2013 SCHEDULE OF FINANCIAL DATA

NAME OF FUND	REF	NUMBER OF NYC MEMBERS	NYC CONTRIBUTION REVENUE	OTHER REVENUE	TOTAL REVENUE	BENEFIT EXPENSES	ADMIN EXPENSES	TOTAL EXPENSES	EXCESS OF REVENUE OVER EXPENSES	FUND BALANCE	FUND BAL/ TOTAL REV	DEVIATION FROM CAT. AVERAGE
SELF-INSURED WF & RWF												
NYC CONTRIBUTION UP TO \$1 MILLION												
Local 306 Municipal Employees WF	56	51	\$86,224	\$5	\$86,229	\$81,068	\$25,383	\$106,451	-\$20,222	\$114,021	132%	-58.42%
Local No. 5 MNCPL Employees Benefit Trust Fund	84	N/A	\$126,244	\$143,695	\$269,939	\$71,812	\$20,819	\$92,631	\$177,308	\$1,124,356	417%	30.97%
Local 14 -14B IUOE WF/RWF	37	84	\$140,136	\$4,097	\$144,233	\$92,741	\$20,115	\$112,856	\$31,377	\$1,169,380	811%	154.93%
NYC Muni. Steamfitters & Steamfitter Helpers RWF	87	100	\$149,253	\$11,812	\$161,065	\$146,516	\$20,458	\$166,974	-\$5,909	\$791,360	491%	54.49%
NYC Muni. Steamfitters & Steamfitter Helpers WF	86	140	\$196,199	\$1,527	\$197,726	\$214,265	\$27,507	\$241,772	-\$44,046	\$1,543,397	781%	145.44%
Local 333 United Marine Division RWF	59	191	\$316,253	\$190	\$316,443	\$228,749	\$62,996	\$291,745	\$24,698	\$915,577	289%	-9.02%
Local 3 IBEW City Employees WF	48	218	\$363,019	\$232,084	\$595,103	\$269,779	\$34,933	\$304,712	\$290,391	\$1,123,852	189%	-40.62%
Local 15, 15A, 15C Operating Engineers WF/RWF	38	302	\$498,247	\$134,390	\$632,637	\$845,585	\$194,384	\$1,039,969	-\$407,332	\$5,091,536	805%	153.06%
United Probation Officers Assoc RWF	110	388	\$674,698	\$5,370	\$680,068	\$369,314	\$169,536	\$538,850	\$141,218	\$597,706	88%	-72.36%
Assistant Dep Wardens/Dep Wardens WF/RWF/CLRF	2	540	\$782,468	\$29,386	\$811,854	\$706,947	\$111,854	\$818,801	-\$6,947	\$1,605,839	198%	-37.81%
Local 300 Civil Service Forum RWF	54	483	\$795,159	\$206,740	\$1,001,899	\$764,076	\$186,823	\$950,899	\$51,000	\$1,673,721	167%	-47.47%
Doctors Council RWF	21	511	\$796,026	-\$15,156	\$780,870	\$899,658	\$170,288	\$1,069,946	-\$289,076	\$2,307,236	295%	-7.09%
TOTAL UP TO \$1 MILLION CATEGORY	12	FUNDS:	\$4,923,926	\$754,140	\$5,678,066	\$4,690,510	\$1,045,096	\$5,735,606	-\$57,540	\$18,057,981	318%	
NYC CONTRIBUTION \$1 TO \$3 MILLION												
NYC Municipal Plumbers & Pipefitters WF	85	640	\$1,017,984	\$165,477	\$1,183,461	\$1,222,456	\$107,895	\$1,330,351	-\$146,890	\$3,870,764	327%	100.74%
United Probation Officers Assoc WF	109	672	\$1,157,316	\$17,258	\$1,174,574	\$831,293	\$311,908	\$1,143,201	\$31,373	\$1,269,919	108%	-33.64%
Correction Captains Assoc WF/CLRF	6/6.1	774	\$1,157,469	\$114,967	\$1,272,436	\$1,039,397	\$114,351	\$1,153,748	\$118,688	\$3,003,443	236%	44.87%
Local 1181 CWA Supervisory Employees WF/RWF	32	707	\$1,165,461	\$32,370	\$1,197,831	\$895,504	\$180,400	\$1,075,904	\$121,927	\$1,299,161	108%	-65.90%
Doctors Council WF	22	865	\$1,273,773	-\$21,210	\$1,252,563	\$1,582,270	\$314,616	\$1,896,886	-\$644,323	\$3,735,412	298%	83.04%
DC 9 Painting Industry WF/RWF (Local 1969)	20	859	\$1,434,522	\$25,717	\$1,460,239	\$1,515,708	\$129,428	\$1,645,136	-\$184,897	\$2,000,288	137%	-15.93%
Local 300 Civil Service Forum WF	55	891	\$1,452,847	\$40,923	\$1,493,770	\$1,207,946	\$202,194	\$1,410,140	\$83,630	\$974,943	65%	-59.94%
Local 3 IBEW Electricians RWF	50	900	\$1,464,525	\$64,526	\$1,529,051	\$1,661,076	\$195,857	\$1,856,933	-\$327,882	\$3,974,967	260%	59.55%
Civil Service Bar Assoc WF	3	910	\$1,498,329	\$51,769	\$1,550,098	\$1,316,198	\$230,775	\$1,546,973	\$3,125	\$1,076,483	69%	-57.38%
1199 SEIU Licensed Practical Nurses WF	68	942	\$1,521,728	-\$118,912	\$1,402,816	\$1,450,519	\$291,525	\$1,742,044	-\$339,228	\$6,511,053	464%	184.87%
Local 3 IBEW Electricians WF	51	1,009	\$1,630,130	\$98,191	\$1,728,321	\$2,013,700	\$234,454	\$2,248,154	-\$519,833	\$7,370,038	426%	161.72%
Local 211 Allied Building Inspectors WF	42	1,001	\$1,639,540	\$752,567	\$2,392,107	\$1,430,045	\$152,078	\$1,582,123	\$809,984	\$8,519,999	356%	118.60%
Local 246 SEIU RWF	46	1,018	\$1,654,322	\$111,056	\$1,765,378	\$1,230,909	\$244,021	\$1,474,930	\$290,448	\$3,969,737	225%	38.01%
Local 444 Sanitation Officers WF	65	1,260	\$1,675,032	\$230,936	\$1,905,968	\$1,431,319	\$125,230	\$1,556,549	\$349,419	\$5,026,963	264%	61.88%
Local 246 SEIU WF	47	1,330	\$2,187,723	\$115,546	\$2,303,269	\$1,720,396	\$320,115	\$2,040,511	\$262,758	\$4,852,005	211%	29.29%
Local 891 School Custodian & Engineers WF/RWF/ED	80	1,381	\$2,340,085	\$77,123	\$2,417,208	\$2,011,267	\$518,174	\$2,529,441	-\$112,233	\$5,041,374	209%	28.01%
Correction Captains Assoc RWF	5	1,684	\$2,515,121	\$163,570	\$2,678,691	\$2,070,241	\$164,869	\$2,235,110	\$443,581	\$4,364,425	163%	0.00%
TOTAL \$1 TO \$3 MILLION CATEGORY	17	FUNDS:	\$26,785,907	\$1,921,874	\$28,707,781	\$24,630,244	\$3,837,890	\$28,468,134	\$239,647	\$66,860,974	233%	
NYC CONTRIBUTION \$3 TO \$10 MILLION												
Local 444 Sanitation Officers RWF	64	2,846	\$3,448,126	\$1,081,825	\$4,529,951	\$3,575,848	\$256,410	\$3,832,258	\$697,693	\$15,861,610	350%	115.03%
Local 854 Uniformed Fire Officers Assoc WF	77	2,425	\$4,101,711	-\$165,379	\$3,936,332	\$4,233,729	\$199,867	\$4,433,596	-\$497,264	\$10,192,950	259%	59.02%
Superior Officers Council (Police) WF/CLRF	106	2,678	\$4,209,977	\$16,619	\$4,226,596	\$3,732,696	\$394,338	\$4,127,034	\$99,562	\$4,641,298	110%	-32.56%
House Staff Comm of Interns & Residents WF/Legal	24	2,141	\$5,139,729	\$703,680	\$5,843,409	\$5,843,409	\$576,256	\$5,437,106	\$406,303	\$8,591,382	147%	-9.71%
Local 1182 CWA Security Benefits Fund WF/RWF/Legal	33	3,507	\$5,566,899	\$219,289	\$5,786,188	\$4,655,602	\$956,842	\$5,612,444	\$173,744	\$3,396,112	59%	-63.96%
New York City RWF	89	4,562	\$7,207,644	-\$31,725	\$7,175,919	\$6,128,113	\$433,904	\$6,562,017	\$613,902	\$17,741,491	247%	51.83%
Local 854 Uniformed Fire Officers Assoc RWF	78	4,766	\$7,620,272	\$3,047,672	\$10,667,944	\$9,923,339	\$722,053	\$10,645,392	\$22,552	\$7,200,693	67%	-58.55%
Detectives Endowment Assoc WF	16	5,297	\$7,897,141	\$983,983	\$8,881,124	\$9,067,928	\$947,146	\$10,015,074	-\$1,133,950	\$18,887,154	213%	30.60%
Superior Officers Council (Police) RWF	105	5,128	\$8,005,099	\$24,796	\$8,029,895	\$6,359,412	\$704,322	\$7,063,734	\$966,161	\$12,431,176	155%	-4.93%
Local 831 Uniformed Sanitationmen's Assoc WF	73	6,100	\$9,965,204	\$891,400	\$10,856,604	\$12,303,686	\$1,286,637	\$13,590,323	-\$2,733,719	\$14,934,804	138%	-15.52%
TOTAL \$3 TO \$10 MILLION CATEGORY	10	FUNDS:	\$63,161,802	\$6,772,160	\$69,933,962	\$64,841,203	\$6,477,775	\$71,318,978	-\$1,385,016	\$113,878,670	163%	

2013 SCHEDULE OF FINANCIAL DATA

NAME OF FUND	REF	NUMBER OF NYC MEMBERS	NYC CONTRIBUTION REVENUE	OTHER REVENUE	TOTAL REVENUE	BENEFIT EXPENSES	ADMIN EXPENSES	TOTAL EXPENSES	EXCESS OF REVENUE OVER EXPENSES	FUND BALANCE	FUND BAL/ TOTAL REV	DEVIATION FROM CAT. AVERAGE
<u>SELF-INSURED WF & RWF (continued)</u>												
<u>NYC CONTRIBUTION \$10 TO \$20 MILLION</u>												
Local 1 Council of Supervisors & Admin WF	25	6,056	\$10,352,922	\$703,898	\$11,056,820	\$9,626,144	\$1,050,560	\$10,676,704	\$380,116	\$12,755,656	115%	-29.88%
Organization of Staff Analysts WF/RWF/ED	93	6,686	\$11,059,228	-\$379,156	\$10,680,072	\$8,592,813	\$1,430,692	\$10,023,505	\$656,567	\$35,951,440	337%	106.72%
Local 1 Council of Supervisors & Admin RWF	26	7,570	\$11,410,442	\$1,096,048	\$12,506,490	\$9,627,569	\$1,270,541	\$10,898,110	\$1,608,380	\$20,563,733	164%	-0.07%
Local 94 Uniformed Firefighters Assoc WF	83	7,730	\$12,152,229	\$3,305,018	\$15,457,247	\$11,085,482	\$731,056	\$11,816,538	\$3,640,709	\$41,928,890	271%	64.86%
Correction Officers' Benevolent Assoc RWF	7	7,678	\$12,607,184	\$993,940	\$13,601,124	\$11,445,013	\$582,890	\$12,027,903	\$1,573,221	\$10,423,944	77%	-53.42%
New York State Nurses Assoc WF	92	8,083	\$13,044,692	\$1,746,411	\$14,791,103	\$9,823,839	\$845,807	\$10,669,646	\$4,121,457	\$31,429,038	212%	29.14%
Local 831 Uniformed Sanitationmen's Assoc RWF	72	7,400	\$14,645,969	\$3,542,343	\$18,188,312	\$12,152,238	\$589,483	\$12,741,721	\$5,446,591	\$21,686,564	119%	-27.53%
Correction Officers' Benevolent Assoc WF/CLRF	9	8,195	\$15,724,628	\$618,434	\$16,343,062	\$14,969,643	\$634,558	\$15,604,201	\$738,861	\$14,033,931	86%	-47.81%
Local 237 Teamsters RWF	44	2,138	\$17,234,894	\$4,100,612	\$21,335,506	\$17,570,357	\$1,663,472	\$19,233,829	\$2,101,677	\$34,845,417	163%	-0.74%
Local 94 Uniformed Firefighters Assoc RWF	81	10,397	\$17,731,942	\$11,305,427	\$29,037,369	\$24,094,499	\$781,823	\$24,876,322	\$4,161,047	\$42,937,735	148%	-10.13%
Detectives Endowment Assoc RWF	15	11,751	\$18,003,387	\$4,478,264	\$22,481,651	\$17,945,642	\$1,477,571	\$19,423,213	\$3,058,438	\$38,623,149	172%	4.41%
TOTAL \$10 TO \$20 MILLION CATEGORY	11 FUNDS:		\$153,967,517	\$31,511,239	\$185,478,756	\$146,933,239	\$11,058,453	\$157,991,692	\$27,487,064	\$305,179,497	165%	
<u>NYC CONTRIBUTION MORE THAN \$20 MILLION</u>												
Sergeants Benevolent Assoc (Police) WF/RWF/CLRF	113	12,162	\$20,138,117	\$611,803	\$20,749,920	\$17,714,184	\$1,124,836	\$18,839,020	\$1,910,900	\$24,489,066	118%	-28.27%
Local 371 Social Service Employees WF/ED/Legal/ADM	62	16,296	\$26,573,544	\$123,971	\$26,697,515	\$26,061,864	\$2,641,267	\$28,703,131	-\$2,005,616	\$4,485,508	17%	-80.28%
Local 237 Teamsters WF	45	7,492	\$32,018,813	\$3,730,253	\$35,749,066	\$34,268,218	\$4,098,643	\$38,366,861	-\$2,617,795	\$46,924,877	131%	54.09%
Patrolmen's Benevolent Assoc WF/CLRF	97	23,303	\$36,819,151	\$331,869	\$37,151,020	\$32,351,953	\$3,412,880	\$35,764,833	\$1,386,187	\$44,463,194	120%	40.49%
Patrolmen's Benevolent Assoc RWF	96	24,207	\$38,269,180	\$6,208,067	\$44,477,247	\$37,318,010	\$3,227,938	\$40,545,948	\$3,931,299	\$42,926,009	97%	13.29%
Professional Staff Congress CUNY WF/RWF	101	20,426	\$47,195,166	\$687,960	\$47,883,126	\$42,576,876	\$1,864,107	\$44,440,983	\$3,442,143	\$23,054,167	48%	-43.48%
Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM	30	14,640	\$48,759,395	\$3,178,782	\$51,938,177	\$48,953,308	\$4,901,644	\$53,854,952	-\$1,916,775	\$35,011,138	67%	-20.87%
DC 37 WF	10	149,618	\$225,971,756	\$17,801,564	\$243,773,320	\$211,779,431	\$24,451,465	\$236,230,896	\$7,542,424	\$206,445,551	85%	-0.59%
Local 2 United Federation of Teachers WF/RWF	41	173,057	\$286,335,808	\$3,705,131	\$290,040,939	\$254,293,956	\$21,560,673	\$275,854,629	\$14,186,310	\$252,388,840	87%	2.15%
TOTAL MORE THAN \$20 MILLION CATEGORY	9 FUNDS:		\$762,080,930	\$36,379,400	\$798,460,330	\$705,317,800	\$67,283,453	\$772,601,253	\$25,859,077	\$680,188,350	85%	
TOTAL SELF-INSURED FUNDS	59 FUNDS:		\$1,010,920,082	\$77,338,813	\$1,088,258,895	\$946,392,067	\$89,702,667	\$1,036,115,663	\$52,143,232	\$1,184,165,472	109%	
<u>INSURED WF & RWF</u>												
<u>NYC CONTRIBUTION UP TO \$3 MILLION</u>												
NYC Deputy Sheriffs Assoc RWF	12	40	\$58,464	\$5,025	\$63,489	\$69,114	\$5,974	\$75,088	-\$11,599	\$67,999	107%	-5.50%
NYC Deputy Sheriffs Assoc WF	13	105	\$151,208	\$2	\$151,210	\$152,789	\$3,900	\$156,689	-\$5,479	\$69,689	46%	-59.33%
Fire Alarm Dispatchers Benevolent Assoc WF	23	N/A	\$338,177	\$128,237	\$466,414	\$331,676	\$53,795	\$385,471	\$80,943	\$513,406	110%	-2.87%
Local 333 United Marine Division WF	60	280	\$426,831	\$6,711	\$433,542	\$372,761	\$71,021	\$443,782	-\$10,240	\$457,563	106%	-6.87%
Local 30 A-C Operating Municipal Engineers WF/RWF	57	1,501	\$2,498,713	\$16,543	\$2,515,256	\$2,133,968	\$302,196	\$2,436,164	\$79,092	\$3,005,166	119%	5.42%
TOTAL UP TO \$3 MILLION CATEGORY	5 FUNDS:		\$3,473,393	\$156,518	\$3,629,911	\$3,060,308	\$436,886	\$3,497,194	\$132,717	\$4,113,823	113%	
TOTAL SELF-INSURED AND INSURED FUNDS	64 FUNDS:		\$1,014,393,475	\$77,495,331	\$1,091,888,806	\$949,452,375	\$90,139,553	\$1,039,612,857	\$52,275,949	\$1,188,279,295	109%	

2013 SCHEDULE OF FINANCIAL DATA

NAME OF FUND	REF	NUMBER OF NYC MEMBERS	NYC CONTRIBUTION REVENUE	OTHER REVENUE	TOTAL REVENUE	BENEFIT EXPENSES	ADMIN EXPENSES	TOTAL EXPENSES	EXCESS OF REVENUE OVER EXPENSES	FUND BALANCE	FUND BAL/ TOTAL REV	DEVIATION FROM CAT. AVERAGE
ANNUITY FUNDS												
NYC CONTRIBUTION UP TO \$1 MILLION												
Assistant Dep Wardens/Dep Wardens AF	1	280	\$131,566	\$1,560,810	\$1,692,376	\$340,355	\$82,194	\$422,549	\$1,269,827	\$8,114,836	479%	-27.43%
NYC Deputy Sheriffs Assoc AF	11	114	\$146,180	\$159,402	\$305,582	\$58,080	\$0	\$58,080	\$247,502	\$1,648,202	539%	-18.37%
Civil Service Bar Assoc AF	130	882	\$445,624	\$266,116	\$711,740	\$309,383	\$53,593	\$362,976	\$348,764	\$4,458,720	626%	-5.19%
Local 3 IBEW Communications Electricians AF	127	54	\$513,016	\$267,497	\$780,513	\$270,842	\$33,884	\$304,726	\$475,787	\$6,340,851	812%	22.95%
Local 444 Sanitation Officers Supplemental AF	133	2,096	\$626,437	\$254,870	\$881,307	\$529,354	\$69,981	\$599,335	\$281,972	\$1,677,107	190%	-71.20%
Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF	117	425	\$629,004	\$683,983	\$1,312,987	\$595,982	\$264,761	\$860,743	\$452,244	\$17,051,509	1299%	96.54%
Correction Captains Assoc AF	4	808	\$778,082	\$2,206,941	\$2,985,023	\$1,584,266	\$198,796	\$1,783,062	\$1,201,961	\$17,994,543	603%	-8.77%
TOTAL UP TO \$1 MILLION CATEGORY	7 FUNDS:		<u>\$3,269,909</u>	<u>\$5,399,619</u>	<u>\$8,669,528</u>	<u>\$3,688,262</u>	<u>\$703,209</u>	<u>\$4,391,471</u>	<u>\$4,278,057</u>	<u>\$57,285,768</u>	<u>661%</u>	
NYC CONTRIBUTION \$1 TO \$3 MILLION												
Local 300 SEIU Civil Service Forum AF	125	827	\$1,196,326	\$1,501,707	\$2,698,033	\$452,778	\$142,048	\$594,826	\$2,103,207	\$14,959,306	554%	-4.13%
Local 891(IUOE) AF	126	971	\$2,327,335	\$4,275,108	\$6,602,443	\$969,316	\$354,021	\$1,323,337	\$5,279,106	\$34,050,500	516%	-10.83%
Doctors Council AF	124	1,304	\$2,368,580	\$2,661,411	\$5,029,991	\$1,391,035	\$144,351	\$1,535,386	\$3,494,605	\$40,946,512	814%	28.51%
Local 246 SEIU NYC AF	128	2,008	\$2,469,150	\$4,944,946	\$7,414,096	\$2,055,993	\$268,772	\$2,324,765	\$5,089,331	\$35,804,503	483%	-16.50%
TOTAL \$1 TO \$3 MILLION CATEGORY	4 FUNDS:		<u>\$8,361,391</u>	<u>\$13,383,172</u>	<u>\$21,744,563</u>	<u>\$4,869,122</u>	<u>\$909,192</u>	<u>\$5,778,314</u>	<u>\$15,966,249</u>	<u>\$125,760,821</u>	<u>578%</u>	
NYC CONTRIBUTION \$3 TO 10 MILLION												
DC 37 AFSCME AF	121	32,748	\$3,240,291	\$6,609,767	\$9,850,058	\$3,566,325	\$973,563	\$4,539,888	\$5,310,170	\$89,945,158	913%	44.15%
Local 444 Sanitation Officers AF	63	1,188	\$3,728,754	\$9,239,563	\$12,968,317	\$4,488,330	\$353,821	\$4,842,151	\$8,126,166	\$54,166,782	418%	-34.06%
Local 1180 CWA Members AF	119	8,292	\$4,004,355	\$11,722,767	\$15,727,122	\$3,464,403	\$349,024	\$3,813,427	\$11,913,695	\$75,146,700	478%	-24.57%
Local 854 Uniformed Fire Officers Assoc AF	76	3,971	\$4,277,960	\$13,929,623	\$18,207,583	\$6,645,228	\$320,076	\$6,965,304	\$11,242,279	\$166,050,138	912%	43.97%
Council of Supervisors and Administrators AF	132	6,710	\$4,325,172	\$313,051	\$4,638,223	\$1,001,788	\$94,890	\$1,096,678	\$3,541,545	\$20,436,155	441%	-30.45%
Detectives Endowment Assoc AF	14	5,202	\$4,762,603	\$33,857,974	\$38,620,577	\$14,430,727	\$1,457,915	\$15,888,642	\$22,731,935	\$204,338,447	529%	-16.48%
Superior Officers Council (Police) AF	104	4,967	\$4,916,264	\$24,682,197	\$29,598,461	\$8,821,759	\$363,337	\$9,185,096	\$20,413,365	\$261,818,666	885%	39.64%
Local 30 A-D IUOE Engineers AF	114	1,211	\$6,264,354	\$12,667,731	\$18,932,085	\$4,900,711	\$118,022	\$5,018,733	\$13,913,352	\$103,502,886	547%	-13.70%
Sergeants Benevolent Assoc (Police) AF	112	4,761	\$6,432,831	\$19,774,201	\$26,207,032	\$7,206,393	\$385,700	\$7,592,093	\$18,614,939	\$188,439,442	719%	13.51%
Local 94 Uniformed Firefighters Assoc AF	82	18,100	\$7,689,132	\$21,750,128	\$29,439,260	\$9,735,234	\$347,762	\$10,082,996	\$19,356,264	\$164,640,250	559%	-11.72%
Correction Officers' Benevolent Assoc AF	8	10,182	\$9,972,033	\$8,360,214	\$18,332,247	\$6,115,222	\$821,857	\$6,937,079	\$11,395,168	\$81,114,973	442%	-30.15%
TOTAL \$3 TO \$10 MILLION CATEGORY	11 FUNDS:		<u>\$59,613,749</u>	<u>\$162,907,216</u>	<u>\$222,520,965</u>	<u>\$70,376,120</u>	<u>\$5,585,967</u>	<u>\$75,962,087</u>	<u>\$146,558,878</u>	<u>\$1,409,599,597</u>	<u>633%</u>	
NYC CONTRIBUTION MORE THAN \$10 MILLION												
Local 371 Social Service Employees AF	123	16,296	\$10,892,240	\$4,824,339	\$15,716,579	\$4,012,399	\$891,688	\$4,904,087	\$10,812,492	\$102,519,768	652%	16.44%
Patrolmen's Benevolent Assoc AF	95	31,218	\$11,952,633	\$18,530,855	\$30,483,488	\$8,974,309	\$779,578	\$9,753,887	\$20,729,601	\$218,207,154	716%	27.78%
Local 237 Teamsters AF	43	8,255	\$15,864,238	\$38,534,480	\$54,398,718	\$13,980,898	\$1,631,457	\$15,612,355	\$38,786,363	\$238,674,347	439%	-21.68%
Local 831 Uniformed Sanitationmen's Assoc AF	71	6,200	\$17,999,990	\$11,867,053	\$29,867,043	\$10,191,051	\$589,521	\$10,780,572	\$19,086,471	\$171,481,892	574%	2.49%
TOTAL MORE THAN \$10 MILLION CATEGORY	4 FUNDS:		<u>\$56,709,101</u>	<u>\$73,756,727</u>	<u>\$130,465,828</u>	<u>\$37,158,657</u>	<u>\$3,892,244</u>	<u>\$41,050,901</u>	<u>\$89,414,927</u>	<u>\$730,883,161</u>	<u>560%</u>	
TOTAL ANNUITY FUNDS	26 FUNDS:		<u>\$127,954,150</u>	<u>\$255,446,734</u>	<u>\$383,400,884</u>	<u>\$116,092,161</u>	<u>\$11,090,612</u>	<u>\$127,182,773</u>	<u>\$256,218,111</u>	<u>\$2,323,529,347</u>	<u>606%</u>	
GRAND TOTAL	90 FUNDS:		<u>\$1,142,347,625</u>	<u>\$332,942,065</u>	<u>\$1,475,289,690</u>	<u>\$1,065,544,536</u>	<u>\$101,230,165</u>	<u>\$1,166,795,630</u>	<u>\$308,494,060</u>	<u>\$3,511,808,642</u>	<u>238%</u>	

2013 SCHEDULE OF FINANCIAL DATA

FROM ANALYSIS OF FINANCIAL AND OPERATING PRACTICES

NAME OF FUND	REASON FUND IS EXCLUDED (SEE NOTE)	REF	NUMBER OF NYC MEMBERS	NYC CONTRIBUTION REVENUE	TOTAL REVENUE	NYC % OF TOTAL REVENUE	FUND BALANCE
Surrogates & Supreme Court Reporters Assoc RWF	(1)	108	N/A	\$850	\$282,525	0.30%	\$660,565
NYS Court Officers Assoc RWF	(1)	91	2	\$1,660	\$2,341,253	0.07%	\$10,801,608
Local 40 Iron Workers WF	(1)	118	86	\$111,011	\$83,185,438	0.13%	\$116,469,029
Pavers & Road Builders District Council WF	(1)	100	280	\$465,503	\$30,188,344	1.54%	\$38,069,543
DC 9 Painting Industry AF (Local 1969)	(1)	19	859	\$486,389	\$71,755,333	0.68%	\$477,007,503
Local 40 Iron Workers AF	(1)	111	46	\$1,212,960	\$108,751,792	1.12%	\$719,230,918
NYC DC of Carpenters WF/RWF	(1)	88	963	\$1,921,562	\$341,085,438	0.56%	\$259,821,860
Local 1199 Nat Ben Fund Hosp Health Care WF/RWF	(1)	35	2,444	\$3,849,041	\$1,463,868,918	0.26%	\$613,243,799
Local 3 IBEW Electrical Workers Industry AF	(1)	49	1,165	\$8,134,864	\$93,850,546	8.67%	\$1,254,191,617
NYS Court Clerks Assoc RWF	(2)	90	8	\$7,440	\$1,219,853	0.61%	\$1,449,217
Local 1 Plumbing Industry AF	(2)	27	481	\$17,546	\$7,305,450	0.24%	\$81,890,873
NYC DC of Carpenters AF	(2)	116	613	\$6,832,903	\$280,640,978	2.43%	\$1,748,438,154
UFT Albert Shanker College Scholarship Fund	(3)	40	N/A	\$1,040,025	\$1,040,319	99.97%	\$534,077
Captains Endowment Assoc CLRF	(4)	106.1	706	\$52,975	\$53,118	99.73%	\$184,036
Detectives Endowment Assoc CLRF	(4)	16.1	5,058	\$371,130	\$550,599	67.40%	\$3,861,399
Committee of Interns and Residents ED	(4)	122	N/A	\$1,724,297	\$1,781,736	96.78%	\$1,893,970
Local 858 IBT, (OTB) Branch Office Managers WF	(5)	79	111	\$0	\$42,938	0.00%	\$505,154
Total NYC Contribution				\$26,230,156			

N/A - Fund did not specify the Number of NYC Members

NOTE: The above listed funds have been excluded from this analysis because:

- (1) These funds received a substantial portion of their revenues from sources other than the City.
- (2) These funds would distort category averages since they include other groups' that received a substantial portion of their revenues from sources other than the City.
- (3) Under the United Federation of Teachers' collective bargaining agreement, scholarship benefits are paid only to public high school students.
- (4) These funds had different fiscal year-end dates than their associated welfare funds so that consolidation would have distorted the information reported.
- (5) This fund has a balance though it no longer receives contributions from the City, effective December 7, 2010 (FY11), when OTB closed its operations.

2013 SCHEDULE OF ADMINISTRATIVE EXPENSES

NAME OF FUND	REF	TOTAL ADMIN. EXPENSE	RENT	SALARIES	FEES & COMMISSN	LEGAL	ACCT'G	TRAVEL & CONF.	TELE- PHONE	OFFICE EQUIP & RENTAL	OTHER OFFICE EXPENSE	INSUR- ANCE	REPAIRS & MAINT	OTHER	INSURANCE RETENTION	INVEST & CUSTODIAL SERVICES
SELF-INSURED WF & RWF																
NYC CONTRIBUTION UP TO \$1 MILLION																
Local 306 Municipal Employees WF	56	\$25,383	\$0	\$0	\$9,600	\$8,437	\$5,387	\$45	\$0	\$0	\$0	\$1,724	\$0	\$190	\$0	\$0
Local No. 5 MNCPL Employees Benefit Trust Fund	84	\$20,819	\$0	\$13,500	\$2,090	\$0	\$4,000	\$0	\$0	\$0	\$910	\$0	\$0	\$319	\$0	\$0
Local 14 -14B IUOE WF/RWF	37	\$20,115	\$1,774	\$9,626	\$0	\$0	\$2,979	\$0	\$118	\$496	\$1,218	\$3,904	\$0	\$0	\$0	\$0
NYC Muni. Steamfitters & Steamfitter Helpers RWF	87	\$20,458	\$0	\$0	\$7,833	\$1,500	\$9,237	\$0	\$0	\$0	\$0	\$1,809	\$0	\$79	\$0	\$0
NYC Muni. Steamfitters & Steamfitter Helpers WF	86	\$27,507	\$0	\$0	\$12,037	\$2,500	\$9,237	\$0	\$0	\$0	\$0	\$3,472	\$0	\$261	\$0	\$0
Local 333 United Marine Division RWF	59	\$62,996	\$2,136	\$20,651	\$5,790	\$5,500	\$20,906	\$0	\$1,139	\$736	\$1,466	\$3,832	\$465	\$375	\$0	\$0
Local 3 IBEW City Employees WF	48	\$34,933	\$0	\$0	\$17,863	\$6,355	\$8,659	\$780	\$0	\$0	\$320	\$956	\$0	\$0	\$0	\$0
Local 15, 15A, 15C Operating Engineers WF/RWF	38	\$194,384	-\$27,481	\$154,017	\$0	\$4,000	\$13,000	\$615	\$0	\$5,511	\$3,895	\$8,534	\$3,641	\$651	\$0	\$28,001
United Probation Officers Assoc RWF	110	\$169,536	\$38,108	\$77,463	\$0	\$5,742	\$15,000	\$1,704	\$2,091	\$19,012	\$4,296	\$1,442	\$587	\$3,791	\$0	\$300
Assistant Dep Wardens/Dep Wardens WF/RWF/CLRF	2	\$111,854	\$11,790	\$18,847	\$21,134	\$7,500	\$20,000	\$9,158	\$961	\$0	\$11,099	\$0	\$0	\$365	\$0	\$11,000
Local 300 Civil Service Forum RWF	54	\$186,823	\$45,202	\$13,312	\$76,950	\$10,000	\$10,000	\$9,162	\$0	\$1,716	\$7,773	\$889	\$0	\$1,652	\$0	\$10,168
Doctors Council RWF	21	\$170,288	\$52,995	\$43,535	\$40,386	\$5,442	\$8,484	\$0	\$0	\$0	\$7,453	\$1,117	\$0	\$0	\$0	\$10,876
TOTAL UP TO \$1 MILLION CATEGORY	12 FUNDS:	\$1,045,096	\$124,524	\$350,950	\$193,683	\$56,976	\$126,889	\$21,464	\$4,309	\$27,471	\$38,430	\$27,679	\$4,693	\$7,683	\$0	\$60,345
NYC CONTRIBUTION \$1 TO \$3 MILLION																
NYC Municipal Plumbers & Pipefitters WF	85	\$107,895	\$0	\$0	\$55,160	\$9,094	\$10,755	\$21,475	\$0	\$0	\$0	\$6,078	\$0	\$360	\$0	\$4,973
United Probation Officers Assoc WF	109	\$311,908	\$76,046	\$137,276	\$1,340	\$9,268	\$15,000	\$1,029	\$3,739	\$31,537	\$7,577	\$2,777	\$900	\$25,119	\$0	\$300
Correction Captains Assoc WF/CLRF	6/6.1	\$114,351	\$7,978	\$14,348	\$34,770	\$9,214	\$13,000	\$6,283	\$2,159	\$463	\$1,511	\$959	\$0	\$7,893	\$9,334	\$6,439
Local 1181 CWA Supervisory Employees WF/RWF	32	\$180,400	\$53,349	\$0	\$45,795	\$9,600	\$21,025	\$23,395	\$5,017	\$3,394	\$2,856	\$4,818	\$11,903	-\$2,999	\$0	\$2,247
Doctors Council WF	22	\$314,616	\$40,232	\$111,636	\$32,911	\$43,064	\$12,719	\$638	\$0	\$38,210	\$10,164	\$2,121	\$0	\$0	\$0	\$22,921
DC 9 Painting Industry WF/RWF (Local 1969)	20	\$129,428	\$3,540	\$103,050	\$9,750	\$0	\$0	\$0	\$0	\$0	\$8,646	\$0	\$0	\$0	\$0	\$4,442
Local 300 Civil Service Forum WF	55	\$202,194	\$24,730	\$44,250	\$78,755	\$14,325	\$10,000	\$6,407	\$0	\$4,494	\$6,521	\$1,549	\$624	\$4,088	\$0	\$6,451
Local 3 IBEW Electricians RWF	50	\$195,857	\$4,123	\$85,642	\$46,325	\$4,300	\$10,000	\$3,133	\$2,933	\$1,100	\$14,326	\$2,324	\$1,772	\$783	\$0	\$19,097
Civil Service Bar Assoc WF	3	\$230,775	\$2,031	\$6,000	\$185,411	\$8,087	\$14,650	\$0	\$0	\$0	\$491	\$10,788	\$0	\$3,317	\$0	\$0
1199 SEIU Licensed Practical Nurses WF	68	\$291,525	\$40,078	\$66,967	\$58,272	\$15,132	\$10,325	\$1,336	\$2,220	\$24,412	\$8,100	\$2,233	\$2,727	\$3,472	\$56,252	\$0
Local 3 IBEW Electricians WF	51	\$234,454	\$6,847	\$88,650	\$50,676	\$13,319	\$14,000	\$1,362	\$3,308	\$1,240	\$10,452	\$2,683	-\$1,772	\$5,257	\$0	\$38,431
Local 211 Allied Building Inspectors WF	42	\$152,078	\$24,728	\$38,860	\$38,484	\$10,000	\$17,500	\$0	\$2,505	\$540	\$7,452	\$12,009	\$0	\$0	\$0	\$0
Local 246 SEIU RWF	46	\$244,021	\$19,615	\$61,947	\$97,480	\$6,211	\$6,500	\$11,445	\$1,760	\$2,315	\$5,130	\$5,450	\$0	\$1,738	\$0	\$24,430
Local 444 Sanitation Officers WF	65	\$125,230	\$3,235	\$30,394	\$36,482	\$4,400	\$11,000	\$8,495	\$1,682	\$0	\$3,781	\$2,064	\$0	\$0	\$0	\$23,697
Local 246 SEIU WF	47	\$320,115	\$27,087	\$82,590	\$121,386	\$10,874	\$6,500	\$11,774	\$2,430	\$5,347	\$14,025	\$6,340	\$0	\$3,859	\$0	\$27,903
Local 891 School Custodian & Engineers WF/RWF/ED	80	\$518,174	\$18,031	\$146,467	\$85,549	\$24,500	\$43,000	\$7,565	\$719	\$41,683	\$11,899	\$3,980	\$0	\$39,259	\$69,204	\$26,318
Correction Captains Assoc RWF	5	\$164,869	\$17,917	\$18,805	\$75,714	\$7,288	\$10,000	\$10,355	\$4,850	\$1,040	\$3,802	\$1,434	\$0	\$3,785	\$0	\$9,879
TOTAL \$1 TO \$3 MILLION CATEGORY	17 FUNDS:	\$3,837,890	\$369,567	\$1,036,882	\$1,054,260	\$198,676	\$225,974	\$114,692	\$33,322	\$155,775	\$116,732	\$67,606	\$16,154	\$95,931	\$134,790	\$217,528
NYC CONTRIBUTION \$3 TO \$10 MILLION																
Local 444 Sanitation Officers RWF	64	\$256,410	\$3,235	\$46,927	\$87,520	\$4,400	\$11,000	\$5,845	\$1,682	\$0	\$4,179	\$5,606	\$0	\$0	\$0	\$86,016
Local 854 Uniformed Fire Officers Assoc WF	77	\$199,867	\$12,834	\$123,449	\$0	\$17,147	\$18,825	\$2,402	\$817	\$0	\$7,874	\$5,207	\$0	\$0	\$11,312	\$0
Superior Officers Council (Police) WF/CLRF	106	\$394,338	\$19,798	\$122,242	\$1,556	\$25,220	\$17,000	\$312	\$3,135	\$7,641	\$1,837	\$3,652	\$0	\$12,600	\$179,345	\$0
House Staff Comm of Interns & Residents WF/Legal	24	\$576,256	\$5,457	\$349,583	\$18,489	\$10,009	\$32,650	\$10,926	\$1,698	\$51,808	\$25,369	\$12,150	\$0	\$5,674	\$0	\$52,443
Local 1182 CWA Security Benefits Fund WF/RWF/Legal	33	\$956,842	\$72,025	\$320,743	\$263,773	\$33,375	\$24,525	\$21,283	\$7,423	\$21,284	\$12,439	\$15,673	\$29,140	\$4,380	\$116,013	\$14,766
New York City RWF	89	\$433,904	\$0	\$0	\$253,488	\$97,500	\$18,406	\$14,267	\$0	\$0	\$12,859	\$8,269	\$0	\$0	\$0	\$29,115
Local 854 Uniformed Fire Officers Assoc RWF	78	\$722,053	\$30,576	\$205,397	\$0	\$26,335	\$18,830	\$2,348	\$1,950	\$0	\$8,712	\$6,236	\$0	\$0	\$421,669	\$0
Detectives Endowment Assoc WF	16	\$947,146	\$42,000	\$395,883	\$416,739	\$18,042	\$17,500	\$0	\$2,855	\$14,079	\$18,502	\$1,179	\$0	\$708	\$0	\$19,65

2013 SCHEDULE OF ADMINISTRATIVE EXPENSES

NAME OF FUND	REF	TOTAL ADMIN. EXPENSE	RENT	SALARIES	FEES & COMSSSN	LEGAL	ACCT'G	TRAVEL & CONF.	TELEPHONE	OFFICE EQUIP & RENTAL	OTHER OFFICE EXPENSE	INSURANCE	REPAIRS & MAINT	OTHER	INSURANCE RETENTION	INVEST & CUSTODIAL SERVICES
SELF-INSURED WF & RWF (continued)																
NYC CONTRIBUTION \$10 TO \$20 MILLION																
Local 1 Council of Supervisors & Admin WF	25	\$1,050,560	\$66,141	\$544,421	\$243,712	\$7,200	\$40,715	\$14,121	\$10,093	\$32,813	\$29,542	\$20,398	\$0	\$19,022	\$0	\$22,382
Organization of Staff Analysts WF/RWF/ED	93	\$1,430,692	\$167,852	\$824,256	\$330,555	\$0	\$17,250	\$250	\$6,981	\$16,595	\$34,197	\$26,325	\$0	\$6,431	\$0	\$0
Local 1 Council of Supervisors & Admin RWF	26	\$1,270,541	\$82,463	\$678,775	\$290,856	\$7,200	\$32,251	\$423	\$12,585	\$40,911	\$40,811	\$24,001	\$0	\$22,934	\$0	\$37,331
Local 94 Uniformed Firefighters Assoc WF	83	\$731,056	\$37,185	\$318,506	\$61,610	\$18,000	\$12,000	\$1,542	\$4,236	\$36,771	\$9,337	\$4,915	\$92	\$0	\$0	\$226,862
Correction Officers' Benevolent Assoc RWF	7	\$582,890	\$55,451	\$169,297	\$157,135	\$55,500	\$25,000	\$0	\$0	\$14,417	\$92,623	\$0	\$2,826	\$10,641	\$0	\$0
New York State Nurses Assoc WF	92	\$845,807	\$64,750	\$75,250	\$421,231	\$15,000	\$16,100	\$7,313	\$7,000	\$10,500	\$17,972	\$11,176	\$0	\$55,000	\$110,227	\$34,288
Local 831 Uniformed Sanitationmen's Assoc RWF	72	\$589,483	\$27,312	\$157,699	\$285,020	\$50,500	\$15,498	\$0	\$6,000	\$3,780	\$7,642	\$831	\$0	\$0	\$0	\$35,201
Correction Officers' Benevolent Assoc WF/CLRF	9	\$634,558	\$55,451	\$169,297	\$135,477	\$55,500	\$45,000	\$0	\$0	\$14,417	\$137,832	\$0	\$2,826	\$18,758	\$0	\$0
Local 237 Teamsters RWF	44	\$1,663,472	\$141,728	\$990,597	\$108,723	\$65,120	\$28,823	\$13,798	\$9,831	\$45,388	\$191,153	\$13,094	\$0	\$0	\$0	\$55,217
Local 94 Uniformed Firefighters Assoc RWF	81	\$781,823	\$37,185	\$322,897	\$266,610	\$9,700	\$12,000	\$1,440	\$4,236	\$35,846	\$6,944	\$5,307	\$90	\$0	\$0	\$79,568
Detectives Endowment Assoc RWF	15	\$1,477,571	\$42,000	\$418,250	\$722,117	\$19,875	\$2,000	\$0	\$6,356	\$31,345	\$41,191	\$6,445	\$0	\$26,340	\$0	\$142,651
TOTAL \$10 TO \$20 MILLION CATEGORY	11 FUNDS:	\$11,058,453	\$777,518	\$4,669,245	\$3,023,046	\$303,595	\$265,637	\$38,887	\$67,318	\$282,783	\$609,244	\$112,492	\$5,834	\$159,126	\$110,227	\$633,500
NYC CONTRIBUTION MORE THAN \$20 MILLION																
Sergeants Benevolent Assoc (Police) WF/RWF/CLRF	113	\$1,124,836	\$13,199	\$514,348	\$348,086	\$128,000	\$26,253	\$0	\$8,279	\$23,465	\$53,425	\$3,865	\$0	\$5,916	\$0	\$0
Local 371 Social Service Employees WF/ED/Legal/ADM	62	\$2,641,267	\$228,156	\$1,887,996	\$260,301	\$164,000	\$45,750	\$13,116	\$26,578	\$140,983	\$129,677	\$32,642	\$22,278	-\$345,024	\$0	\$34,814
Local 237 Teamsters WF	45	\$4,098,643	\$272,652	\$2,428,908	\$633,931	\$203,360	\$59,183	\$9,276	\$12,450	\$185,459	\$249,117	\$29,695	\$81,778	-\$246,265	\$0	\$179,099
Patrolmen's Benevolent Assoc WF/CLRF	97	\$3,412,880	\$294,081	\$1,976,684	\$653,111	\$120,960	\$116,674	\$0	\$22,075	\$78,976	\$67,775	\$49,863	\$31,773	\$0	\$0	\$908
Patrolmen's Benevolent Assoc RWF	96	\$3,227,938	\$257,361	\$1,864,963	\$709,876	\$61,440	\$94,382	\$0	\$17,879	\$78,015	\$66,695	\$44,381	\$32,112	\$0	\$0	\$834
Professional Staff Congress CUNY WF/RWF	101	\$1,864,107	\$187,581	\$1,273,045	\$131,278	\$67,031	\$43,000	\$14,214	\$27,270	\$21,268	\$63,748	\$15,930	\$0	\$2,453	\$0	\$17,289
Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM	30	\$4,901,644	\$449,687	\$2,189,898	\$725,470	\$101,518	\$60,250	\$32,520	\$68,309	\$378,721	\$409,170	\$90,465	\$49,003	\$273,154	\$0	\$73,479
DC 37 WF	10	\$24,451,465	\$923,690	\$10,519,128	\$141,081	\$370,732	\$166,189	\$59,748	\$85,899	\$5,035,992	\$1,058,416	\$196,638	\$44,788	\$5,684,761	\$0	\$164,403
Local 2 United Federation of Teachers WF/RWF	41	\$21,560,673	\$3,206,717	\$10,695,278	\$4,990,085	\$98,126	\$62,215	\$31,210	\$131,168	\$586,532	\$921,452	\$88,495	\$417,919	\$3,654	\$0	\$327,822
TOTAL MORE THAN \$20 MILLION CATEGORY	9 FUNDS:	\$67,283,453	\$5,833,124	\$33,350,248	\$8,593,219	\$1,315,167	\$673,896	\$160,084	\$399,907	\$6,529,411	\$3,019,475	\$551,974	\$679,651	\$5,378,649	\$0	\$798,648
TOTAL SELF-INSURED FUNDS	59 FUNDS:	\$89,702,667	\$7,585,226	\$41,559,032	\$14,062,025	\$2,177,567	\$1,471,941	\$392,510	\$533,908	\$7,156,279	\$4,017,289	\$832,465	\$832,620	\$5,692,256	\$1,444,090	\$1,945,459
INSURED WF & RWF																
NYC CONTRIBUTION UP TO \$3 MILLION																
NYC Deputy Sheriffs Assoc RWF	12	\$5,974	\$0	\$0	\$0	\$0	\$3,900	\$0	\$0	\$0	\$2,074	\$0	\$0	\$0	\$0	\$0
NYC Deputy Sheriffs Assoc WF	13	\$3,900	\$0	\$0	\$0	\$0	\$3,900	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Fire Alarm Dispatchers Benevolent Assoc WF	23	\$53,795	\$3,419	\$31,505	\$12,709	\$0	\$0	\$0	\$3,321	\$484	\$1,096	\$1,006	\$0	\$255	\$0	\$0
Local 333 United Marine Division WF	60	\$71,021	\$3,114	\$30,107	\$0	\$5,500	\$22,694	\$0	\$1,661	\$1,073	\$1,473	\$4,459	\$678	\$264	\$0	\$0
Local 30 A-C Operating Municipal Engineers WF/RWF	57	\$302,196	\$6,110	\$103,126	\$78,848	\$36,334	\$37,782	\$10,206	\$0	\$4,998	\$12,690	\$5,466	\$6,636	\$0	\$0	\$0
TOTAL UP TO \$3 MILLION CATEGORY	5 FUNDS:	\$436,886	\$12,643	\$164,738	\$91,557	\$41,834	\$68,276	\$10,206	\$4,982	\$6,555	\$17,333	\$10,931	\$7,314	\$519	\$0	\$0
TOTAL SELF-INSURED AND INSURED FUNDS	64 FUNDS:	\$90,139,553	\$7,597,868	\$41,723,770	\$14,153,582	\$2,219,401	\$1,540,217	\$402,716	\$538,890	\$7,162,834	\$4,034,621	\$843,395	\$839,934	\$5,692,775	\$1,444,090	\$1,945,459

2013 SCHEDULE OF ADMINISTRATIVE EXPENSES

NAME OF FUND	REF	TOTAL ADMIN. EXPENSE	RENT	SALARIES	FEES & COMMSN	LEGAL	ACCT'G	TRAVEL & CONF.	TELEPHONE	OFFICE EQUIP & RENTAL	OTHER OFFICE EXPENSE	INSURANCE	REPAIRS & MAINT	OTHER	INSURANCE RETENTION	INVEST & CUSTODIAL SERVICES
ANNUITY FUNDS																
NYC CONTRIBUTION UP TO \$1 MILLION																
Assistant Dep Wardens/Dep Wardens AF	1	\$82,194	\$0	\$0	\$7,200	\$5,000	\$11,000	\$0	\$0	\$0	\$0	\$4,149	\$0	\$0	\$0	\$54,845
NYC Deputy Sheriffs Assoc AF	11	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Civil Service Bar Assoc AF	130	\$53,593	\$0	\$0	\$33,962	\$4,958	\$10,250	\$0	\$0	\$0	\$0	\$3,705	\$0	\$718	\$0	\$0
Local 3 IBEW Communications Electricians AF	127	\$33,884	\$0	\$0	\$10,848	\$7,188	\$7,500	\$0	\$0	\$0	\$0	\$8,023	\$0	\$325	\$0	\$0
Local 444 Sanitation Officers Supplemental AF	133	\$69,981	\$0	\$40,755	\$10,086	\$0	\$10,000	\$0	\$0	\$0	\$0	\$1,486	\$0	\$0	\$0	\$7,654
Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF	117	\$264,761	\$3,256	\$169,147	\$0	\$10,000	\$14,000	\$600	\$0	\$727	\$3,781	\$7,546	\$270	\$0	\$0	\$55,434
Correction Captains Assoc AF	4	\$198,796	\$9,248	\$9,706	\$15,000	\$12,465	\$11,000	\$10,355	\$2,503	\$1,261	\$869	\$6,686	\$0	\$0	\$0	\$119,702
TOTAL UP TO \$1 MILLION CATEGORY	7 FUNDS:	\$703,209	\$12,504	\$219,608	\$77,096	\$39,611	\$63,750	\$10,955	\$2,503	\$1,988	\$4,650	\$31,595	\$270	\$1,043	\$0	\$237,635
NYC CONTRIBUTION \$1 TO \$3 MILLION																
Local 300 SEIU Civil Service Forum AF	125	\$142,048	\$4,230	\$3,793	\$16,675	\$9,000	\$15,000	\$11,956	\$0	\$256	\$38	\$246	\$104	\$2,191	\$0	\$78,559
Local 891(IUOE) AF	126	\$354,021	\$0	\$0	\$11,568	\$12,000	\$20,000	\$0	\$0	\$10,911	\$707	\$10,337	\$0	\$85,407	\$0	\$203,091
Doctors Council AF	124	\$144,351	\$0	\$0	\$26,834	\$28,080	\$12,600	\$0	\$0	\$0	\$45,319	\$14,518	\$0	\$0	\$0	\$17,000
Local 246 SEIU NYC AF	128	\$268,772	\$0	\$0	\$18,000	\$8,958	\$7,000	\$5,976	\$0	\$0	\$4,399	\$5,289	\$0	\$989	\$0	\$218,161
TOTAL \$1 TO \$3 MILLION CATEGORY	4 FUNDS:	\$909,192	\$4,230	\$3,793	\$73,077	\$58,038	\$54,600	\$17,932	\$0	\$11,167	\$50,463	\$30,390	\$104	\$88,587	\$0	\$516,811
NYC CONTRIBUTION \$3 TO 10 MILLION																
DC 37 AFSCME AF	121	\$973,563	\$0	\$0	\$479,437	\$14,403	\$21,000	\$455	\$0	\$12,269	\$14,125	\$27,999	\$0	\$307,423	\$0	\$96,452
Local 444 Sanitation Officers AF	63	\$353,821	\$0	\$0	\$9,681	\$4,400	\$19,750	\$5,356	\$0	\$0	\$0	\$14,453	\$0	\$30,925	\$0	\$269,256
Local 1180 CWA Members AF	119	\$349,024	\$0	\$0	\$89,100	\$11,702	\$14,000	\$0	\$0	\$0	\$28,072	\$8,216	\$0	\$2,563	\$0	\$195,371
Local 854 Uniformed Fire Officers Assoc AF	76	\$320,076	\$26,650	\$177,597	\$76,178	\$24,006	\$0	\$343	\$1,448	\$1,062	\$4,052	\$8,724	\$0	\$16	\$0	\$0
Council of Supervisors and Administrators AF	132	\$94,890	\$0	\$0	\$26,456	\$24,000	\$12,400	\$0	\$0	\$0	\$7,530	\$9,798	\$0	\$0	\$0	\$14,706
Detectives Endowment Assoc AF	14	\$1,457,915	\$21,000	\$46,366	\$20,680	\$16,458	\$27,500	\$0	\$2,303	\$2,934	\$24,424	\$19,698	\$0	\$1,331	\$0	\$1,275,223
Superior Officers Council (Police) AF	104	\$363,337	\$9,899	\$61,122	\$9,080	\$74,028	\$15,000	\$47,965	\$1,568	\$24,667	\$82,903	\$6,467	\$0	\$7,638	\$0	\$23,000
Local 30 A-D IUOE Engineers AF	114	\$118,022	\$3,156	\$30,027	\$23,342	\$12,167	\$25,478	\$111	\$0	\$2,499	\$2,938	\$11,335	\$2,872	\$0	\$0	\$4,097
Sergeants Benevolent Assoc (Police) AF	112	\$385,700	\$6,600	\$93,662	\$49,546	\$48,000	\$36,000	\$0	\$4,140	\$1,228	\$0	\$16,438	\$0	\$2,979	\$0	\$127,107
Local 94 Uniformed Firefighters Assoc AF	82	\$347,762	\$18,520	\$194,343	\$22,027	\$9,700	\$4,500	\$522	\$4,213	\$6,619	\$5,009	\$25,803	\$88	\$0	\$0	\$56,418
Correction Officers' Benevolent Assoc AF	8	\$821,857	\$30,686	\$83,992	\$131,578	\$55,500	\$32,500	\$0	\$0	\$3,256	\$38,058	\$0	\$1,290	\$0	\$0	\$444,998
TOTAL \$3 TO \$10 MILLION CATEGORY	11 FUNDS:	\$5,585,967	\$116,511	\$687,109	\$937,105	\$294,364	\$208,128	\$54,752	\$13,672	\$54,534	\$207,111	\$148,931	\$4,250	\$352,875	\$0	\$2,506,628
NYC CONTRIBUTION MORE THAN \$10 MILLION																
Local 371 Social Service Employees AF	123	\$891,688	\$0	\$0	\$3,350	\$36,000	\$12,000	\$0	\$0	\$0	\$36,500	\$8,500	\$0	\$357,452	\$0	\$437,886
Patrolmen's Benevolent Assoc AF	95	\$779,578	\$12,240	\$134,102	\$466	\$9,600	\$48,061	\$0	\$861	\$3,443	\$6,486	\$26,140	\$1,121	\$0	\$0	\$537,058
Local 237 Teamsters AF	43	\$1,631,457	\$22,854	\$203,252	\$0	\$111,720	\$47,389	\$6,117	\$0	\$19,210	\$59,778	\$41,523	\$0	\$0	\$0	\$1,119,614
Local 831 Uniformed Sanitationmen's Assoc AF	71	\$589,521	\$23,669	\$101,025	\$74,380	\$22,154	\$5,834	\$0	\$0	\$1,890	\$10,258	\$274	\$0	\$0	\$0	\$350,037
TOTAL MORE THAN \$10 MILLION CATEGORY	4 FUNDS:	\$3,892,244	\$58,763	\$438,379	\$78,196	\$179,474	\$113,284	\$6,117	\$861	\$24,543	\$113,022	\$76,437	\$1,121	\$357,452	\$0	\$2,444,595
TOTAL ANNUITY FUNDS	26 FUNDS:	\$11,090,612	\$192,008	\$1,348,889	\$1,165,474	\$571,487	\$439,762	\$89,756	\$17,036	\$92,232	\$375,246	\$287,353	\$5,745	\$799,957	\$0	\$5,705,669
GRAND TOTAL	90 FUNDS:	\$101,230,165	\$7,789,876	\$43,072,658	\$15,319,056	\$2,790,889	\$1,979,979	\$492,472	\$555,926	\$7,255,066	\$4,409,867	\$1,130,748	\$845,679	\$6,492,732	\$1,444,090	\$7,651,128

2013 SCHEDULE OF BENEFIT FUND RATIOS

NAME OF FUND	REF	DEVIATION		DEVIATION		DEVIATION		DEVIATION		EXCESS/ TOTAL REV.	DEVIATION FROM CAT. AVERAGE
		BEN EXP/ TOTAL REV.	FROM CAT. AVERAGE	ADMIN EXP/ TOTAL REV.	FROM CAT. AVERAGE	BEN EXP/ TOTAL EXP	FROM CAT. AVERAGE	ADMIN EXP/ TOTAL EXP	FROM CAT. AVERAGE		
SELF-INSURED WF & RWF											
NYC CONTRIBUTION UP TO \$1 MILLION											
Local 306 Municipal Employees WF	56	94.01%	18.27%	29.44%	65.55%	76.16%	-4.93%	23.84%	29.94%	-23.45%	-1643.05%
Local No. 5 MNCPL Employees Benefit Trust Fund	84	26.60%	-66.53%	7.71%	-56.63%	77.52%	-3.22%	22.48%	22.48%	65.68%	4221.86%
Local 14 -14B IUOE WF/RWF	37	64.30%	-37.36%	13.95%	-21.57%	82.18%	-20.56%	17.82%	-2.87%	21.75%	1331.38%
NYC Muni. Steamfitters & Steamfitter Helpers RWF	87	90.97%	14.44%	12.70%	-28.57%	87.75%	9.54%	12.25%	-33.23%	-3.67%	-341.39%
NYC Muni. Steamfitters & Steamfitter Helpers WF	86	108.36%	36.33%	13.91%	-21.76%	88.62%	10.63%	11.38%	-38.00%	-22.28%	-1565.72%
Local 333 United Marine Division RWF	59	72.29%	-9.06%	19.91%	11.96%	78.41%	-2.12%	21.59%	17.67%	7.80%	413.54%
Local 3 IBEW City Employees WF	48	45.33%	-42.97%	5.87%	-66.99%	88.54%	10.53%	11.46%	-37.53%	48.80%	3110.70%
Local 15, 15A, 15C Operating Engineers WF/RWF	38	133.66%	68.15%	30.73%	72.80%	81.31%	1.50%	18.69%	1.86%	-64.39%	-4336.45%
United Probation Officers Assoc RWF	110	54.31%	-31.68%	24.93%	40.20%	68.54%	-14.44%	31.46%	71.45%	20.77%	1266.30%
Assistant Dep Wardens/Dep Wardens WF/RWF/CLRF	2	87.08%	9.55%	13.78%	-22.52%	86.34%	7.78%	13.66%	-25.56%	-0.86%	-156.30%
Local 300 Civil Service Forum RWF	54	76.26%	-4.06%	18.65%	4.87%	80.35%	0.31%	19.65%	7.06%	5.09%	234.93%
Doctors Council RWF	21	115.21%	44.94%	21.81%	22.64%	84.08%	4.97%	15.92%	-13.27%	-37.02%	-2535.80%
UP TO \$1 MILLION CATEGORY AVERAGE	12 FUNDS:	80.70%		17.78%		81.65%		18.35%		1.52%	
NYC CONTRIBUTION \$1 TO \$3 MILLION											
NYC Municipal Plumbers & Pipefitters WF	85	103.29%	17.48%	9.12%	-34.75%	91.89%	6.36%	8.11%	-40.38%	-12.41%	553.89%
United Probation Officers Assoc WF	109	70.77%	-19.51%	26.55%	90.06%	72.72%	-15.84%	27.28%	100.58%	2.67%	-240.72%
Correction Captains Assoc WF/CLRF	6/6.1	81.69%	-7.10%	8.99%	-35.68%	90.09%	4.27%	9.91%	-27.14%	9.33%	-591.40%
Local 1181 CWA Supervisory Employees WF/RWF	32	74.76%	-14.97%	15.06%	7.79%	83.23%	-3.66%	16.77%	23.26%	10.18%	-636.26%
Doctors Council WF	22	126.32%	43.67%	25.12%	79.77%	83.41%	-3.45%	16.59%	21.93%	-51.44%	2610.01%
DC 9 Painting Industry WF/RWF (Local 1969)	20	103.80%	18.05%	8.86%	-36.56%	92.13%	6.64%	7.87%	-42.16%	-12.66%	567.07%
Local 300 Civil Service Forum WF	55	80.87%	-8.03%	13.54%	-3.12%	85.66%	-0.85%	14.34%	5.41%	5.60%	-394.95%
Local 3 IBEW Electricians RWF	50	108.63%	23.55%	12.81%	-8.32%	89.45%	3.54%	10.55%	-22.46%	-21.44%	1029.70%
Civil Service Bar Assoc WF	3	84.91%	-3.43%	14.89%	6.56%	85.08%	-1.52%	14.92%	9.67%	0.20%	-110.62%
1199 SEIU Licensed Practical Nurses WF	68	103.40%	17.60%	20.78%	48.74%	83.27%	-3.63%	16.73%	23.02%	-24.18%	1173.97%
Local 3 IBEW Electricians WF	51	116.51%	32.51%	13.57%	-2.91%	89.57%	3.67%	10.43%	-23.33%	-30.08%	1484.55%
Local 211 Allied Building Inspectors WF	42	59.78%	-32.01%	6.36%	-54.50%	90.39%	4.62%	9.61%	-29.34%	33.86%	-1883.87%
Local 246 SEIU RWF	46	69.72%	-20.70%	13.82%	-1.07%	83.46%	-3.41%	16.54%	21.63%	16.45%	-966.76%
Local 444 Sanitation Officers WF	65	75.10%	-14.59%	6.57%	-52.97%	91.95%	6.43%	8.05%	-40.85%	18.33%	-1065.82%
Local 246 SEIU WF	47	74.69%	-15.05%	13.90%	-0.53%	84.31%	-2.41%	15.69%	15.33%	11.41%	-701.01%
Local 891 School Custodian & Engineers WF/RWF/ED	80	83.21%	-5.37%	21.44%	53.43%	79.51%	-7.97%	20.49%	50.60%	-4.64%	144.61%
Correction Captains Assoc RWF	5	77.29%	-12.10%	6.15%	-55.95%	92.62%	7.21%	7.38%	-45.77%	16.56%	-972.40%
\$1 TO \$3 MILLION CATEGORY AVERAGE	17 FUNDS:	87.93%		13.97%		86.40%		13.60%		-1.90%	
NYC CONTRIBUTION \$3 TO \$10 MILLION											
Local 444 Sanitation Officers RWF	64	78.94%	-13.40%	5.66%	-37.50%	93.31%	2.62%	6.69%	-26.22%	15.40%	-7543.28%
Local 854 Uniformed Fire Officers Assoc WF	77	107.56%	18.00%	5.08%	-43.94%	95.49%	5.02%	4.51%	-50.29%	-12.63%	6005.04%
Superior Officers Council (Police) WF/CLRF	106	88.31%	-3.11%	9.33%	3.02%	90.45%	-0.53%	9.55%	5.36%	2.36%	-1238.40%
House Staff Comm of Interns & Residents WF/Legal	24	83.19%	-8.74%	9.86%	8.89%	89.40%	-1.68%	10.60%	16.86%	6.95%	-3460.29%
Local 1182 CWA Security Benefits Fund WF/RWF/Legal	33	80.46%	-11.73%	16.54%	82.59%	82.95%	-8.78%	17.05%	87.98%	3.00%	-1551.14%
New York City RWF	89	85.40%	-6.31%	6.05%	-33.24%	93.39%	2.70%	6.61%	-27.09%	8.56%	-4234.42%
Local 854 Uniformed Fire Officers Assoc RWF	78	93.02%	2.05%	6.77%	-25.27%	93.22%	2.51%	6.78%	-25.21%	0.21%	-202.16%
Detectives Endowment Assoc WF	16	102.10%	12.02%	10.66%	17.75%	90.54%	-0.43%	9.46%	4.28%	-12.77%	6070.49%
Superior Officers Council (Police) RWF	105	79.20%	-13.11%	8.77%	-3.15%	90.03%	-0.99%	9.97%	9.94%	12.03%	-5914.78%
Local 831 Uniformed Sanitationmen's Assoc WF	73	113.33%	24.33%	11.85%	30.85%	90.53%	-0.44%	9.47%	4.39%	-25.18%	12068.95%
\$3 TO \$10 MILLION CATEGORY AVERAGE	10 FUNDS:	91.15%		9.06%		90.93%		9.07%		-0.21%	

2013 SCHEDULE OF BENEFIT FUND RATIOS

NAME OF FUND	REF	DEVIATION		DEVIATION		DEVIATION		DEVIATION		EXCESS/ TOTAL REV.	DEVIATION FROM CAT. AVERAGE
		BEN EXP/ TOTAL REV.	FROM CAT. AVERAGE	ADMIN EXP/ TOTAL REV.	FROM CAT. AVERAGE	BEN EXP/ TOTAL EXP	FROM CAT. AVERAGE	ADMIN EXP/ TOTAL EXP	FROM CAT. AVERAGE		
<u>SELF-INSURED WF & RWF (continued)</u>											
<u>NYC CONTRIBUTION \$10 TO \$20 MILLION</u>											
Local 1 Council of Supervisors & Admin WF	25	87.06%	10.03%	9.50%	45.21%	90.16%	-2.50%	9.84%	30.68%	3.44%	-76.02%
Organization of Staff Analysts WF/RWF/ED	93	80.46%	1.69%	13.40%	104.73%	85.73%	-7.29%	14.27%	89.57%	6.15%	-57.11%
Local 1 Council of Supervisors & Admin RWF	26	76.98%	-2.71%	10.16%	55.26%	88.34%	-4.47%	11.66%	54.84%	12.86%	-10.29%
Local 94 Uniformed Firefighters Assoc WF	83	71.72%	-9.36%	4.73%	-27.72%	93.81%	1.45%	6.19%	-17.83%	23.55%	64.31%
Correction Officers' Benevolent Assoc RWF	7	84.15%	6.35%	4.29%	-34.50%	95.15%	2.90%	4.85%	-35.64%	11.57%	-19.31%
New York State Nurses Assoc WF	92	66.42%	-16.06%	5.72%	-12.61%	92.07%	-0.43%	7.93%	5.28%	27.86%	94.38%
Local 831 Uniformed Sanitationmen's Assoc RWF	72	66.81%	-15.56%	3.24%	-50.47%	95.37%	3.14%	4.63%	-38.56%	29.95%	108.90%
Correction Officers' Benevolent Assoc WF/CLRF	9	91.60%	15.77%	3.88%	-40.66%	95.93%	3.74%	4.07%	-45.99%	4.52%	-68.46%
Local 237 Teamsters RWF	44	82.35%	4.08%	7.80%	19.16%	91.35%	-1.21%	8.65%	14.87%	9.85%	-31.28%
Local 94 Uniformed Firefighters Assoc RWF	81	82.98%	4.87%	2.69%	-58.85%	96.86%	4.74%	3.14%	-58.26%	14.33%	-0.03%
Detectives Endowment Assoc RWF	15	79.82%	0.89%	6.57%	0.45%	92.39%	-0.08%	7.61%	1.03%	13.60%	-5.10%
\$10 TO \$20 MILLION CATEGORY AVERAGE	11 FUNDS:	79.12%		6.54%		92.47%		7.53%		14.33%	
<u>NYC CONTRIBUTION MORE THAN \$20 MILLION</u>											
Sergeants Benevolent Assoc (Police) WF/RWF/CLRF	113	85.37%	-4.86%	5.42%	-34.09%	94.03%	2.56%	5.97%	-28.18%	9.21%	349.78%
Local 371 Social Service Employees WF/ED/Legal/ADM	62	97.62%	8.79%	9.89%	20.30%	90.80%	-0.97%	9.20%	10.69%	-7.51%	-466.90%
Local 237 Teamsters WF	45	95.86%	6.83%	11.47%	39.41%	89.32%	-2.58%	10.68%	28.50%	-7.32%	-457.64%
Patrolmen's Benevolent Assoc WF/CLRF	97	87.08%	-2.95%	9.19%	11.70%	90.46%	-1.34%	9.54%	14.78%	3.73%	82.23%
Patrolmen's Benevolent Assoc RWF	96	83.90%	-6.49%	7.26%	-11.75%	92.04%	0.38%	7.96%	-4.24%	8.84%	331.69%
Professional Staff Congress CUNY WF/RWF	101	88.92%	-0.90%	3.89%	-52.66%	95.81%	4.49%	4.19%	-49.55%	7.19%	251.09%
Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM	30	94.25%	5.04%	9.44%	14.75%	90.90%	-0.86%	9.10%	9.48%	-3.69%	-280.24%
DC 37 WF	10	86.88%	-3.18%	10.03%	21.96%	89.65%	-2.22%	10.35%	24.50%	3.09%	51.11%
Local 2 United Federation of Teachers WF/RWF	41	87.68%	-2.29%	7.43%	-9.61%	92.18%	0.54%	7.82%	-5.99%	4.89%	138.88%
MORE THAN \$20 MILLION CATEGORY AVERAGE	9 FUNDS:	89.73%		8.22%		91.69%		8.31%		2.05%	
SELF-INSURED FUNDS AVERAGE	59 FUNDS:	85.48%		11.12%		88.32%		11.37%		3.16%	
<u>INSURED WF & RWF</u>											
<u>NYC CONTRIBUTION UP TO \$3 MILLION</u>											
NYC Deputy Sheriffs Assoc RWF	12	108.86%	20.46%	9.41%	-9.38%	92.04%	2.91%	7.96%	-24.67%	-18.27%	2332.10%
NYC Deputy Sheriffs Assoc WF	13	101.04%	11.81%	2.58%	-75.16%	97.51%	9.03%	2.49%	-76.43%	-3.62%	382.37%
Fire Alarm Dispatchers Benevolent Assoc WF	23	71.11%	-21.31%	11.53%	11.08%	86.04%	-3.79%	13.96%	32.13%	17.35%	-2410.29%
Local 333 United Marine Division WF	60	85.98%	-4.85%	16.38%	57.76%	84.00%	-6.08%	16.00%	51.52%	-2.36%	214.43%
Local 30 A-C Operating Municipal Engineers WF/RWF	57	84.84%	-6.12%	12.01%	15.71%	87.60%	-2.06%	12.40%	17.45%	3.14%	-518.61%
INSURED FUNDS AVERAGE	5 FUNDS:	90.37%		10.38%		89.44%		10.56%		-0.75%	
SELF-INSURED AND INSURED FUNDS AVERAGE	64 FUNDS:	86.30%		10.99%		88.50%		11.24%		2.51%	

2013 SCHEDULE OF BENEFIT FUND RATIOS

NAME OF FUND	REF	BEN EXP/ TOTAL REV.	DEVIATION FROM CAT. AVERAGE	ADMIN EXP/ TOTAL REV.	DEVIATION FROM CAT. AVERAGE	BEN EXP/ TOTAL EXP	DEVIATION FROM CAT. AVERAGE	ADMIN EXP/ TOTAL EXP	DEVIATION FROM CAT. AVERAGE	EXCESS/ TOTAL REV.	DEVIATION FROM CAT. AVERAGE
ANNUITY FUNDS											
NYC CONTRIBUTION UP TO \$1 MILLION											
Assistant Dep Wardens/Dep Wardens AF	1	20.11%	-48.96%	4.86%	-33.98%	80.55%	-6.20%	19.45%	37.65%	75.03%	40.93%
NYC Deputy Sheriffs Assoc AF	11	19.01%	-51.76%	0.00%	-100.00%	100.00%	16.46%	0.00%	-100.00%	80.99%	52.12%
Civil Service Bar Assoc AF	130	43.47%	10.32%	7.53%	2.36%	85.24%	-0.74%	14.76%	4.48%	49.00%	-7.96%
Local 3 IBEW Communications Electricians AF	127	34.70%	-11.93%	4.34%	-40.98%	88.88%	3.51%	11.12%	-21.31%	60.96%	-14.49%
Local 444 Sanitation Officers Supplemental AF	133	60.06%	52.44%	7.94%	7.95%	88.32%	2.86%	11.68%	-17.37%	31.99%	-39.91%
Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF	117	45.39%	15.20%	20.16%	174.12%	69.24%	-19.36%	30.76%	117.66%	34.44%	-35.31%
Correction Captains Assoc AF	4	53.07%	34.70%	6.66%	-9.47%	88.85%	3.47%	11.15%	-21.11%	40.27%	-24.37%
TOTAL UP TO \$1 MILLION CATEGORY	7 FUNDS:	39.40%		7.36%		85.87%		14.13%		53.24%	
NYC CONTRIBUTION \$1 TO \$3 MILLION											
Local 300 SEIU Civil Service Forum AF	125	16.78%	-22.71%	5.26%	23.00%	76.12%	-7.29%	23.88%	33.42%	77.95%	5.33%
Local 891(IUOE) AF	126	14.68%	-32.38%	5.36%	25.27%	73.25%	-10.78%	26.75%	49.46%	79.96%	8.04%
Doctors Council AF	124	27.65%	27.37%	2.87%	-32.96%	90.60%	10.35%	9.40%	-47.47%	69.48%	-6.12%
Local 246 SEIU NYC AF	128	27.73%	27.72%	3.63%	-15.31%	88.44%	7.72%	11.56%	-35.41%	68.64%	-7.25%
TOTAL \$1 TO \$3 MILLION CATEGORY	4 FUNDS:	21.71%		4.28%		82.10%		17.90%		74.01%	
NYC CONTRIBUTION \$3 TO 10 MILLION											
DC 37 AFSCME AF	121	36.21%	17.86%	9.88%	246.28%	78.56%	-14.70%	21.44%	171.10%	53.91%	-18.84%
Local 444 Sanitation Officers AF	63	34.61%	12.66%	2.73%	-4.41%	92.69%	0.65%	7.31%	-7.62%	62.66%	-5.67%
Local 1180 CWA Members AF	119	22.03%	-28.29%	2.22%	-22.25%	90.85%	-1.35%	9.15%	15.71%	75.75%	14.04%
Local 854 Uniformed Fire Officers Assoc AF	76	36.50%	18.81%	1.76%	-38.41%	95.40%	3.60%	4.60%	-41.91%	61.75%	-7.05%
Council of Supervisors and Administrators AF	132	21.60%	-29.69%	2.05%	-28.32%	91.35%	-0.81%	8.65%	9.38%	76.36%	14.95%
Detectives Endowment Assoc AF	14	37.37%	21.63%	3.77%	32.26%	90.82%	-1.37%	9.18%	16.00%	58.86%	-11.39%
Superior Officers Council (Police) AF	104	29.80%	-2.98%	1.23%	-56.99%	96.04%	4.29%	3.96%	-49.99%	68.97%	3.83%
Local 30 A-D IUOE Engineers AF	114	25.89%	-15.74%	0.62%	-78.16%	97.65%	6.04%	2.35%	-70.27%	73.49%	10.64%
Sergeants Benevolent Assoc (Police) AF	112	27.50%	-10.49%	1.47%	-48.44%	94.92%	3.07%	5.08%	-35.78%	71.03%	6.93%
Local 94 Uniformed Firefighters Assoc AF	82	33.07%	7.65%	1.18%	-58.61%	96.55%	4.84%	3.45%	-56.40%	65.75%	-1.02%
Correction Officers' Benevolent Assoc AF	8	33.36%	8.59%	4.48%	57.07%	88.15%	-4.28%	11.85%	49.77%	62.16%	-6.42%
TOTAL \$3 TO \$10 MILLION CATEGORY	11 FUNDS:	30.72%		2.85%		92.09%		7.91%		66.43%	
NYC CONTRIBUTION MORE THAN \$10 MILLION											
Local 371 Social Service Employees AF	123	25.53%	-11.04%	5.67%	71.88%	81.82%	-8.56%	18.18%	72.78%	68.80%	1.17%
Patrolmen's Benevolent Assoc AF	95	29.44%	2.59%	2.56%	-22.53%	92.01%	2.83%	7.99%	-24.05%	68.00%	0.00%
Local 237 Teamsters AF	43	25.70%	-10.44%	3.00%	-9.15%	89.55%	0.08%	10.45%	-0.70%	71.30%	4.85%
Local 831 Uniformed Sanitationmen's Assoc AF	71	34.12%	18.90%	1.97%	-40.20%	94.53%	5.65%	5.47%	-48.04%	63.90%	-6.02%
TOTAL MORE THAN \$10 MILLION CATEGORY	4 FUNDS:	28.70%		3.30%		89.48%		10.52%		68.00%	
ANNUITY FUNDS AVERAGE	26 FUNDS:	30.13%		4.45%		87.38%		12.62%		65.42%	
GRAND TOTAL	90 FUNDS:	63.83%		8.38%		88.06%		11.79%		27.67%	

**2013 FUNDS THAT DO NOT USE CPAs
FROM THE COMPTROLLER'S PREQUALIFIED CPA LIST***

1. 1199 SEIU Licensed Practical Nurses WF	28. Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM	55. Local 444 Sanitation Officers Supplemental AF
2. Assistant Dep Wardens/Dep Wardens AF	29. Local 1181 CWA Supervisory Employees WF/RWF	56. Local 444 Sanitation Officers WF
3. Assistant Dep Wardens/Dep Wardens WF/RWF/CLRF	30. Local 1182 CWA Security Benefits Fund WF/RWF/Legal	57. Local 831 Uniformed Sanitationmen's Assoc AF
4. Civil Service Bar Assoc AF	31. Local 14 -14B IUOE WF/RWF	58. Local 831 Uniformed Sanitationmen's Assoc RWF
5. Civil Service Bar Assoc WF	32. Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF	59. Local 831 Uniformed Sanitationmen's Assoc WF
6. Committee of Interns and Residents ED	33. Local 15, 15A, 15C Operating Engineers WF/RWF	60. Local 854 Uniformed Fire Officers Assoc AF
7. Correction Captains Assoc AF	34. Local 211 Allied Building Inspectors WF	61. Local 854 Uniformed Fire Officers Assoc RWF
8. Correction Captains Assoc RWF	35. Local 237 Teamsters AF	62. Local 854 Uniformed Fire Officers Assoc WF
9. Correction Captains Assoc WF/CLRF	36. Local 237 Teamsters RWF	63. Local 94 Uniformed Firefighters Assoc AF
10. Council of Supervisors and Administrators AF	37. Local 237 Teamsters WF	64. Local 94 Uniformed Firefighters Assoc RWF
11. DC 37 AFSCME AF	38. Local 246 SEIU NYC AF	65. Local 94 Uniformed Firefighters Assoc WF
12. DC 37 WF	39. Local 246 SEIU RWF	66. Local No. 5 MNCPL Employees Benefit Trust Fund
13. DC 9 Painting Industry AF (Local 1969)	40. Local 246 SEIU WF	67. NYC DC of Carpenters AF
14. DC 9 Painting Industry WF/RWF (Local 1969)	41. Local 3 IBEW Communications Electricians AF	68. NYC DC of Carpenters WF/RWF
15. Detectives Endowment Assoc AF	42. Local 3 IBEW Electricians RWF	69. NYC Deputy Sheriffs Assoc AF
16. Detectives Endowment Assoc CLRF	43. Local 3 IBEW Electricians WF	70. NYC Deputy Sheriffs Assoc RWF
17. Detectives Endowment Assoc RWF	44. Local 30 A-C Operating Municipal Engineers WF/RWF	71. NYC Deputy Sheriffs Assoc WF
18. Detectives Endowment Assoc WF	45. Local 30 A-D IUOE Engineers AF	72. NYS Court Clerks Assoc RWF
19. Doctors Council AF	46. Local 300 Civil Service Forum RWF	73. NYS Court Officers Assoc RWF
20. Doctors Council RWF	47. Local 300 Civil Service Forum WF	74. Organization of Staff Analysts WF/RWF/ED
21. Doctors Council WF	48. Local 300 SEIU Civil Service Forum AF	75. Pavers & Road Builders District Council WF
22. Fire Alarm Dispatchers Benevolent Assoc WF	49. Local 333 United Marine Division RWF	76. Professional Staff Congress CUNY WF/RWF
23. House Staff Comm of Interns & Residents WF/Legal	50. Local 333 United Marine Division WF	77. Sergeants Benevolent Assoc (Police) AF
24. Local 1 Council of Supervisors & Admin RWF	51. Local 371 Social Service Employees AF	78. Sergeants Benevolent Assoc (Police) WF/RWF/CLRF
25. Local 1 Council of Supervisors & Admin WF	52. Local 371 Social Service Employees WF/ED/Legal/ADM	79. Surrogates & Supreme Court Reporters Assoc RWF
26. Local 1 Plumbing Industry AF	53. Local 444 Sanitation Officers AF	80. United Probation Officers Assoc RWF
27. Local 1180 CWA Members AF	54. Local 444 Sanitation Officers RWF	81. United Probation Officers Assoc WF

* The City of New York Procurement Policy Board Rules ("PPB") authorize the Comptroller to maintain a list of prequalified auditors. PPB rule §3-10(k) states: A Prequalified List of Auditors shall be maintained by the Comptroller in accordance with this section. An agency seeking to award an audit contract shall solicit only those suppliers that have been prequalified by the Comptroller." Directive #12 §5.23 states "Benefit Funds contract only with firms included on the Office of the Comptroller's prequalified list of CPAs." Comptroller's Prequalified CPA List as of April 14, 2016.

THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER

INTERNAL CONTROL AND ACCOUNTABILITY DIRECTIVES

**DIRECTIVE 12 - EMPLOYEE BENEFIT FUNDS - UNIFORM REPORTING AND
AUDITING REQUIREMENTS**

INTRODUCTION AND SUMMARY

This Directive sets forth accounting, auditing and financial guidelines for employee and retiree Benefit Funds which receive contributions from the City of New York. It also establishes detailed information reporting requirements for the funds and their boards of trustees. All Benefit Funds that receive contributions from the City of New York are required to conform with this Directive's provisions.

The accounting, auditing and reporting requirements prescribed herein vary in accordance with the amount of funding the Benefit Fund receives from the City. Benefit Funds are divided into two funding level categories: those with New York City Contributions less than \$300,000 (Level I); and those with \$300,000 or more in New York City Contributions (Level II).

1.0 GENERAL INFORMATION

1.1 Organization

- 1.0 General Information
- 2.0 Definitions
- 3.0 General Guidelines and Requirements
- 4.0 Annual Reporting Requirements
- 5.0 Independent Annual Audit
- 6.0 Trustee Representation Letter
- 7.0 Federal ERISA Reporting Requirements
- 8.0 Annual Report to Fund Membership
- 9.0 Supporting Schedules
- 9.4 Multi-Employer Analysis Schedule

Exhibits:

- A - Administrative Expense Schedule
- B - Benefit Expense Schedule
- C - Key Ratio Schedule
- D - Multi-Employer Analysis Schedule

1.2 Effective Date

This directive is effective for Benefit Fund plan years beginning on or after July 1, 1997.

1.3 Notice

In reissuing this directive, the Office of the Comptroller has undertaken to clarify, whenever possible the prior version's text. In reissuing this directive, there is no intent to change the existing interpretation of any subject unless explicitly stated in the text.

1.4 Assistance

Requests for additional copies and questions concerning this Directive should be addressed to: Joseph Trapani, Chief, Bureau of Management and Accounting Systems, (669-8201), 1 Centre Street, Municipal Building, Room 1005, New York, NY 10007.

2.0 DEFINITIONS

The following define the key terms used in this Directive:

2.5 Benefit Fund

Benefit Funds consist of any welfare or annuity fund that receives contributions from the City of New York. Examples of Benefit Funds include supplemental health care, educational, legal benefit, annuity, and civil/legal representation funds. Benefit Funds may be for either active or retired New York City employees.

2.6 New York City Contribution

The New York City Contribution is the total of the direct payments the City of New York is required, pursuant to applicable collective bargaining agreements, to make to a Benefit Fund on behalf of relevant employees and retirees.

The City of New York, as used herein, is a reference to its constituent agencies which are defined in the Charter of The City of New York, Chapter 52, Section 1150, subdivision 2, as a city, county, borough, or other office, position, administration, department, division, bureau, board or commission, corporation, institution or agency of government, the expenses of which are paid in whole or in part from the City's treasury.

2.7 Benefit Expense

Benefit expenses, as used herein, are the direct costs of providing benefits. These costs include:

- Claims paid by the fund for self-insured benefits.
- Insurance premium payments less any retention charges.
- The cost of providing medical referral services.
- Salaries or other payments to:
 - Attorneys who provide direct legal services to members.
 - Instructors who conduct in-house training for members.
 - Physicians who examine members for workers' disability purposes.
 - Other professionals and consultants who provide services directly to members.

2.8 Administrative Expense

Administrative Expenses are all those costs that are not Benefit Expenses, including, but not limited to:

- Salaries and allowances for the fund's administrative support staff.
- Rents and other occupancy costs.
- Insurance policies for offices, equipment and other general business purposes.
- Fees paid to third party or fund administrators for administrative purposes.
- Miscellaneous fees and commissions.
- Insurance company retention charges.

2.9 Insurance Retention Charges

Insurance Retention Charges represent the portion of the insurance premiums retained by an insurance company to recover the administrative costs of handling benefit payments. Retention charges are applicable only to insured welfare plans.

3.0 GENERAL GUIDELINES AND REQUIREMENTS

3.10 Supplementary Benefit Agreements

The supplementary benefit agreements between the City of New York and the labor unions establish the Comptroller's authority to audit and request specific information from the Benefit Funds, and describe the Funds' underlying reporting responsibilities.

The agreements require, in part, that Benefit Funds maintain accurate records and books of account in conformance with generally accepted accounting principles, file annual trustees' statements with the Office of the Comptroller containing substantiation and other information that the Comptroller shall from time to time prescribe, as per individual Fund supplemental agreements, and obtain annual independent audits of their financial statements. The agreements also specify the Comptroller's right to audit all Benefit Fund expenditures.

The agreements also set forth conflict of interest guidelines. These guidelines provide that Benefit Funds, and all fund trustees, officers and employees are prohibited from directly or indirectly receiving, in connection with the solicitation, sale, service or administration of a Benefit Fund contract, any payment, commission, loan or other thing of value from any entity or individual; and that Benefit Fund trustees, officers or employees may not directly or indirectly receive any payment, commission, loan service or any other thing of value from the Benefit Fund, except that such person may receive employee benefits to which he or she is otherwise entitled, and reasonable compensation for necessary services and expenses rendered or incurred in connection with official duties.

Many of the financial, accounting, auditing and reporting guidelines in this directive replicate, or are derived from, supplementary benefit agreement terms and conditions.

3.11 Accounting Standards

Every Benefit Fund which receives New York City Contributions is required to maintain adequate books of account and related records that will enable it to prepare complete and auditable financial statements on an accrual basis of accounting in conformity with Generally Accepted Accounting Principles.

3.12 Comptroller's Internal Control and Accountability Directives

It is recommended that all Benefit Funds for which the New York City Contribution is \$300,000 or greater (Level II Funds) comply, where applicable, with the Internal Control and Accountability Directives issued by the Office of the Comptroller.

3.13 Spending Guidelines

Benefit Funds should insure that New York City Contributions are spent appropriately and monitored carefully. This includes:

- Restricting their use only for expenditures and programs that directly or indirectly benefit fund members.
- Carefully controlling Administrative Expenses and insuring that they do not exceed a reasonable percentage of total Benefit Fund revenue.
- Insuring that spending for Benefit Fund employee salaries, fees paid to trustees and fees or commissions paid to professionals and service providers are not excessive or unreasonable in relation to the service or product received.

- Using competitive processes to the greatest degree practicable to procure goods and services.

In addition:

- Political and charitable contributions of any kind paid from the New York City Contribution or related investment earnings are prohibited.
- Payments on Benefit Fund contracts or other obligations generally must be made by check drawn on the fund payable directly to the creditor, beneficiary or obligee. Payments, that are not customarily paid by check, including, but not limited to, electronic transfers and imprest fund expenditures, are permissible.

3.14 Service Provider Assessments

The services rendered by consultants shall be assessed at least once every two years. The assessments shall be reported in the board's official minutes and attached to the trustees' representation letter.

It is further recommended, that the work of consultants and all individuals or organizations, with the exception of medical service providers, that are paid for services rendered on a fee or commission basis, be assessed each year with the results reported in the board's official minutes and attached to the trustees' representation letter.

3.15 Investment Policy and Procedures

3.15.1 Trustee Representation Letter

Level II Benefit Funds must attach a copy of their investment policy to the trustee representation letter along with the trustees' certification that the fund has complied with its policy and procedures.

3.15.2 Investment Policy Recommendation

To insure that idle monies are invested judiciously, appropriately safeguarded and accounted for fully, it is recommended that the board of trustees:

- Insure that the fund has a written investment policy which describes the permissible types of investments and the guidelines to be adhered to for each investment type. The policies and procedures should also cover, as appropriate, compliance with ERISA investment guidelines and any statutory or legal restrictions, collateralization, the use and selection of financial institutions such as depositories, custodians and trusts, and the use and selection of financial advisors.

- Conduct annual reviews of the fund's compliance with the investment policies and procedures.
- Insure that the investment policy and procedures are periodically reviewed and revised as necessary to reflect changes in available investment opportunities and market conditions.
- Establish a trustee investment committee, that includes the fund's chief fiscal officer, to oversee the investment function.
- Insure that internal accounting and procedural controls provide an environment which encourages adherence to the fund's investment policies and procedures. The internal controls should:
 - Separate the investment authorization and accounting functions.
 - Insure that investment transactions are fully recorded at an appropriate level of detail.
 - Mandate that all transactions are based on written authorizations.
 - Regularly report on all investment activity to Trustees.
 - Provide for the bonding of appropriate Benefit Fund staff.

3.16 Travel Policy

The board of trustees must establish a written travel policy which sets forth reasonable standards for all out-of-town travel and attendance at conferences, seminars and other events. In addition to establishing guidelines describing when, and for what purposes travel is appropriate, and expenditure limitations for transportation, lodging, meals and other expenses, the policy must require the board of trustees' advance authorization of all out-of-town travel.

3.16.3 Travel Policy Minimum Requirements

The travel policy, at a minimum, must:

- Prohibit first-class travel.
- Provide that reimbursement of expenses will be made only upon submission of a completed request with supporting documents attached.
- Require persons authorized to travel on Benefit Fund business to report to the board of trustees describing the benefits derived from the trip. The reports must be incorporated in the board's official minutes. It is recommended that the reports be in writing.

In addition, it is recommended that the travel policy:

- Place limitations on the number of individuals who attend, as well as the number of times individuals may travel each year for non-essential purposes such as attending general purpose training and educational courses, attending professional development, or industry conferences, or trade shows.
- Establish reasonable per diem rates such as the Federal General Services Administration's per diem rates, by locality, for normal daily travel expenditures.
- State that Level II funds comply with the Comptroller's Internal Control and Accountability Directive 6, *Authorization, Reimbursement and Audit of Travel, Meals, Lodging and Miscellaneous Agency Expenses*.

3.16.4 Travel Reporting Requirements

A copy of the fund's travel policy must be attached to the trustee representation letter. In addition, a summary of all trustee/staff expenditures for conference attendance and out-of-town travel must be submitted annually as part of the trustee representation letter.

3.17 Cost and Expense Allocations

Benefit Funds that share premises with related or other entities will have common Administrative Expenses such as rent, utilities, general management and other general expenses. These costs should be allocated equitably for reporting and accountability purposes. The allocation must be made systematically, applied consistently from year-to-year, and must be reviewed annually. Staff salaries should be apportioned based on records which document the efforts devoted to each entity. An explanation of the fund's allocation methodologies must be attached to the trustee representation letter.

3.18 Competitive Proposals for Insured Benefits and Other Services

Contracts for insured benefits, except for basic medical and hospital augmentations negotiated with the same insurer, must be awarded using a competitive proposal process. Benefit Funds must solicit at least three firms with the appropriate size, experience and qualifications to provide such benefits or services. The board of trustees must prepare a certification for each benefit or service contract which states that a minimum of three proposals were solicited and discloses the date on which the fund solicited the proposals and the names of all companies solicited. The certification must be included in the board's official minutes and be attached to the trustee representation letter.

It is recommended that Benefit Funds, with the exception of medical service providers, use a similar competitive proposal process to choose third party administrators and all other professional service providers.

Additionally, funds should consider using the guidance provided in the City of New York Procurement Policy Board Rules and the Mayor's Office of Contracts' Rules Implementation Memoranda to assist in developing appropriate competitive proposal processes.

3.19 Comptroller's Audits

The fund's books, records and accounts, including the full minutes of the board of trustees' meetings, are subject to review and audit by the Office of the Comptroller.

4.0 ANNUAL REPORTING REQUIREMENTS

This Directive requires Benefit Funds to prepare and submit a number of reports, copies of documents and other materials to the Office of the Comptroller. All required filings must be submitted annually, no later than nine months after the close of the Benefit Funds' fiscal year.

4.20 Funding Levels Defined

Fund filing requirements vary according to the size of the New York City Contribution as indicated below:

- Level I - Benefit Funds for which New York City Contributions are less than \$300,000.
- Level II - Benefit Funds for which New York City Contributions are \$300,000 or more.

4.21 Reporting Requirements Summary

Subsequent sections of this Directive establish Benefit Fund reporting requirements which vary among the two funding levels. To assist boards of trustees and Benefit Funds, a synopsis of reporting responsibilities and requirements, by funding level, along with references to the appropriate sections of the Directive, is provided here:

Annual Independent Auditor's (CPA) Report

- 1) Statement of Net Assets Available for Benefits
- 2) Statement of Changes in Net Assets Avail. for Benefits
- 3) Footnotes to financial statements
- 4) Auditor's opinion on the financial statements
- 5) Administrative Expense Schedule
- 6) Benefit Expense Schedule

Auditor's Management Letter

Trustee Representation Letter

- a) Fund name, address, etc.
- b) Trustee names, addresses, etc.
- c) Fund administrator, name, address, etc.
- d) New York City Contribution
- e) Total Benefit Fund revenue
- f) Number of City employees/retirees
- g) Percent NYC employees to total fund enrollment
- h) Allocation methodologies
- i) Travel policy
- j) Trustee/staff travel report
- k) Payments to trustees
- l) Payments to top five officers/trustees/staff
- m) Fee/commission payments
- n) Benefit plan amendments
- o) Insurer changes
- p) IRS 5500, 5500c or 990
- q) Investment policies and procedures
- r) Audit contract

DIRECTIVE REFERENCE	LEVEL I	LEVEL II
5.0	Yes	Yes
5.3	Yes	Yes
5.3	Yes	Yes
5.3	Yes	Yes
5.4	Yes	Yes
5.3/9.1	Yes ¹	Yes
5.3/9.2	Yes ¹	Yes
5.7	Yes	Yes
6.0	No	Yes
6.1.1	No	Yes
6.1.2	No	Yes
6.1.3	No	Yes
6.1.4	No	Yes
6.1.5	No	Yes
6.1.6	No	Yes
6.1.7	No	Yes
3.8/6.1.8	No	Yes
3.7/6.1.9	No	Yes
3.7.2/6.1.10	No	Yes
6.1.11	No	Yes
6.1.12	No	Yes
3.5/3.9/6.1.13	No	Yes
6.1.14	No	Yes
6.1.15	No	Yes
7.0/6.1.16	No	Yes
3.6/6.1.17	No	Yes
5.5/6.1.18	No	Yes

¹ Fund must provide schedule, however, independent audit is at the fund's option.

ERISA Reports 5500 & 5500C (If filed)

Level I Fund addendum

Annual Membership Report

Exhibits

A - Administrative Expense Schedule

B - Benefit Expense Schedule

C - Key Ratios Schedule

D - Multi-Employer Analysis Schedule

DIRECTIVE REFERENCE	LEVEL I	LEVEL II
7.0/6.1.16	Yes	Yes
7.0	Yes	No
8.0	Yes	Yes
9.1	Yes ¹	Yes
9.2	Yes ¹	Yes
9.3	Yes	Yes
9.4	Yes	Yes

4.22 Filing Address

All filings required by the Directive must be submitted to:

Ms. Auldith Abraham
The City of New York
Office of the Comptroller
Bureau of Audit
1 Centre Street, 11th Floor, Room 1117 North
New York, NY 10007
(212) 669-8048

Directive12@comptroller.nyc.gov

5.0 INDEPENDENT ANNUAL AUDITS

All Benefit Funds must prepare annual financial statements in accordance with Generally Accepted Accounting Principles (GAAP). Each year's financial statements must be audited annually by independent Certified Public Accountants (CPA).

5.23 Auditor Selection

It is strongly recommended that independent certified public accountants be selected through the use of a competitive proposal process. Requests for proposals should be sent to at least three firms with the appropriate size, experience and qualifications to perform the audit. Requests for proposals should incorporate a copy of this directive.

In addition, it is recommended that:

- The audit selection process be completed no later than 60 days after the beginning of the Benefit Fund's calendar or fiscal year. Timeliness in engaging CPAs is important to insure that there is no break in continuity in the auditing process and, if necessary, to facilitate the transfer of information from one firm to its successor.
- Benefit Funds contract only with firms included on the Office of the Comptroller's prequalified list of CPAs. A copy of the list may be obtained from the filing address listed in §4.3 above.

5.24 Audit Standards

The audit must be conducted in accordance with generally accepted auditing standards (GAAS) as promulgated by the American Institute of Certified Public Accountants.

5.25 Audit Scope

The scope of the independent audit for all Benefit Funds must include the following:

- (1) Statement of net assets available for benefits
- (2) Statement of changes in net assets available for benefits
- (3) Footnotes to financial statements

Funds where City contributions are \$300,000 or greater (Level II) are additionally required to provide an Administrative Expense Schedule (Exhibit A) and Benefit Expense Schedule (Exhibit B) which have been audited as part of the independent audit of the basic financial statements.

5.26 Audit Opinion

The auditor's opinion must state whether the financial statements are presented fairly in accordance with generally accepted accounting principles.

5.27 Audit Contract

It is strongly recommended that audit contracts not exceed four years in length. After four years, a new request for proposals should be issued. Additionally, for Level II funds, if the same firm is awarded the contract in a subsequent four year period, the audit firm should be required to assign a different senior manager and partner-in-charge. Benefit funds are strongly encouraged not to award contracts to the same firm for more than two consecutive four-year periods.

The audit contract must require that the audit report be issued within nine months after the close of the fund's calendar or fiscal year and must incorporate procedures, established by the Comptroller, for the Comptroller's audit of the fund. Additionally, for Level II funds, a copy of the audit contract must be attached to the trustee representation letter, and must specify that the audit work papers are subject to review by the Comptroller's Office.

5.28 Peer Review

The independent auditor must provide the Benefit Fund with copies of any peer reviews performed in accordance with the AICPA's guidelines. The Benefit Fund should use the peer reviews as part of their evaluation in selecting an independent auditor.

5.29 Management Letter

Audit contract terms must include a requirement that the auditor issue a management letter when, in the CPA's professional judgment and as per AICPA guidelines, one is merited. The management letter must comment on any material weaknesses or reportable conditions in any of the five elements which make up the Benefit Fund's internal control structure: control environment, risk assessment, information and communication, control activities and monitoring. When appropriate, the management letter should contain recommendations to fund management on how to improve the noted conditions.

In gaining an understanding of the funds internal control structure, the auditor should take special note of the following areas:

- Adequacy of expenditure documentation and approval processes.
- Expense allocations for Benefit Funds that share their premises with other organizations.
- The adequacy and propriety of the fund's investment policies and procedures and of the fund's compliance with them.
- Competitive procurement practices.
- Staff utilization including the reasonableness of staffing in relation to workload requirements.
- All other matters that the auditors consider appropriate for disclosure to the trustees.

If the independent auditors conclude that there are no material weaknesses, the management letter should so indicate.

6.0 TRUSTEE REPRESENTATION LETTER

The boards of trustees of Level II funds must submit a trustee representation letter to the Comptroller annually which summarizes the Benefit Fund's management policies and activities and provides key information about the fund's operation. The trustee representation letter must be signed by all of the fund's trustees and must include an affirmation that, under the penalties for perjury, in accordance with the supplemental agreement, the report is a true and accurate reflection of management's policies and the state of the fund's affairs for the reporting period.

Level I funds have abbreviated requirements which are described in §7.0.

6.30 Trustee Representation Letter Requirements

The trustee representation letter must contain:

- 6.30.5 The Benefit Fund's name, address and telephone number.
- 6.30.6 The names and business addresses of all board of trustee members.
- 6.30.7 The fund administrator's name, address, and telephone number.
- 6.30.8 The total amount of New York City Contributions for the fund's fiscal or calendar year.
- 6.30.9 Total Benefit Fund revenue from all sources.
- 6.30.10 The number of City employee and retiree members at year end.
- 6.30.11 The number of City employees or retirees expressed as a percentage of the total number of covered Benefit Fund members.
- 6.30.12 For Benefit Funds that share premises, staff or other expenses with related or other entities, a description of all cost or expense allocation formulas, including an explanation of the allocation methodology and the basis for distribution. (§3.8.)
- 6.30.13 A copy of the fund's travel policy. (§3.7)
- 6.30.14 A summary of all expenditures for out-of-town travel and attendance at conferences for trustees and staff. The summary should include the name and position of the traveler/attendee, the dates of travel, the destination, the reason for the trip and the total expenditure. (§3.7)
- 6.30.15 A listing of all amounts paid to any trustee and a description of the work or services rendered.

- 6.30.16 A statement disclosing the total remuneration for the five most highly paid individuals from among trustees, officers and staff.
- 6.30.17 The identification of all individuals or organizations paid on a fee or commission basis, including administrators, investment managers, attorneys, accountants and other professional service providers. For each individual or organization, the provider's name and address, a description of the relationship, the fees paid and, if applicable, the amount of funds held or managed must be provided.
- For consultants, a copy of the official board minutes authorizing the hiring of each consultant and the trustees' biennial assessment of the consultants' performance. (§3.5)
- For insured benefit contracts, certification of the competitive selection process as described in §3.9.
- 6.30.18 If any amendments were made to the benefit plan during the year, a copy of the new benefit booklet or other member notification. If there were no changes the representation letter must state so.
- 6.30.19 If any benefits were changed from third party insured to self-insured or vice-versa during the year, the reasons for the change, including a detailed explanation of the advantages and any expected cost savings.
- 6.30.20 If required to file with the IRS, a copy of IRS Form 5500 or 5500C (or IRS Form 990).
- 6.30.21 A copy of the Benefit Fund's investment policy and procedures and the certification described in §3.6.1.
- 6.30.22 A copy of the independent audit contract. (§5.5)

6.31 Substitution of Statements or Filings

Funds may, in lieu of any specific requirement in §6.1 above, substitute copies of statements or filings made pursuant to State or Federal Law. Each substitution must be clearly referenced to its corresponding requirement in §6.1.

7.0 FEDERAL ERISA REPORTING REQUIREMENTS

Funds may choose to comply with the Employee Retirement Income Security Act of 1974's (ERISA) reporting guidelines for Benefit Fund expenditures and activities. ERISA requires that certain Benefit Funds, depending on membership size, file Internal Revenue Service Forms 5500 or 5500C. Funds choosing to comply with ERISA and which are required, under ERISA, to file 5500

or 5500C should provide an information copy to the Comptroller's Office with the trustee representation letter. At the Fund's discretion, a copy of IRS Tax Form 990 filing may be submitted, to the Comptroller's Office, instead of Forms 5500 or 5500C.

Funds with New York City Contributions under \$300,000, (Level I) must attach an addendum to the Comptroller's copy of Form 5500 or 5500C (or Form 990) with the following information:

- The number of City employee members and retirees at year-end.
- Total New York City Contributions for the year.
- Amendments to benefits. If amendments were made, a copy of the new benefit booklet or other membership notification. If there were no amendments, a statement to that effect.

8.0 ANNUAL REPORT TO FUND MEMBERSHIP

Each fund is required to issue an annual report to its membership. A copy of the annual report, with cover letter, must be sent to each member of the fund and be filed with the Office of the Comptroller. The annual report must advise the membership of the financial condition and operations of the fund and advise the membership of significant changes and other important matters. At a minimum, the annual report must include a copy or a condensed version of the most recent independently audited financial statements. This requirement may be fulfilled by publishing the cover letter and report in a fund authorized publication provided that the publication is mailed to each member individually.

9.0 SUPPORTING SCHEDULE REQUIREMENTS

All Benefit Funds are required to provide the following supporting schedules:

9.32 Administrative Expense Schedule

This schedule compares the Benefit Fund's Administrative Expenses for the last two fiscal years, however, three fiscal years of comparable data is required for any year that the result of the Benefit Fund's operations shows a deficit that exceeds five times the fund balance. The format is provided in Exhibit A. A narrative must also be provided by the board of trustees as an attachment, explaining any adverse trends from year to year, or any expense fluctuations in excess of plus or minus fifteen percent from the prior year. This schedule also requires the computation of Administrative Expenses as a percentage of total Benefit Fund revenue.

Benefit Funds with New York City Contributions under \$300,000 (Level I) must attach this schedule to the Comptroller's copy of the ERISA reporting described in Section 7.0. All other funds (Level II) must have this schedule independently audited and included as part of the annual audit report.

9.33 Benefit Expense Schedule

This schedule requests specific information for each benefit provided by the fund. The format is provided in Exhibit B.

Benefit Funds with New York City Contributions under \$300,000 (Level I) must attach this schedule to the Comptroller's copy of the ERISA reporting described in §7.0. All other funds (Level II) must have this schedule independently audited and included as part of the annual audit report submission.

9.34 Key Ratio Schedule

The Key Ratio Schedule requests the comparative analysis of certain Benefit Fund financial indicators for each of the last two years. The format is provided in Exhibit C. Each fund (Levels I and II) must submit this analysis as part of its annual reporting submission, due no later than nine months after the close of its fiscal year.

**THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER**

**INTERNAL CONTROL AND
ACCOUNTABILITY DIRECTIVE 12 SUPPLEMENT**

**FOR FUNDS NOT ESTABLISHED AND MAINTAINED BY
MUNICIPAL LABOR COMMITTEE UNIONS**

This supplement adds Section 9.4, *Multi-Employer Analysis Schedule*, to Section 9.0 of Comptroller's Internal Control and Accountability Directive #12 which was issued on February 28, 1997.

The benefit funds established and maintained by Municipal Labor Committee (MLC) unions pursuant to collective bargaining agreements with the City of New York, have agreed to provide this supplemental information in a separate submission to the Comptroller's Office. All other funds must submit it as part of the annual reporting requirements described in Section 4.0 of the directive.

9.4 Multi-Employer Analysis Schedule

The Multi-Employer Analysis Schedule requires funds to provide:

The number of covered New York City employee and retiree members at year end.

The number of employee and retiree members for each of the fund's five largest non-City contributors at year end.

The number of trustee and/or benefit fund employee members at year end.

The employee and/or retiree member contribution rate for each of the fund's five largest non-City contributors and for the trustees and/or benefit funds.

The format is provided in Exhibit D. Each fund (Level I and II) must submit this analysis as part of its annual reporting submission, due no later than nine months after the close of its fiscal year.

ADMINISTRATIVE EXPENSE SCHEDULE

DESCRIPTION	1993*	1994	1995
Salaries			
% of total Administrative Expense			
Fringe Benefits			
Investment and Custodial Services			
Legal			
Accountant			
Fees and Commissions - Other			
Rent			
Travel and Conference			
Telephone			
Insurance Retention Charges			
Office Equipment and Rental			
Stationery, Printing, Postage, Office Supplies			
Insurance			
Repairs & Maintenance			
Others (Please Describe):			
Total Administrative Expense			
Total Benefit Fund Revenue			
% Administrative/Revenue			

* Required if Fund has a current year's operating deficit in excess of five times its fund balance.

EXPLANATION OF EXPENSE CATEGORIES

EXPENSE CATEGORY	EXPENSES INCLUDED
Salaries	Salaries, Payroll Taxes, Employment Agency Fees
Fringe Benefits	Employee Fringe Benefits and Severance Pay
Investment and Custodial Services	Investment Management and Custodial Services
Legal	Attorney Fees
Accounting	Accountant Fees
Fees and Commissions - Other	Consulting, Third Party Administrators (e.g. Claims Processing), Communications and Publicity, Security, Actuary, Computer Software Design
Rent	Rent, Utilities, Storage, Building and Moving Expenses
Travel and Conference	Trustee Allowances, Meeting Expenses, Dues, Subscriptions, Awards, Auto Expenses
Telephone	Telephone and Telegrams
Insurance Retention Charges	Insurance Company Administrative Charge to handle benefit payments
Office Equipment and Rental	Depreciation, Amortization, Computer Hardware, Furniture and Equipment
Stationery, Printing, Postage, Office Supplies	Publications, Advertising, Messenger, Petty Cash, Microfilm, Records, Photocopy, Computer Supplies
Insurance	Fiduciary Liability, Bonding, Office Insurance
Repairs and Maintenance	Office Cleaning, Repairs and Maintenance
Other	Any other expense that does not fall in above categories. Each expense must be listed separately and described.

BENEFIT EXPENSE SCHEDULE

BENEFIT	DESCRIPTION	IS BENEFIT INSURED/SELF- INSURED	COST OF BENEFIT FOR YEAR	BENEFIT COVERAGE *

* Use key numbers below to indicate coverage categories

1. Member
2. Spouse
3. Children

**BENEFIT FUND
KEY RATIO SCHEDULE**

	1994	1995
Total Revenue		
Administrative Expense		
% of Revenue		
Benefit Expense		
% of Revenue		
Total Expense		
Net Surplus/(Deficit)		
Fund Balance Year-End		
% of Total Revenue		

Exhibit D

MULTI-EMPLOYER ANALYSIS SCHEDULE

Reporting Year _____		
EMPLOYERS	NUMBER OF EMPLOYEE AND/OR RETIREE MEMBERS	CONTRIBUTION PER EMPLOYEE AND/OR RETIREE
New York City		
Five Largest Non-City Contributors: (enter name)		
1)		
2)		
3)		
4)		
5)		
Benefit Fund/Trustee		

COMMONLY FOUND UNACCEPTABLE PRACTICES OF WELFARE FUNDS

<u>AREA</u>	<u>UNACCEPTABLE PRACTICE</u>
Benefit processing system	<ul style="list-style-type: none"> - Funds do not verify eligibility of employees' dependents. Documentation, such as marriage or birth certificates, is not reviewed before processing benefits for members' dependents.
	<ul style="list-style-type: none"> - Funds do not always check the eligibility database before processing benefit claims.
	<ul style="list-style-type: none"> - Funds paid benefits not in accordance with guidelines.
	<ul style="list-style-type: none"> - Funds pay claims without obtaining the proper documentation.
	<ul style="list-style-type: none"> - Funds improperly delay eligibility.
	<ul style="list-style-type: none"> - Benefit payments are made without being reviewed and approved by an individual other than the claims processor.
	<ul style="list-style-type: none"> - Coordination of benefits provisions are not properly applied.
Benefit administration	Funds do not maintain sufficient information concerning members' usage of benefits such as legal services and are therefore unable to assess the prudence of continuing to provide such benefits.
Allocation of common expenses	Expenses are allocated between funds and related entities without: <ul style="list-style-type: none"> - Funds establishing a reasonable basis for the allocation (i.e. contribution rate, number of participants, actual usage). - Funds maintaining supporting documentation that substantiates the percentage of expenses allocated.
Documentation for expenses	<ul style="list-style-type: none"> - Amounts expended by Funds do not have supporting documentation such as approved vouchers, bills and receipts.
	<ul style="list-style-type: none"> - Questionable expenses charged to fund.
	<ul style="list-style-type: none"> - Benefit expenses were not recorded by the Fund.
	<ul style="list-style-type: none"> - Payment to consultants did not specify service rendered, amount, method of compensation or period covered.

COMMONLY FOUND UNACCEPTABLE PRACTICES OF WELFARE FUNDS

<u>AREA</u>	<u>UNACCEPTABLE PRACTICE</u>
Travel and conference expenses	<p>Funds do not follow the following guidelines:</p> <ul style="list-style-type: none"> - The number of conference attendees is not kept to an absolute minimum. - Airfares or group rates are not paid directly to the sponsoring organization, or to the airlines or hotels. Reimbursements to trustees are made without adequate documentation. - Coach airfare or group rates are not used. - Reimbursements are made for personal expenditures (flowers, entertainment, etc.) - Meal advances are not limited. - Reimbursement for local transportation and meals are made despite failure to present properly documented expense vouchers. - Persons attending conferences do not submit written reports on the sessions they attended. - Summary reports were not discussed or recorded at Board of Trustees meetings. - Fund per diem expenses for trustees exceeded IRS guidelines. - Fund officials routinely have business lunches during the day with staff.
Payments to trustees	<ul style="list-style-type: none"> - Trustees received fixed monthly allowances. - Trustees did not submit documentation for such allowances. - Insufficient guidelines for paying trustees for performing fund work.
Written contracts	<p>Funds do not maintain written contracts or agreements with:</p> <ul style="list-style-type: none"> - Consultants - Accountants - Attorneys

COMMONLY FOUND UNACCEPTABLE PRACTICES OF WELFARE FUNDS

<u>AREA</u>	<u>UNACCEPTABLE PRACTICE</u>
Competitive bidding for professional services	<p>Funds do not competitively bid or consider alternative and benefit services providers for the following types of professional services:</p> <ul style="list-style-type: none"> - Consultants (actuary, computer, investments) - Attorneys - Fiduciary liability and bonding insurance - Third party benefit administrators
Retention charges for insured benefits	<ul style="list-style-type: none"> - The funds do not have a formal package of all the solicitation materials including a complete description of benefits, estimated retentions, and all conditions which the successful bidder must meet. - The person responsible for preparing bid specifications and/or compiling experience data needed for the formal bid solicitation is an independent consultant, dependent on commissions for compensation. - Retention charges, expressed as percentage of premiums are higher than the limits established by the NYS Insurance Department. - Commissions expressed as a percentage of premiums are higher than guidelines established by the NYS Insurance Department.
Internal Controls	<p>Funds do not maintain an adequate set of accounting records, including the following:</p> <ul style="list-style-type: none"> - General Ledger - Cash disbursements journal - Cash receipts journal <p>Funds do not:</p> <ul style="list-style-type: none"> - Stamp paid on all vouchers (indicating date and check number) - Segregate incompatible duties between personnel - Prohibit writing checks to cash or bearer

COMMONLY FOUND UNACCEPTABLE PRACTICES OF WELFARE FUNDS

<u>AREA</u>	<u>UNACCEPTABLE PRACTICE</u>
Significant Operating Deficits	- Substantial operating deficits have exhausted the fund's reserve.
	- Funds maintain inadequate level of reserves.
High Administrative Expenses	A significant larger percentage of total revenue was spent on administrative expenses, in comparison to other similar funds.
Postretirement benefits	The Funds financial statements do not present the Plan's obligation to provide health and welfare benefits to participants after retirements (postretirement benefit obligations) as required by generally accepted accounting principles. The effects of the omission of postretirement benefit obligation information of the Plan's financial statements are presumed to be material.
Other	- Cost savings analyses are not performed prior to major purchases (i.e. computer).
	- Work logs are not maintained by professionals to determine actual work performed and time spent.

**Comptroller's Audit Reports on Benefit Funds
Issued in Fiscal Years 1985 to 2016**

<u>Report Number</u>	<u>Title</u>	<u>Date Issued</u>
C 84-202	Allied Building Inspectors Local 211 – International Union of Operating Engineers Welfare Fund	12/14/84
C 83-203	Local 144 Civil Service Division Welfare Fund	01/14/85
C 83-208	Parking Enforcement Agents Local 1182 Security Benefits Fund	03/12/85
C 84-204	New York City Local 246 Service Employees International Union Welfare Fund	04/19/85
C 85-203	Local 300 Service Employees International Union Civil Service Forum Employees Welfare Fund	02/27/86
C 85-202	Correction Officers' Benevolent Association, Inc. Security Benefits Fund	04/07/86
C 85-207	Correction Captains Association Security Benefits Fund	06/25/86
C 83-206	House Staff Benefits Plan of the Committee of Interns and Residents	07/25/86
C 86-202	Superior Officers Council of the New York City Police Department Retiree Health and Welfare Fund	10/03/86
C 86-201	Uniformed Sanitationmen's Association Retirees Welfare Fund Local 831	10/15/86
C 86-203	New York State Court Clerk's Association Retirees Security Benefits Fund	10/22/86
C 86-204	Uniformed Fire Officers Association - Retired Fire Officers Family Protection Plan Local 854	11/18/86
C 86-205	Local 858 International Brotherhood of Teamsters, OTB Branch Office Managers Welfare Fund	05/05/87
C 85-206	Security Benefit Fund Local 832 International Brotherhood of Teamsters	05/08/87
C 86-208	Doctors Council Welfare Fund	08/11/87
C 86-213	Local 721 Licensed Practical Nurses Welfare Fund	11/20/87
C 87-202	Health Benefits Fund and the Retiree's Health and Welfare Fund of the Detectives Endowment Association	05/11/88
C 88-200	Patrolmen's Benevolent Association of the City of New York Retiree Health and Welfare Fund	06/06/88

**Comptroller's Audit Reports on Benefit Funds
Issued in Fiscal Years 1985 to 2016**

<u>Report Number</u>	<u>Title</u>	<u>Date Issued</u>
C 88-203	Local 1182 CWA Parking Enforcement Agents Welfare Fund	09/22/88
C 87-203	Professional Staff Congress - CUNY Welfare and Retiree Welfare Funds	10/13/88
C 88-205	Civil Service Bar Association Welfare Fund	10/19/88
C 88-201	Local 333 United Marine Division Welfare and Retiree Welfare Funds	01/12/89
C 88-207A2	Housing Patrolmen's Benevolent Association Welfare and Retiree Welfare Funds - Legal Services	04/06/89
C 88-204	Local 444 Sanitation Officers Association Welfare and Retiree Welfare Funds	04/20/89
C 88-207B	Housing Patrolmen's Benevolent Association Welfare, Retiree Welfare and Annuity Funds	06/30/89
C 89-205	Correction Officers Benevolent Association Annuity Fund	03/28/90
C 89-203	Local 1180 Communication Workers of America Security Benefits and Education Funds - Benefit Expenditures	04/27/90
C 90-205	NYC Retirees Welfare Fund	06/14/90
C 90-207	Uniformed Fire Officers Association Family Protection Plan	06/18/90
C 90-202	Social Service Employees Union Local 371 Administrative, Welfare, Legal Services and Education Funds	06/28/90
C 90-203	Local 211 International Union of Operating Engineers Allied Building Inspectors Welfare Fund	06/28/90
C 90-209	Local 2 United Federation of Teachers WF	05/06/91
C 90-210	Local 94 Uniformed Firefighters Assoc. RWF	05/04/91
C 90-211	Local 1 Council of Supervisors & Administrators WF	01/23/91
S 91-02	United Probation Officers Association Welfare and Retirement Welfare Fund	10/22/91
7I 93-099	System Audit Report on the General Controls for the Health and Welfare Applications of the Patrolmen's Benevolent Association Health and Welfare Fund	08/30/94
4D 93-050	Patrolmen's Benevolent Association Health and Welfare Fund (Including the Civil Legal Representation Fund)	09/02/94

Comptroller's Audit Reports on Benefit Funds
Issued in Fiscal Years 1985 to 2016

<u>Report Number</u>	<u>Title</u>	<u>Date Issued</u>
FL95-129A	Financial & Operating Practices of the NYC Transit Police Officers Security Benefit Fund	06/20/95
FL95-130A	Financial & Operating Practices of Local 858 - International Brotherhood of Teamsters	06/09/95
FR95-068A	CUNY Faculty Welfare Fund for Retirees Under Agreement No. 3080 7/1/93 - 12/31/93	01/10/95
FR95-115A	The NYC Board of Education United Federation of Teachers (UFT) Welfare Fund Payments Under Agreement (#132)	03/01/95
FR96-059A	NYC Police Department Welfare Fund Payments for Active Employees Covered Under Agreements #A-2145 and #A-2146 - July 1, 1994 to April 7, 1995	12/29/95
FL96-058A	Financial and Operating Practices of the Parking Enforcement Agents Local 1182 Communication Workers of America Security Benefits Fund	06/10/96
FL96-153A	Doctor's Council Welfare Fund	06/20/96
FL96-178A	Fraudulent Claims Paid by the Doctors Council Welfare Fund	06/27/96
FL96-161A	Audit Report on the Financial and Operating Practices of the Local 144 Civil Service Division Welfare Fund July 1, 1993 to June 30, 1994	04/07/97
FL97-077A	Audit Report on the Financial and Operating Practices of the Operating Engineers, Local 30 A-C Municipal Employees Welfare Fund - July 1, 1994 to June 30, 1995	05/08/97
FR97-128A	Audit Report on the NYC Finance Department Welfare Fund Payments for Active Employees Covered Under Agreements #A-3412 and #A-3412-1 for the Period from July 1, 1995, to July 26, 1996	06/24/97
FR98-082F	follow-up Audit Report on the NYC Office of Labor Relations Welfare Fund Retirees Benefit Payments Under Agreements A-1 Through A-127 for the Period March 1996 - August 1996	04/14/98
FR98-083A	Audit Report on Payments Made to Various Welfare Benefit Funds by the New York City Board of Education, for Active Employees and Retirees, for the Period September 1, 1996 to August 31, 1997	06/22/98
FR98-100A	Audit Report on the Financial and Operating Practices of Local 832 International Brotherhood of Teamsters Security Benefits Fund January 1, 1996 to December 31, 1996	06/24/98

**Comptroller's Audit Reports on Benefit Funds
Issued in Fiscal Years 1985 to 2016**

<u>Report Number</u>	<u>Title</u>	<u>Date Issued</u>
FL98-101A	Audit Report on the Financial and Operating Practices of Local 300 Service Employees International Union Civil Service Forum Retiree Welfare Fund July 1, 1994 - June 30, 1995	06/03/98
FL98-090A	Audit Report on the Financial and Operating Practices of Local 1183 Board of Elections Communication Workers of America Welfare Fund October 1, 1994 - September 30, 1995	06/09/98
FL98-143A	Audit Report on the Financial and Operating Practices of Local 1183 Board of Elections Communication Workers of America Retiree Fund October 1, 1994 - September 30, 1995	06/09/98
FL98-194Ab	Audit Report on District Council 37 Benefits Fund Trust and Affiliated Funds' Data Processing Preparation for the Year 2000	03/03/99
FL99-161A	Audit Report on the Financial and Operating Practices of District Council 37 Education Fund July 1, 1996 – June 30, 1997	06/30/99
FL00-074A	Audit Report on the Financial and Operating Practices of the Correction Officers' Benevolent Association Retirees Welfare Fund January 1, 1998 – December 31, 1998	06/05/00
FL00-075A	Audit Report on the Financial and Operating Practices of the Correction Officers' Benevolent Association Welfare Fund January 1, 1998 – December 31, 1998	06/05/00
FL99-162A	Audit Report on the Financial and Operating Practices of District Council 37 Health and Security Plan Trust July 1, 1996 – June 30, 1997	06/12/00
FL00-165A	District Council 37 Benefits Fund Trust	12/22/00
FM00-178A	International Union of Operating Engineers Local 891 Welfare Fund	01/26/01
FL01-095A	Doctor Council Welfare Fund	03/02/01
FL01-094A	Doctors Council Retiree Welfare Fund	03/02/01
FR01-170A	House Staff Benefits Plan and Legal Services Plan of the Committee of Interns and Residents	06/26/01

**Comptroller's Audit Reports on Benefit Funds
Issued in Fiscal Years 1985 to 2016**

<u>Report Number</u>	<u>Title</u>	<u>Date Issued</u>
FL01-085F	Board of Elections Local 1183 Communication Workers of America Retiree Fund	06/22/01
FL01-084F	Board of Elections Local 1183 Communication Workers of America Welfare Fund	06/22/01
FL02-083A	Communication Workers Association Local 1182 Security Benefits Fund	04/12/02
FL02-085A	Detectives Endowment Association Health Benefit Fund-Active Employees	04/23/02
FL02-086A	Detectives Endowment Association Health Benefit Fund-Retirees	04/26/02
FL03-087A	Local 300 SEIU Civil Service Forum Welfare Fund	06/10/03
FL03-088A	Local 300 SEIU Civil Service Forum Retired Employees Welfare Fund	06/10/03
FL03-086A	Sergeant Benevolent Association Health and Welfare Fund	06/30/03
FL03-151A	Local 444 Sanitation Officers Security Benefit Fund	06/30/03
FL04-093A	Local 721 Licensed Practical Nurses Welfare Fund	06/30/04
FL04-094A	Uniformed Fire Officers Association Family Protection Plan	06/30/04
FL04-095A	Uniformed Fire Officers Association Retired Fire Officers Family Protection Plan	06/30/04
FL05-088A	Municipal Employees Welfare Fund of the International Union of Operating Engineers Local Union 15, 15A and 15C	03/29/06
FL05-090A	Local 333 Insurance Fund for New York City Employees	06/26/07
FL05-091A	Local 333 Retirement Insurance Fund for New York City Retirees	06/26/07
FL08-076A	Uniformed Probation Officers Association Welfare Fund	06/30/09
FL08-077A	Uniformed Probation Officers Association Retirement Welfare Fund	06/30/09
FL09-099A	Superior Officers Council Health & Welfare Fund Of the New York City Police Department	09/30/09
FL09-100A	Superior Officers Council Retiree Health & Welfare Fund of the New York City Police Department	09/30/09

**Comptroller's Audit Reports on Benefit Funds
Issued in Fiscal Years 1985 to 2016**

<u>Report Number</u>	<u>Title</u>	<u>Date Issued</u>
FK07-104A	Municipal Employees Welfare Trust Fund of the International Union of Operating Engineers Local 30	12/22/09
FK07-105A	Municipal Retired Employees Welfare Trust Fund of the International Union of Operating Engineers Local 30	12/22/09
FL10-123A	Social Service Employees Union Local 371 Welfare Fund	04/29/11
FL10-124A	Social Service Employees Union Local 371 Administrative Fund	04/29/11
FL10-125A	Social Service Employees Union Local 371 Legal Services Fund and Educational Fund	04/29/11

**2013 AUDITING AND LEGAL COUNSEL FIRMS
USED BY MULTIPLE FUNDS**

TYPE OF SERVICE:

AUDITING

FUNDS

<p align="center">Andrew L. Hult CPA, PLLC</p>	<p>Superior Officers Council (Police) AF Superior Officers Council (Police) RWF Superior Officers Council (Police) WF/CLRF</p>
<p align="center">Armao LLP / Rocco J. Ricciardi, CPA</p>	<p>Local 444 Sanitation Officers AF Local 444 Sanitation Officers Supplemental AF Local 444 Sanitation Officers RWF Local 444 Sanitation Officers WF</p>
<p align="center">Buchbinder Tunick & Company LLP</p>	<p>Correction Officers' Benevolent Assoc AF Correction Officers' Benevolent Assoc RWF Correction Officers' Benevolent Assoc WF/CLRF Local 2 United Federation of Teachers WF/RWF Local 891 (IUOE) AF Local 891 School Custodian & Engineers WF/RWF/ED</p>
<p align="center">Deodat S. Singh CPA PC</p>	<p>Doctors Council AF Doctors Council RWF Doctors Council WF</p>
<p align="center">Ernst & Young LLP</p>	<p>Patrolmen's Benevolent Assoc AF Patrolmen's Benevolent Assoc RWF Patrolmen's Benevolent Assoc WF/CLRF</p>
<p align="center">Furman & Hauswirth CPAs</p>	<p>Sergeants Benevolent Assoc (Police) AF Sergeants Benevolent Assoc (Police) WF/RWF/CLRF</p>

**2013 AUDITING AND LEGAL COUNSEL FIRMS
USED BY MULTIPLE FUNDS**

TYPE OF SERVICE:

AUDITING

FUNDS

<p align="center">Gould, Kobrick & Schlapp, PC CPAs</p>	<p>1199 SEIU Licensed Practical Nurses WF Assistant Dep Wardens/Dep Wardens AF Assistant Dep Wardens/Dep Wardens WF/RWF/CLRF Civil Service Bar Assoc AF Civil Service Bar Assoc WF Correction Captains Assoc AF Correction Captains Assoc RWF Correction Captains Assoc WF/CLRF Council of Supervisors and Administrators AF Detectives Endowment Assoc AF Detectives Endowment Assoc RWF Detectives Endowment Assoc WF Local 1180 CWA Members AF Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM Local 1181 CWA Supervisory Employees WF/RWF Local 1182 CWA Security Benefits Fund WF/RWF/Legal Local 3 IBEW Communications Electricians AF Local 3 IBEW Electricians RWF Local 3 IBEW Electricians WF Local 300 Civil Service Forum AF Local 300 Civil Service Forum RWF Local 300 Civil Service Forum WF Local 333 United Marine Division RWF Local 333 United Marine Division WF Local 371 Social Service Employees AF Local 371 Social Service Employees WF/ED/Legal/ADM Organization of Staff Analysts WF United Probation Officers Assoc RWF United Probation Officers Assoc WF</p>
<p align="center">Irving Kratz</p>	<p>Local 831 Uniformed Sanitationmen's Assoc AF Local 831 Uniformed Sanitationmen's Assoc RWF Local 831 Uniformed Sanitationmen's Assoc WF</p>

2013 AUDITING AND LEGAL COUNSEL FIRMS USED BY MULTIPLE FUNDS

TYPE OF SERVICE:

AUDITING

FUNDS

Loozis & Wegener, CPAs	NYC Deputy Sheriffs Assoc AF NYC Deputy Sheriffs Assoc RWF NYC Deputy Sheriffs Assoc WF
McEnerney, Brady & Company LLC	Local 854 Uniformed Fire Officers Assoc AF Local 854 Uniformed Fire Officers Assoc RWF Local 854 Uniformed Fire Officers Assoc WF
Novak Francella LLC	DC 9 Painting Industry WF/RWF (Local 1969) Local 30 A-C Operating Municipal Engineers WF/RWF Local 30 A-D IUOE Engineers AF
Peter DeCarlo, CPA PLLC	Local 94 Uniformed Firefighters Assoc AF Local 94 Uniformed Firefighters Assoc RWF Local 94 Uniformed Firefighters Assoc WF
Sacco Manfre CPA PLLC	DC 37 AFSCME AF DC 37 WF
SaxBST, LLP	Local 237 Teamsters AF Local 237 Teamsters RWF Local 237 Teamsters WF Professional Staff Congress CUNY WF/RWF
Schultheis & Panettieri, LLP	Local 211 Allied Building Inspectors WF Local 14 –14B IUOE WF/RWF Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF Local 15, 15A, 15C Operating Engineers WF
Steinberg, Steckler & Picciurro, CPAs	Local 3 IBEW City Employees WF Local 306 Municipal Employees WF New York City RWF NYC Muni. Steamfitters & Steamfitter Helpers RWF NYC Muni. Steamfitters & Steamfitter Helpers WF NYC Municipal Plumbers & Pipefitters WF
Tarlow & Co., CPAs	Local 1 Council of Supervisors & Admin RWF Local 1 Council of Supervisors & Admin WF
Wendel-Walowitz, LLC	Local 246 SEIU RWF Local 246 SEIU NYC AF Local 246 SEIU WF

2013 AUDITING AND LEGAL COUNSEL FIRMS USED BY MULTIPLE FUNDS

**TYPE OF SERVICE:
LEGAL COUNSEL**

FUNDS

Barnes, Iaccarino & Shepherd, LLP	DC 9 Painting Industry WF/RWF (Local 1969) Local 333 United Marine Division RWF Local 333 United Marine Division WF Local 1181 CWA Supervisory Employees WF/RWF Local 1182 CWA Security Benefits Fund WF/RWF/Legal
Brady, McGuire & Steinberg, PC	Local 15, 15A, 15C (IUOE) Operating Muni Engineers AF Local 15, 15A, 15C Operating Engineers WF
Bruce K. Bryant	Local 1 Council of Supervisors & Admin RWF Local 1 Council of Supervisors & Admin WF
Greenberg Burzichelli Greenberg PC	Local 30 A-C Operating Municipal Engineers WF/RWF Local 30 A-D IUOE Engineers AF
Holm & O'Hara, LLP	Civil Service Bar Assoc AF Civil Service Bar Assoc WF Correction Captains Assoc AF Correction Captains Assoc RWF Correction Captains Assoc WF/CLRF Local 3 IBEW Communications Electricians AF Local 3 IBEW Electricians RWF Local 3 IBEW Electricians WF
Lichten & Bright	United Probation Officers Assoc RWF United Probation Officers Assoc WF
Michael T. Murray, PC	Patrolmen's Benevolent Assoc AF Patrolmen's Benevolent Assoc RWF Patrolmen's Benevolent Assoc WF/CLRF

**2013 AUDITING AND LEGAL COUNSEL FIRMS
USED BY MULTIPLE FUNDS**

**TYPE OF SERVICE:
LEGAL COUNSEL**

FUNDS

<p>Mirkin & Gordon, PC</p>	<p>Assistant Dep Wardens/Dep Wardens AF Assistant Dep Wardens/Dep Wardens WF/RWF/CLRF Detectives Endowment Assoc AF Detectives Endowment Assoc RWF Detectives Endowment Assoc WF Local 2 United Federation of Teachers WF/RWF Local 300 Civil Service Forum AF Local 300 Civil Service Forum RWF Local 300 Civil Service Forum WF Local 371 Social Service Employees AF Local 371 Social Service Employees WF/ED/Legal/ADM Local 891 School Custodian & Engineers WF/RWF/ED Local 891(IUOE) AF Superior Officers Council (Police) RWF Superior Officers Council (Police) WF/CLRF</p>
<p>Mitchel B. Craner</p>	<p>NYC Muni. Steamfitters & Steamfitter Helpers RWF NYC Muni. Steamfitters & Steamfitter Helpers WF</p>
<p>O'Dwyer & Bernstein, LLP</p>	<p>Sergeants Benevolent Assoc (Police) AF Sergeants Benevolent Assoc (Police) WF/RWF/CLRF</p>
<p>Pryor, Cashman, Sherman & Flynn</p>	<p>Doctors Council AF Doctors Council RWF Doctors Council WF</p>
<p>Ronald Sheckman, et al/Pryor Cashman LLP</p>	<p>Local 854 Uniformed Fire Officers Assoc AF Local 854 Uniformed Fire Officers Assoc RWF Local 854 Uniformed Fire Officers Assoc WF</p>

**2013 AUDITING AND LEGAL COUNSEL FIRMS
USED BY MULTIPLE FUNDS**

**TYPE OF SERVICE:
LEGAL COUNSEL**

FUNDS

<p align="center">Spivak Lipton, LLP</p>	<p>Local 1180 CWA Members AF</p> <p>Local 1180 CWA Municipal Mgt WF/RWF/Legal/ED/ADM</p> <p>Local 246 SEIU NYC AF</p> <p>Local 246 SEIU RWF</p> <p>Local 246 SEIU WF</p> <p>Professional Staff Congress CUNY WF/RWF</p>
<p align="center">Stroock & Stroock & Lavan, LLP</p>	<p>Local 237 Teamsters AF</p> <p>Local 237 Teamsters RWF</p> <p>Local 237 Teamsters WF</p> <p>Local 831 Uniformed Sanitationmen's Assoc AF</p> <p>Local 831 Uniformed Sanitationmen's Assoc RWF</p> <p>Local 831 Uniformed Sanitationmen's Assoc WF</p>
<p align="center">Sullivan, Papain, Block, McGrath & Cannavo, PC</p>	<p>Local 94 Uniformed Firefighters Assoc AF</p> <p>Local 94 Uniformed Firefighters Assoc RWF</p> <p>Local 94 Uniformed Firefighters Assoc WF</p>
<p align="center">Taubman Kimelman & Soroka, LLP</p>	<p>Local 211 Allied Building Inspectors WF</p> <p>Local 444 Sanitation Officers AF</p> <p>Local 444 Sanitation Officers RWF</p> <p>Local 444 Sanitation Officers WF</p>