SEIU National Industry Pension Fund

Withdrawal Liability Valuation as of December 31, 2018

This report has been prepared at the request of the Board of Trustees for the purposes of establishing the basis for withdrawal liability assessments during the 01/01/2019 through 12/31/2019 period. This report may not otherwise be copied or reproduced in any form without the consent of the Board of Trustees and may only be provided to other parties in its entirety. The measurements shown in this report may not be applicable for other purposes.

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January 23, 2020

Board of Trustees
SEIU National Industry Pension Fund
1800 Massachusetts Avenue, NW
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Dear Trustees:

This report summarizes and reviews the Plan's status and experience with respect to employer withdrawal liability. It outlines the withdrawal liability methods adopted and explains the calculation of the amount of liability of a withdrawn employer. It also establishes the basis for assessments of withdrawal liability for withdrawal during the period January 1, 2019 through December 31, 2019.

The actuarial calculations were completed under the supervision of Eli Greenblum, FSA, MAAA, and Enrolled Actuary. The basic participant and financial data used in this report are the same as those used in the actuarial valuation as of January 1, 2019. The benefit provisions included in the calculations are those that were in effect on December 31, 2018. The method described in the PBGC Technical Update 10-3 has been used to account for reductions in benefits that occurred as a result of implementation of the Rehabilitation Plan.

We look forward to reviewing this report with you at your next meeting and to answering any questions you may have.

Sincerely,

Segal

By:

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Senior Vice President and Benefits Consultant

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SEIU National Industry Pension Fund Withdrawal Liability Valuation as of December 31, 2018

Section 1: Actuarial Valuation Summary

Important Information about Withdrawal Liability Valuations

A withdrawal liability valuation is prepared to assist in the determination and assessment of withdrawal liability. It is a forecast of future uncertain obligations of a pension plan. As such, the forecast will never precisely match the actual stream of benefits and expenses to be paid. In order to prepare withdrawal liability valuations, Segal relies on a number of input items. These include:

- **Plan Provisions** Plan provisions define the rules that will be used to determine benefit payments, and those rules, or the interpretation of them, may change over time. It is important for the Trustees to keep Segal informed with respect to plan provisions and administrative procedures, and to review the plan summary included in our report to confirm that Segal has correctly interpreted the plan of benefits. For an employer withdrawing in a particular plan year, the relevant plan provisions are those in effect at the end of the prior plan year.
- **Participant Information** The present value of vested benefits, upon which withdrawal liability for an employer is determined, is based on data provided to the actuary by the plan. Segal does not audit such data for completeness or accuracy, other than reviewing it for obvious inconsistencies compared to prior data and other information that appears unreasonable. It is not necessary to have perfect data for a valuation: the valuation is an estimated forecast, not a prediction. Notwithstanding the above, it is important for Segal to receive the best possible data and to be informed about any known incomplete or inaccurate data.
- **Financial Information** The withdrawal liability valuation is based on the asset values as of the valuation date, typically reported by the auditor. The allocation of the unfunded present value of vested benefits to an employer is based on its detailed obligated contribution information as well as that for other participating employers, as provided by the plan.
- **Actuarial Assumptions** In measuring the present value of vested benefits for withdrawal liability purposes, Segal starts by developing a forecast of the vested benefits to be paid to existing plan participants for the rest of their lives and the lives of their beneficiaries. This requires actuarial assumptions as to the probability of death, withdrawal and retirement. The forecasted benefits are then discounted to a present value. The actuarial model used to develop the present value of vested benefits for withdrawal liability purposes may use approximations and estimates that will have an immaterial impact on our results. In addition, the actuarial assumptions may change over time, and while this can have a significant impact on the reported results, it does not mean that the previous assumptions or results were unreasonable or wrong.

Given the above, the user of Segal's withdrawal liability valuation report (or other actuarial calculations) needs to keep the following in mind:

- The withdrawal liability valuation report is prepared for use by the Trustees. It includes information relative to the provisions of ERISA pertaining to withdrawal liability. Segal is not responsible for the use or misuse of its report, particularly by any other party.
- A withdrawal liability valuation is a measurement as of a specific date — it is not a prediction of a plan's future financial condition. Accordingly, Segal did not perform an analysis of other potential financial measurements.
- The measurements in this report are not necessarily appropriate for assessing the sufficiency of Plan assets to cover the estimated cost of settling the Plan's benefit obligations or the need for (nor the amount of) future contributions.
- Segal does not provide investment, legal, accounting, or tax advice. This withdrawal liability valuation report is based on Segal's understanding of applicable guidance in these areas and of the plan's provisions, but may be subject to alternative interpretations. The Trustees should look to their other advisors for expertise in these areas.
- While Segal maintains extensive quality assurance procedures, a withdrawal liability valuation involves complex computer models and numerous inputs. In the event that an inaccuracy is discovered after presentation of Segal's results, Segal may revise that valuation report or make an appropriate adjustment in the next valuation.
- Segal's withdrawal liability report shall be deemed to be final and accepted by the Trustees upon delivery and review. Trustees should notify Segal immediately of any questions or concerns about the final content.

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

Significant Issues in Valuation Year

1. The unfunded vested liability as of December 31, 2018 is $920.5 million, excluding Affected Benefits pools (discussed below), representing an increase of $19.1 million from the prior year. After writing down prior pools by 5%, a new positive pool of $90.7 million was created. In addition, a positive "reallocated pool" of $0.7 million was established, representing the portion of withdrawal liability that was determined as not assessable or not collectible from withdrawn employers in 2018. The total unfunded liability as of December 31, 2018, including Affected Benefits pools, is $1,000.8 million compared to $988.5 million as of the prior year.

2. The increase in the Unfunded Vested Liability this year was primarily due to a market value investment return of -2.8% during 2018, partially offset by an increase in PBGC interest rates.

3. There were no changes in actuarial assumption in this valuation.

4. A simplified approach is used under PBGC Technical Update 10-3 for measuring withdrawal liability to adjust for benefit reductions under a Rehabilitation Plan. Under this method, a special Rehabilitation Plan change ("Affected Benefits") pool is recognized at the end of each year in which adjustable benefit reductions are adopted in bargaining and become effective. Because all active participants are now covered by a schedule of the Rehabilitation Plan, no new such pool was established this year. The sum of the remaining balances of all Affected Benefits Pools (now $80.3 million) will be allocated in the same manner as the new 2018 pools.

5. Plan changes adopted in conjunction with the Rehabilitation Plan are reflected in this report. Under PPA'06, benefit reductions made while the Plan is in critical status are to be disregarded for withdrawal liability purposes. These adjustable benefit reductions are included in the Affected Benefits pools.

6. MPRA also provides that contribution rate increases that go into effect after December 31, 2014 pursuant to a Rehabilitation Plan are disregarded in determining the allocation of unfunded vested liabilities and in determining the highest contribution rate for a payment schedule, although this does not apply to additional contributions that are used to provide an increase in benefits.

Summary of Key Results

	December 31, 2017	December 31, 2018
Demographic Data:		
• Number of pensioners and beneficiaries	19,893	20,849
• Number of inactive vested participants	42,785	43,711
• Number of active vested participants	25,755	25,073
Interest Assumptions:		
• Valuation (funding) interest rate	7.25%	7.25%
• PBGC interest rates	2.34% for 20 years, 2.63% thereafter	2.84% for 20 years, 2.76% thereafter
Present Value of Vested Benefits:		
• Present value of vested benefits at funding interest rate	$1,556,581,226	$1,584,501,994
• Present value of vested benefits at PBGC rates, including allowance for expenses	2,941,493,116	2,789,162,609
• Present value of vested benefits for withdrawal liability purposes	2,139,524,392	2,089,360,202
Unfunded Vested Liability:		
• Market value of assets[1]	$1,238,146,139	$1,168,903,191
• Unfunded vested liability for withdrawal liability purposes (excluding Affected Benefits pools)	901,378,253	920,457,011
• Unamortized balance of Affected Benefits pools	87,159,134	80,309,979
• Total unfunded vested liability	988,537,387	1,000,766,990
Withdrawal Liability Pools Established:		
• Basic pool	($2,535,766)	$90,662,584
• Reallocated pool	1,003,529	731,761

[1] *Excludes $7,445,314 and $16,411,925 in withdrawal liability contributions receivable in 2017 and 2018, respectively.*

Section 2: Actuarial Valuation Results

A. Determination of Withdrawal Liability

The Multiemployer Pension Plan Amendments Act of 1980 (MPPAA) requires assessment of withdrawal liability on an employer that withdraws from the Plan. In general, “withdrawal” means the employer has permanently ceased operations under the Plan or has permanently ceased to have an obligation to contribute to the Plan.

Determination of Unfunded Vested Liability

The amount of withdrawal liability is based on the Plan’s unfunded vested liability at the time of withdrawal. The “unfunded vested liability” refers to the value of vested benefits not covered by assets.

For withdrawal liability purposes, “vested benefits” are the benefits that are considered non-forfeitable if the participant incurs a permanent break in service. The value of these benefits is based on the Plan provisions as of the same date.

Determinations of the value of the liability for vested benefits are based on a set of actuarial assumptions. The law prescribes that the assumptions and methods used must be reasonable in the aggregate and “offer the actuary’s best estimate of anticipated experience under the plan.” It also authorizes the PBGC to promulgate assumptions and methods for use by the Plan’s actuary. However, the PBGC has not yet promulgated any assumptions or methods.

The actuarial assumptions and methods are reasonable (taking into account the experience of the Plan and reasonable expectations) and, in combination, represent the actuary’s best estimate of anticipated experience under the Plan to determine the unfunded vested benefits for withdrawal liability purposes.

The interest rate is based on a blend, which includes rates selected based on estimated annuity purchase rates for benefits being settled, because withdrawal liability is a final settlement of an employer’s obligations to the Plan. For benefits that could be settled immediately, because assets on hand are sufficient, the annuity purchase rates are those promulgated by PBGC under ERISA Sec. 4044 for multiemployer plans terminating by mass withdrawal on the measurement date. For benefits that cannot be settled immediately because they are not currently funded, the calculation uses rates equal to the interest rate used for plan funding calculations.

Allocation

The Plan's method of allocation is fully described in *Section 3, Exhibit A*. Briefly, the method involves prorating the unfunded vested liability as of December 31, 1979 plus (or minus) a proration of changes in that figure in each subsequent year before withdrawal. The original unfunded vested liability and each year's change are subject to 5% annual write-downs. This method is known as the "presumptive method" and is the method adopted by the Trustees.

Also added to the total amount to be allocated for possible withdrawal liability are amounts not collected because of bankruptcy, deductibles subtracted from amounts actually assessed, or other limitations on withdrawal assessments specified by law. These uncollected or nonassessable amounts are reallocated among the employer accounts and are also subject to 5% annual write-downs.

As of December 31, 2018, the actuarial present value of vested Plan benefits for withdrawal liability purposes (excluding Affected Benefits pools) is $2,089,360,202. Since the market value of assets as of the same date is $1,168,903,191, the unfunded vested liability for withdrawal liability purposes is $920,457,011.

Each year (if applicable), a new Affected Benefits pool is created representing the present value of vested benefits that were eliminated during the year due to implementation of the Rehabilitation Plan. This pool is amortized over 15 years at the interest rate used for plan funding (for the Plan Year for which the pool was established). The unamortized value of all Affected Benefits pools is added to the figure above to determine the total unfunded vested liability. No such pool was established for the Plan Year ending December 31, 2018. The unamortized value of all Affected Benefits pools as of December 31, 2018 is $80,309,979; therefore, the total unfunded vested liability is $1,000,766,990.

The PBGC has affirmed that a multiemployer plan may assess withdrawal liability to employers that withdraw even if the plan currently has no unfunded vested liability.

De minimis

Each withdrawal liability assessment is the total of the unamortized balances of the allocation amounts, as defined above, less a *de minimis* deductible. The deductible is $50,000 but not more than ¾% of the Plan's unfunded vested liability. This deductible amount is reduced, dollar for dollar, by the amount by which the total of charges prorated to the employer exceeds $100,000.

Payment of Withdrawal Liability

The total amount of an employer's withdrawal liability is not ordinarily payable in a lump sum. The law sets forth a basis for calculating annual amounts, to be paid in quarterly installments unless the plan has fixed some other schedule, and there is a 20-year payment maximum. The payment schedule adopted by the Trustees is more fully detailed in *Section 3, Exhibit A.*

Under certain circumstances, as allowed by ERISA, the Trustees may require immediate payment of withdrawal liability assessments.

Payments in advance may be discounted though the Trustees have not set a rule as to discount terms. Annual payments cease when the total liability and interest have been paid. The law imposes a 20-year maximum payment schedule. Interest discounting is applied at the valuation funding interest rate.

B. Unfunded Vested Liability

The determination of the unfunded vested liability is based on the actuarial assumptions and methods and plan of benefits described in *Section 4* of this report.

Changes Since Prior Year

The following assumption change was made since last year's determination, effective December 31, 2018:

- PBGC interest rates changed, from 2.34% for 20 years and 2.63% thereafter, to 2.84% for 20 years and 2.76% thereafter.

Basic Pools

The Plan's unfunded vested liability for withdrawal liability purposes for each of the past 20 plan years are detailed below.

The chargeable change amount is determined as the unfunded vested liability for a given year less the greater of the sum of the previous unamortized balances or zero. The unamortized balance of each chargeable change is equal to the initial amount with a 5% write-down each year since the establishment of said amount.

BASIC POOLS AS OF DECEMBER 31, 2018

Plan Year Ended December 31	Unfunded Vested Liability	Chargeable Change	Unamortized Balance of Chargeable Change
1999 – 2001	$0	$0	$0
2002	237,275,672	237,275,672	47,455,134
2003	207,176,335	(18,235,553)	(4,558,888)
2004	318,017,972	121,793,642	36,538,093
2005	309,123,374	8,147,090	2,851,482
2006	221,877,099	(69,797,233)	(27,918,893)
2007	265,952,386	58,034,470	26,115,512
2008	374,938,539	125,847,056	62,923,528
2009	564,231,249	212,445,967	116,845,282
2010	596,269,534	65,813,840	39,488,304
2011	748,590,819	189,387,534	123,101,897
2012	803,897,811	101,842,615	71,289,831
2013	799,404,334	47,134,279	35,350,709
2014	842,323,777	96,903,911	77,523,129
2015	916,670,702	133,176,591	113,200,102
2016	975,624,636	124,442,426	111,998,183
2017	901,378,253	(2,535,766)	(2,408,978)
2018	920,457,011	90,622,584	90,662,584
Total			**$920,457,011**

Reallocated Amounts

Withdrawing employers are charged with prorated shares of the “nonassessable” or “uncollectible” liabilities that are reallocated. Reallocation is more fully described in *Section 3, Exhibit A.*

Each annual reallocated amount is written down by 5% of the original amount for each full year from the date that it was originally determined to the end of the plan year preceding withdrawal. The reallocated pools for each of the past 20 plan years are shown below.

REALLOCATED POOLS AS OF DECEMBER 31, 2018

Plan Year Ended December 31	Initial Value	Unamortized Balance
1999 – 2003	$0	$0
2004	201,490	60,447
2005	332,556	116,395
2006	309,377	123,751
2007	1,560,668	702,301
2008	4,753,963	2,376,982
2009	1,086,260	597,443
2010	5,266,915	3,160,149
2011	2,678,722	1,741,169
2012	3,793,197	2,655,238
2013	6,014,428	4,510,821
2014	282,304	225,843
2015	4,992,241	4,243,405
2016	2,908,061	2,617,255
2017	1,003,529	953,353
2018	731,761	731,761
Total		**$24,816,313**

Affected Benefits Pools

The Affected Benefits pools (as described in PBGC Technical Update 10-3) represent the present value of vested benefits that were eliminated each year due to implementation of the Rehabilitation Plan. These pools are amortized over 15 years at the interest rate used for plan funding for the Plan year for which the pool was established.

The 2010 pool reflects adjustable benefit reductions for the vested active employees whose employer adopted a Rehabilitation Plan schedule by December 31, 2010, and all inactive vested employees. Each annual pool thereafter reflects the reductions in adjustable benefits for vested active employers whose employer adopted a Rehabilitation Plan Schedule by December 31 of that year. As of January 1, 2016, all current vested active employees were covered by a schedule of the Rehabilitation Plan and no new Affected Benefits Pools were established.

AFFECTED BENEFITS POOLS AS OF DECEMBER 31, 2018

Plan Year Ended December 31	Initial Value	Unamortized Balance
2010	$43,142,314	$25,886,999
2011	18,294,397	12,139,389
2012	36,195,775	26,156,749
2013	17,607,718	13,691,986
2014	2,613,854	2,166,216
2015	306,559	268,640
Total		**$80,309,979**

Merger Pools

When a plan that merges into the NIPF has unfunded vested benefits for withdrawal liability purposes, a merger pool is established as of the December 31 immediately following the date of merger.

In accordance with PBGC regulations, withdrawals occurring in the first complete plan year following the date of merger are treated as if the merger did not occur. In other words, if the withdrawing employer joined the plan through the merger, withdrawal liability is assessed based on the prior plan actuary's determination of withdrawal liability as of the end of the last complete plan year and allocated according to the prior plan's rules, or as specified in the merger agreement. Withdrawal liability for other employers is determined without regard to the liabilities and assets attributable to the merger.

In subsequent years, if the withdrawing employer was a contributing employer under the prior plan, withdrawal liability is assessed based on an allocation of the merger pool and any plan-wide pools established after the year in which the merger occurred. Assessments to other employers are based on all existing plan-wide pools but without regard to the merger pool. The allocation procedures are discussed in detail in Section 3, Exhibits A, B and C.

The following chart shows the one merger pool established to date.

MERGER POOLS AS OF DECEMBER 31, 2018

Merged Plan	Established as of December 31	Unfunded Vested Liability	Unamortized Balance as of December 31, 2018
SEIU Local 49 Pension Plan	2003	$4,554,958	$1,138,740

C. Withdrawal Liability Experience

For the last plan year, we understand that the Fund received $8,363,086 in cash withdrawal liability payments, as reported in the 2018 Schedule MB. These serve to fund the Plan in the same manner as employer contributions.

An employer is entitled to be advised, upon its request, of the amount of its potential withdrawal liability.

It is advisable for the Fund to maintain a reserve against outstanding withdrawal liability assessments that are deemed uncollectible. Otherwise, the total of outstanding assessments may come to be viewed as Plan assets. The basis for setting such a reserve is, we believe, a matter for the Trustees, subject of course to any advice that legal counsel may offer and to a finding by the auditor that it is reasonable.

The Plan's Trustees, auditor, counsel, or administrator may have basis for a realistic appraisal. In any event, it may be a difficult judgment to make.

EXHIBIT A - METHOD FOR ALLOCATING WITHDRAWAL LIABILITY

The Plan determines the liability of an employer that has completely withdrawn on the basis of the statutory presumptive method defined in Section 4211(b) of ERISA.

The liability of an employer for complete withdrawal from the Plan is determined as the sum of the unamortized balances, as of the end of the Plan Year preceding withdrawal, of the employer's prorated shares of each of the following:

- the Plan's unfunded vested liability as of December 31, 1979;
- the change in the Plan's unfunded vested liability as of the end of each subsequent Plan year (to the end of the Plan year preceding withdrawal); and
- reallocated amounts that would have been payable to the Plan as withdrawal liability payments for withdrawals in preceding years, except that they were nonassessable under certain statutory provisions or not collectible;
- amounts representing the present value of vested benefits eliminated due to implementation of the Rehabilitation Plan (Affected Benefits).

Unamortized Balances

The "unamortized balance" of each of these sources of liability assessment (other than Affected Benefits pools) is determined by reducing each figure by 5% of its original amount for each full year from the end of the Plan Year as of which the charge was originally determined to the end of the Plan Year immediately preceding withdrawal.

Initial Amount

The Plan's unfunded vested liability as of December 31, 1979 was determined by subtracting the market value of Plan assets from the value of vested benefits under the Plan.

Annual Changes

The change in the Plan's unfunded vested liability as of the end of any Plan year is generally determined as follows:

- by establishing the Plan's unfunded vested liability as of the end of that Plan year, and
- by subtracting the total, not less than zero, of (a) the unamortized balance of the unfunded vested liability as of December 31, 1979 and (b) the unamortized balances of each previous annual change after December 31, 1979.

A "positive" change represents an unfunded vested liability greater than the total of the unamortized balances and is an addition to potential liability assessments for future withdrawals. A "negative" change represents an unfunded vested liability lower than the total of unamortized balances and is a credit against amounts that would otherwise determine potential liability assessments for future withdrawals.

Reallocated Amounts

The total amount, if any, of unfunded vested liability determined in any Plan year after December 31, 1979 to be nonassessable or uncollectible with respect to employers that withdrew is established as an amount to be prorated among each of the participating employers as an additional withdrawal liability amount. Nonassessable amounts consist of amounts deducted under the *de minimis* rule (ERISA Section 4209), amounts not payable because of the 20-year limit (ERISA Section 4219(c)(1)), and amounts not payable because of the limitations in the event of sale of all of the employer's assets (ERISA Section 4225). Uncollectible amounts consist of amounts that the Trustees have determined are uncollectible for reasons arising out of cases under federal bankruptcy law or similar proceedings. They also include any other amount of assessed liability determined by the Plan's Trustees to be uncollectible.

Each annual amount of reallocable nonassessables and uncollectibles is written down by 5% of the original amount for each full year from the date as of which it was originally determined to the end of the Plan year preceding withdrawal.

Affected Benefits

A pool is added to the total amount representing the value of vested benefits that were eliminated during the year due to implementation of the Rehabilitation Plan. This pool, called the Affected Benefits pool, is amortized over 15 years at the interest rate used for plan funding for the Plan Year for which the pool is established.

Proration to the Employer

For determining the amount of its liability in the event of its complete withdrawal, the initial amount of unfunded vested liability, each annual change in the unfunded vested liability and each annual reallocable amount of nonassessable and uncollectible amounts is prorated to an employer on the basis of a ratio of contributions. The ratio is the employer's obligated contributions to the Plan to total employer contributions made to the Plan during an "apportionment base period," consisting of the 5 years ending with the end of the Plan year as of which each of the amounts was determined.

Employer surcharges payable under the Rehabilitation Plan are not included in any of the figures used to determine the ratio while supplemental contributions in effect through December 31, 2014 are included for all purposes. Beginning January 1, 2015, new increases in supplemental contributions are also excluded from the ratio, as required by the Multiemployer Pension Reform Act of 2014 (MPRA).

The total of employer contributions with respect to an apportionment base period is reduced by any contributions otherwise included in the total that were made by employers that withdrew from the Plan in or before the plan year in which the change or reallocation arose. The total is also reduced by any employer surcharges paid to a plan that resulted from the plan being in critical status under PPA '06. MPRA provides that contribution increases that go into effect after December 31, 2014 pursuant to a Rehabilitation Plan are also disregarded.

The unamortized balances of Affected Benefits pools are allocated based on the ratio of contributions (as described above) for the 5 years ending as of the year prior to an employer's withdrawal.

Payment of Withdrawal Liability

A withdrawn employer's withdrawal liability assessment is payable in quarterly installments unless the Plan has fixed some other schedule. The quarterly installment is calculated as one-fourth of the product of:

- The average base units in the three consecutive years that produce the highest average within the 10-year period ending before the plan year of withdrawal, and
- the highest contribution rate in the 10-year period ending with the plan year of withdrawal.

Per MPRA, any contribution surcharges accruing on or after December 31, 2014 or any increases in the contribution rate required under a Funding Improvement or a Rehabilitation Plan that go into effect after December 31, 2014 are excluded from the determination of the highest rate in the 10-year period described above.

The number of quarterly installments is calculated on the basis of the amount of withdrawal liability and interest at the actuarial valuation rate used for funding purposes. Payments are limited to a maximum of 20 years.

The Plan has adopted a monthly schedule for withdrawal liability payments.

Maintenance of Allocations

Even if no employer withdrawals had occurred, an annual determination of the Plan's unfunded vested liability, and of any reallocable uncollectible withdrawal liability amounts, is required. The Plan must be in a position to allocate liability to any particular employer based on its contribution history. These procedures and records are necessary in order to be able to determine an assessment should withdrawal occur and also to respond to an inquiry from a participating employer as to the amount of its potential liability.

Partial Withdrawal

The withdrawal may also be partial. A "partial withdrawal" occurs if there is a 70% decline in the number of contribution base units or there is a partial cessation of the employer's obligation to contribute. A 70% decline occurs if the contribution base units in the plan year and the preceding two plan years (the testing period) are less than 30% of contribution base units for the high base year.

The "high base year" is the average of the base units in the two plan years in which the base units were the highest within the five plan years preceding the testing period. A partial withdrawal may also occur if an employer ceases to have an obligation to contribute under one or more, but not all of its collective bargaining agreements, and continues work in the jurisdiction, or if the employer permanently ceases to be obligated to contribute for work performed at one or more, but not all, of the facilities covered but continues the work at that facility.

Under a partial withdrawal, the amount of liability is equal to the amount of withdrawal liability for a complete withdrawal (net of any deductible), multiplied by a fraction, which is one minus a ratio. The ratio is that of the employer's contributory hours in the plan year following the year of the partial withdrawal to the employer's average contributory hours in the five plan years preceding the year of the partial withdrawal.

Plan Reentry

PBGC has issued regulations describing the procedure to be followed in the event an employer reenters the Plan after incurring withdrawal liability. Withdrawal liability will be abated if the post-reentry level of contributory hours exceeds 30% of the average of the contributory hours in the two plan years in which the hours were the highest within the five plan years preceding the plan year of withdrawal, provided the employer posts a bond or escrow account equal to 70% of the withdrawal liability payments otherwise due. In the event of a withdrawal following reentry, the withdrawal liability is adjusted to reflect prior withdrawal liability payments.

The Plan's Withdrawal Liability Policy for New Employers

New employers join this plan on a regular basis. Employers who first had an obligation to contribute after April 29, 1990 will not be obligated for withdrawal liability during a five-year free trial period. This waiver of withdrawal liability will not apply to an employer for a plan year in which the employer's obligated contributions are 2 percent or more of the sum of all employer contributions, or in the event the employer previously avoided withdrawal liability because of this provision.

The Plan's Withdrawal Liability Policy for Mergers

Mergers of other pension plans into this plan have occurred on a regular basis. When a merger occurs, current rules require a separate determination of the unfunded vested liability for the merging group and separate withdrawal liability allocation until after the initial plan year. The "initial plan year" is the year after any first partial year in which the group participates.

If the plan has withdrawal liability at merger, after the initial plan year, there is a priority allocation to employers who joined the plan through merger during the past 20 years, based upon the prior plan's unfunded vested liability at the time of merger, adjusted to the next December 31, and reduced by five percent of that amount for each year thereafter.

The SEIU Local 49 Pension Plan merger in 2003 is the only merger with the NIPF for which the merging plan was determined to have withdrawal liability. The following allocation procedures have been agreed to for withdrawals occurring in 2005 or later:

- The vested liability for the Local 49 Plan was determined on the first NIPF determination date (December 31) on or after the merger date. Since the merger date was June 1, 2003, the determination date was December 31, 2003.
- The assets for the merging plan were the assets transferred at merger as certified in the NIPF audited financial report as of December 31, 2003. This amount was adjusted by adding any additional employer contributions from merging job sites plus a prorated share of NIPF investment return from the merger date through the end of the year. This amount also was adjusted by subtracting any benefit payments to merged participants from the merger date through the end of the year.
- Using the above procedure, the resulting unfunded vested liability (or Withdrawal Liability "merger pool") for the Local Plan was $4,554,958 as of December 31, 2003.

- For a Local 49 employer who withdraws in 2005 or later, the assessment (before any deductible) is based upon:
  - (a) The remainder of the “merger pool” written down 5% for each year after December 31, 2003, allocated to Local 49 employers based upon their prorated share of contributions to the Local 49 Plan for the last five full plan years prior to the merger date, plus
  - (b) A prorated share of the plan-wide pools created as of December 31, 2004 and later. These pools are allocated to all NIPF employers including the Local 49 employers. Allocation of these pools is based upon employer contributions pre and post-merger.

This write-down and new pool establishment process will continue until the merger pool finally is exhausted.

EXHIBIT B - EMPLOYER WITHDRAWAL LIABILITY WORKSHEET FOR WITHDRAWALS FROM JANUARY 1, 2019 THROUGH DECEMBER 31, 2019
(NOT APPLICABLE TO FORMER LOCAL 49 PLAN EMPLOYERS)

Employer Name:						
	Unamortized Balance of Withdrawal Liability Pools			Contributions During 5-Year Period Ending With Date Pool Established		
Year Ended December 31[1]	Basic Pools	Reallocated Pools	Affected Benefits Pools	Total Plan Contributions	Obligated Employer Contributions	Liability Allocated: [(6) ÷ (5)] x [(2) + (3) + (4)]
(1)	(2)	(3)	(4)	(5)	(6)	(7)
2002	$47,455,134	$0	N/A	$140,754,486	$	$
2003	(4,558,888)	0	N/A	150,936,180		
2004	36,538,093	60,447	N/A	162,472,680		
2005	2,851,482	116,395	N/A	173,635,603		
2006	(27,918,893)	123,751	N/A	183,095,035		
2007	26,115,512	702,301	N/A	191,086,522		
2008	62,923,528	2,376,982	N/A	198,119,385		
2009	116,845,282	597,443	N/A	203,044,985		
2010	39,488,304	3,160,149	N/A	207,848,001		
2011	123,101,897	1,741,169	N/A	213,718,532		
2012	71,289,831	2,655,238	N/A	224,568,256		
2013	35,350,709	4,510,821	N/A	225,996,766		
2014	77,523,129	225,843	N/A	247,709,038		
2015	113,200,102	4,243,405	N/A	267,211,928		
2016	111,998,183	2,617,255	N/A	285,321,630		
2017	(2,408,978)	953,353	N/A	300,500,965		
2018	90,662,584	731,761	$80,309,979	308,745,933		
A. Gross liability: (Sum of Column 7)						$
B. *De minimis*						50,000
C. Deductible: $100,000 + (B) – (A), but not greater than (B) nor less than zero						
D. Allocable Unfunded Vested Liability: (A) – (C), not less than zero and without regard to annual payment limitations						

Employers (except former Local 49 Plan employers) can estimate their withdrawal liability by entering in column 6 above the sum of their Obligated Employer Contributions to the Plan for calendar years 1998 through 2018 in the appropriate 5-year block (including all supplemental contributions payable pursuant to supplemental contribution rate increases effective on or prior to December 31, 2014 and excluding surcharges) and completing the worksheet. Former Local 49 Plan employers must use the worksheet shown in Exhibit C.

[1] Years not shown have no withdrawal liability component.

EXHIBIT C - EMPLOYER WITHDRAWAL LIABILITY WORKSHEET FOR WITHDRAWALS FROM JANUARY 1, 2019 THROUGH DECEMBER 31, 2019
(APPLICABLE TO FORMER LOCAL 49 PLAN EMPLOYERS ONLY)

Employer Name:						
	Unamortized Balance of Withdrawal Liability Pools			Contributions During 5-Year Period Ending With Date Pool Established		
Year Ended December 31[1]	Basic Pools	Reallocated Pools	Affected Benefits Pools	Total Plan Contributions	Obligated Employer Contributions	Liability Allocated: [(6) ÷ (5)] x [(2) + (3) + (4)]
(1)	(2)	(3)	(4)	(5)	(6)	(7)
2003	$1,138,740	$0	N/A	$4,979,427[2]	$	$
2004	36,538,093	60,447	N/A	162,472,680		
2005	2,851,482	116,395	N/A	173,635,603		
2006	(27,918,893)	123,751	N/A	183,095,035		
2007	26,115,512	702,301	N/A	191,086,522		
2008	62,923,528	2,376,982	N/A	198,119,385		
2009	116,845,282	597,443	N/A	203,044,985		
2010	39,488,304	3,160,149	N/A	207,848,001		
2011	123,101,897	1,741,169	N/A	213,718,532		
2012	71,289,831	2,655,238	N/A	224,568,256		
2013	35,350,709	4,510,821	N/A	225,996,766		
2014	77,523,129	225,843	N/A	247,709,038		
2015	113,200,102	4,243,405	N/A	267,211,928		
2016	111,998,183	2,617,255	N/A	285,321,630		
2017	(2,408,978)	953,353	N/A	300,500,965		
2018	90,662,584	731,761	$80,309,979	308,745,933		
A. Gross liability: (Sum of Column 7)						$
B. *De minimis*						50,000
C. Deductible: $100,000 + (B) – (A), but not greater than (B) nor less than zero						
D. Allocable Unfunded Vested Liability: (A) – (C), not less than zero and without regard to annual payment limitations						

Local 49 Employers can estimate their withdrawal liability by entering in column 6 above the sum of their Obligated Employer Contributions to the Plan for calendar years 1998 through 2018 in the appropriate 5-year block (including all supplemental contributions payable pursuant to supplemental contribution rate increases effective on or prior to December 31, 2014 and excluding surcharges) and completing the worksheet.

[1] Years not shown have no withdrawal liability component.

[2] Applicable contributions for the 2003 Merger pool are the five plan years ending April 30, 2003

EXHIBIT D - HISTORY OF UNFUNDED VESTED LIABILITIES

December 31	Total Vested Liability	Assets at Market Value	Unfunded Vested Liability	Asset/Liability Ratio
1992	$105,809,700	$129,425,100	$0	122%
1993	124,575,700	140,965,600	0	113
1994	120,077,500	141,738,300	0	118
1995	553,816,500	683,079,100	0	123
1996	600,498,200	751,449,700	0	125
1997	698,183,800	884,181,200	0	127
1998	782,066,800	982,074,000	0	126
1999	752,037,600	1,029,092,300	0	137
2000	823,123,000	1,020,908,200	0	124
2001	1,019,426,000	1,019,439,800	0	100
2002	1,155,797,700	918,522,000	237,275,700	77
2003[1]	1,228,620,038	1,021,443,703	207,176,335	83
2004	1,416,884,449	1,098,866,477	318,017,972	78
2005	1,453,990,660	1,144,867,286	309,123,374	79
2006	1,465,381,576	1,243,504,477	221,877,099	85
2007	1,553,906,252	1,287,953,866	265,952,386	83
2008	1,256,796,870	881,858,331	374,938,539	70
2009	1,504,848,871	940,617,622	564,231,249	63
2010[2]	1,578,752,159	982,482,625	596,269,534	62
2011[2]	1,673,566,453	924,975,634	748,590,819	55
2012[2]	1,781,012,816	977,115,005	803,897,811	55
2013[2]	1,878,090,338	1,078,686,004	799,404,334	57
2014[2]	1,950,278,603	1,107,954,826	842,323,777	57
2015[2]	1,989,760,607	1,073,089,905	916,670,702	54
2016[2]	2,085,882,177	1,110,257,541	975,624,636	53
2017[2]	2,139,524,392	1,238,146,139	901,378,253	58
2018[2]	2,089,360,202	1,168,903,191	920,457,011	56

[1] *Excludes liabilities and assets attributable to the merger with the SEIU Local 49 Pension Plan effective June 1, 2004.*

[2] *Excludes Affected Benefits pools.*

Calculations reflect the plan of benefits in effect on that date and do not reflect plan amendments or benefit level increases (or decreases) due to higher (or lower) negotiated contribution rates effective on or after the valuation date.

Section 4: Actuarial Certification

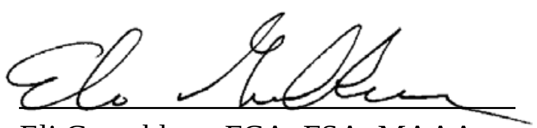
January 23, 2020

ACTUARIAL CERTIFICATION OF WITHDRAWAL LIABILITY

This is to certify that Segal Consulting, a Member of The Segal Group, Inc., has prepared an Actuarial Valuation to calculate the pools used to assess withdrawal liability to employers who withdraw during the year beginning January 1, 2019. The calculations were performed in accordance with generally accepted actuarial principles and practices. This valuation report may not otherwise be copied or reproduced in any form without the consent of the Board of Trustees and may only be provided to other parties in its entirety.

The valuation was based on information supplied by the auditor with respect to contributions and assets and by the Plan Administrator with respect to the data required on participants. We have not verified and customarily would not verify such information, but we have no reason to doubt its substantial accuracy.

I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion herein. To the best of my knowledge, the information supplied in this Actuarial Valuation is complete and accurate, except as noted in *Exhibit I*, and in my opinion the assumptions used, in the aggregate, (a) are reasonable (taking into account the experience of the Plan and reasonable expectations) and (b) represent my best estimate of anticipated experience under the Plan.



Eli Greenblum, FCA, FSA, MAAA
Senior Vice President and Actuary
Enrolled Actuary No. 17-3636

EXHIBIT 1 - CALCULATION OF UNFUNDED VESTED LIABILITY

The valuation was made with respect to the following data supplied to us by the Plan Administrator:

Pensioners as of the valuation date (including 2,502 beneficiaries)	20,849
Participants inactive with vested rights (including 1,147 participants with unknown age)	43,711
Participants active with vested rights (including 140 participants with unknown age)	25,073
Total vested participants	**89,633**

The actuarial factors as of the valuation date are as follows:

Present value of vested benefits at funding interest rate		$1,584,501,994
Present value of vested benefits at PBGC interest rates, including allowance for expenses		2,789,162,609
Market value of assets[1]		1,168,903,191
Ratio funded at PBGC interest rates[2]		0.4191
Present value of vested benefits for withdrawal liability purposes		2,089,360,202
Preliminary Unfunded vested liability (excluding Affected Benefits pools)	$920,457,011	
Unamortized balance of Affected Benefits pools	80,309,979	
Total unfunded vested liability		1,000,766,990

[1] Excluding $16,411,925 in withdrawal liability contributions receivable
[2] Shown rounded to four decimal places

EXHIBIT 2 - WITHDRAWAL LIABILITY POOLS

Pool Established December 31	Original Amount			Pool Balance on December 31, 2018[1]			
	Basic Pool	Reallocated Pool	Affected Benefits Pool	Basic Pool	Reallocated Pool	Affected Benefits Pool	Total Pools
1998-2001	$0	$0	$0	$0	$0	$0	$0
2002	237,275,672	0	0	47,455,134	0	0	47,455,134
2003[2]	(18,235,553)	0	0	(4,558,888)	0	0	(4,558,888)
2004	121,793,642	201,490	0	36,538,093	60,447	0	36,598,540
2005	8,147,090	332,556	0	2,851,482	116,395	0	2,967,877
2006	(69,797,233)	309,377	0	(27,918,893)	123,751	0	(27,795,142)
2007	58,034,470	1,560,668	0	26,115,512	702,301	0	26,817,813
2008	125,847,056	4,753,963	0	62,923,528	2,376,982	0	65,300,510
2009	212,445,967	1,086,260	0	116,845,282	597,443	0	117,442,725
2010	65,813,840	5,266,915	43,142,314	39,488,304	3,160,149	25,886,999	68,535,452
2011	189,387,534	2,678,722	18,294,397	123,101,897	1,741,169	12,139,389	136,982,455
2012	101,842,615	3,793,197	36,195,775	71,289,831	2,655,238	26,156,749	100,101,818
2013	47,134,279	6,014,428	17,607,718	35,350,709	4,510,821	13,691,986	53,553,516
2014	96,903,911	282,304	2,613,854	77,523,129	225,843	2,166,216	79,915,188
2015	133,176,591	4,992,241	306,559	113,200,102	4,243,405	268,640	117,712,147
2016	124,442,426	2,908,061	0	111,998,183	2,617,255	0	114,615,438
2017	(2,535,766)	1,003,529	0	(2,408,978)	953,353	0	(1,455,625)
2018	90,662,584	731,761	0	90,662,584	731,761	0	91,394,345

[1] *Basic and reallocated pools are written down annually at the rate of 5% of the original amount. The Affected Benefits pools are amortized over 15 years at the interest rate used for plan funding for the year for which the pool was established; the total unamortized balance of those pools is $80,309,979.*

[2] *In addition, a merger pool of $4,554,958 was established as of December 31, 2003 for the SEIU Local 49 Pension Plan, which merged into this plan effective June 1, 2003. The outstanding balance of this pool as of December 31, 2018 is $1,138,740.*

EXHIBIT 3 - SUMMARY OF PLAN PROVISIONS

This exhibit summarizes the major provisions of the Plan included in the valuation as of December 31, 2018. It is not intended to be, nor should it be interpreted as, a complete statement of all plan provisions.

Plan Year	January 1 through December 31
Pension Credit Year	January 1 through December 31
Plan Status	Ongoing plan
Normal Pension:	*Age Requirement*: 65 *Service Requirement:* 5 years Vesting Credit or 5 Pension Credits, including 3 years Future Service. *Amount for Benefit Accrual or after January 1, 2010:* 1.75% of contributions (1.0% for participants under the Default Schedule of the Rehabilitation Plan). *Amount for Benefit Accruals on or after January 1, 2008 through December 31, 2009:* 2.50% of contributions for those whose first contribution date is prior to January 1, 2008, and 2.25% of contributions for those whose first (or first after a permanent break in service) contribution date is on or after January 1, 2008. *Amount for Benefit Accruals through December 31, 2007:* Greater of a) 3.00% of contributions for hours worked through December 31, 2004, and 2.70% of contributions for hours worked on or after January 1, 2005 through December 31, 2007, made on the employee's behalf (the Contributions Formula), or b) amount based on the "Benefit Table Formula" in Section 7.04 of the Plan for pension credit earned through December 31, 2004, plus 90% of the scheduled amount for pension credit earned after December 31, 2004 through December 31, 2007. In addition, a 7.35% increase is applied to future service benefits accrued through December 31, 2003, if service is earned on or after January 1, 2001. For former participants in the Pittsburgh Building Employees' Pension Fund, the benefit amount will not be less than: a) Accrued benefit as of merger date (1/1/91) plus SEIU future accrual rate per the Benefit Table Formula for up to 25 total years of service; b) If over age 50, or more than 25 years of credited service, as of January 1, 1991: accrued benefit as of merger date plus 2% of employer contributions thereafter.

Normal Pension: *(continued)*	For former participants in the Building Service Employees Pension Plan (BSEPP), the benefit amount through December 31, 2007 is the greater of the following: a) The accrued benefit as of the merger date (5/1/94) plus 40.8% of the accrued benefit at merger, all multiplied by an index factor (as defined below), plus the SEIU future accrual rate per the "Benefit Table" formula for up to 24 total years of service following merger (90% of the scheduled accrued rate for service after December 31, 2004). The index factor is determined by dividing the Hourly Contribution rate at retirement by the BSEPP Contribution Rate as of May 1, 1994, subtracting 1.0, then multiplying the result by 72.5% and adding back 100%. The index factor cannot exceed 200% nor be less than 100%. b) 2.25% of total contributions plus the Past Service benefit before merger, increased by 40.8%, plus 3.00% of total contributions after merger through December 31, 2004, plus 2.70% of total contributions after December 31, 2004, through December 31, 2007. In addition, a 7.35% increase is applied to future service benefits accrued through December 31, 2003. For former participants in the Service Employees of Michigan Race Tracks Pension Fund (MIRT), the benefit amount is the accrued benefit as of the merger date (4/1/2000), plus the SEIU future accrual rate per the Benefit Table Formula for up to 25 years of service following merger (90% of the scheduled accrued rate for service after December 31, 2004). In addition, a 7.35% increase is applied to future service benefits accrued from January 1, 2000 through December 31, 2003. For former participants in the SEIU Local 49 Pension Plan (Local 49), the benefit amount is the accrued benefit as of the merger date (6/1/2003), plus the SEIU future accrual rate per the Benefit Table Formula for up to 25 years of service following merger (90% of the scheduled accrued rate for service after December 31, 2004). In addition, a 7.35% increase is applied to future service benefits accrued from June 1, 2003 through December 31, 2003. Past Service benefit levels may be lower than those shown above for certain employers. Pre-participation credit is assigned at employer entry based on policies set by Trustees. Current policy (effective January 1, 2008) is to grant up to 7 years for vesting status, and up to 2 years of full pension credit (at 50% of the contribution rate), multiplied by 1,800 hours (or other appropriate basis for contributions not made on an hourly basis), for new groups that constitute less than 1% of the Plan's current active participants.
Early Pension	*Age Requirement*: 55 *Service Requirement*: Vested Status *Amount for participants without a Rehabilitation Plan Schedule:* Normal Pension accrued through December 31, 2009, reduced by 6% for each year of age less than 65. If participant's age plus pension credit total at least 80 and first contribution date is before January 1, 2008, the reduction is 3% per year of age less than 62 (6% if no pension credit earned in year of retirement or prior year), plus Normal pension earned on or after January 1, 2010, actuarially reduced from age 65. *For participants covered by a Rehabilitation Plan schedule:* Normal Pension accrued, actuarially reduced from age 65.

Contributions Considered:	Contributions used for benefit calculation purposes exclude any surcharges or non-benefit bearing contribution rate increases prescribed by the Rehabilitation Plan.
Vesting	*Age Requirement*: None *Service Requirement*: (a) 5 years of Vesting Credit or (b) 5 years Pension Credit with at least 1 year (3 years if not yet a participant at 12/31/2004) of Future Service *Amount*: Same as Normal Pension; if payable before age 65, benefit is actuarially reduced. *Normal Retirement Age*: 65 or age on the fifth anniversary of participation, if later
Medicare Supplement *(for covered BSEPP participants in pay status as of December 31, 2009):*	*Age Requirement*: None *Service Requirement*: Vested status *Amount*: $54.00 per month commencing at age 65 for employees vested prior to merger or with at least 10 vesting credits earned prior to January 1, 2005. For others, benefit is multiplied by 50%, plus 5% for each 1/2 vesting Credit earned prior to January 1, 2005 in excess of 5 (but not greater than 100%).
Spouse's Pre-Retirement Death Benefit	*Age Requirement:* None *Service Requirement:* Vested Status *Amount:* 50% of the benefit employee would have received upon retirement, having elected the Husband and Wife option. The amount is payable immediately if the employee's death occurred after age 55. If employee died before age 55, the spouse's benefit is deferred to the month after the employee would have attained age 55. *Charge for Coverage:* None
Pre-Retirement Lump-sum Death Benefit	*Age Requirement:* None *Service Requirement:* Two quarters of Future Service Credit in the six consecutive calendar year period prior to the calendar year of death. *Amount:* A lump-sum payment equal to the total amount of contributions paid to the Fund on the participant's behalf, up to a maximum of $30,000. This benefit is not provided if the Spouse's Benefit is payable.
Post-Retirement Death Benefit	*Husband and Wife:* If married, pension benefits are paid in the form of a 50% joint and survivor annuity unless this form is properly rejected. If not rejected, the benefit amount otherwise payable is reduced to reflect the joint and survivor coverage. Benefits accrued prior to January 1, 2005 for participants not under the Default or Preferred Schedule are restored to the unreduced amount if the beneficiary dies before the employee. If rejected, or if not married, benefits are payable for the life of the employee (with 5 years of payment guaranteed on all benefits accrued prior to January 1, 2010) without reduction, or in any other available optional form (including the 50% joint and survivor annuity described above) elected by the employee in an actuarially equivalent amount. Benefits are payable without the guarantee described above for participants under a Rehabilitation Plan schedule.

Pension Credit

Contributions in Calendar Year for hours	Years of Credit
1,800 or more	1.00
1,600 to 1,799	0.90
1,400 to 1,599	0.80
1,200 to 1,399	0.70
1,000 to 1,199	0.60
800 – 999	0.50
600 – 799	0.40
500 – 599	0.30
400 – 499	0.25
300 – 399	0.20
200 – 299	0.15
180 – 199	0.20

Vesting Credit

One credit for 700 or more hours of Covered Employment in a Calendar Year; one-half credit for 350 or more hours. For seasonal employees, one credit for 120 or more hours of Covered Employment in a Calendar Year.

Estimated Average Hourly Contribution Rate:

	For Active Employees	
	on 1/1/2018	on 1/1/2019
Seasonal Employees	$1.4865	$1.4269
Other Employees	0.4914	0.4928

Progress of Rehabilitation Plan Schedule Adoption:

As of January 1, 2019, 20.6% of active vested participants are under the Default Schedule and 79.4% are under the Preferred Schedule.

Changes in Plan Provisions

None

EXHIBIT 4 - ACTUARIAL ASSUMPTIONS AND METHODS

Investment Return	(a) To the extent the vested benefits are matched by the market value of plan assets on hand: interest assumptions prescribed by the Pension Benefit Guaranty Corporation under 29 C.F.R. Ch. XL, Part 4044, which are in effect for the applicable withdrawal liability valuation date, are used. PBGC Interest Rates as of December 31, 2018: First 20 years 2.84% After 20 years 2.76% (b) To the extent the vested benefits are not matched by plan assets (at market), the interest assumption is the same as used for plan funding for the Plan Year beginning one day after the vested benefit liability determination date: 7.25% (c) The portion of the vested benefits that is matched by readily available assets is determined by comparing the total present value of vested benefits plus expenses – at PBGC rates – with the total market value of assets; each vested benefit is treated as covered by assets to the same extent as all other vested benefits. (d) Affected Benefits liabilities are valued at the same interest rate assumption used for plan funding for the Plan year for which the pool is established. The discount rate is based on a blend, which includes rates selected based on estimated annuity purchase rates for benefits being settled, because withdrawal liability is a final settlement of an employer's obligations to the Plan. For benefits that could be settled immediately, because assets on hand are sufficient, the annuity purchase rates are those promulgated by PBGC under ERISA Sec. 4044 for multiemployer plans terminating by mass withdrawal on the measurement date. For benefits that cannot be settled immediately because they are not currently funded, the calculation uses rates equal to the discount rate used for plan funding calculations.
Administrative Express:	$10,000, plus $200 per vested participant, plus a percentage (defined by statute) of the excess of the value of plan benefits over $200,000, and is applicable to the portion of benefits that is matched by assets.
Valuation of Assets:	At market value, excluding withdrawal liability contributions receivable. Assets held by insurance companies in general accounts are included at liquidation value if known; otherwise they are included at estimated fair value.
All other Assumptions:	The same as used for minimum funding purposes as of the valuation date that is the day following the date for determination of unfunded vested liability, as described in the January 1, 2019 actuarial valuation report.
Allocation method:	Presumptive
Contribution period for prorating liabilities:	5 years
***De minimis* Deductible**	$50,000, or 3/4 of 1% of the unfunded vested liability, if smaller. The deductible is reduced, dollar for dollar, if the gross assessment is in excess of $100,000.

Free Look	An employer that withdraws after having been in the plan for no more than 5 plan years has no withdrawal liability, provided the employer was at all times responsible for less than 2% of contributions made to the plan for each year that it participated and, for the plan year preceding the year the employer joined the plan, the plan's assets were at least 8 times its benefit payments.

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