

SEIU National Industry Pension Fund

**Actuarial Certification of Plan Status Under IRC Section 432 as
of January 1, 2025**



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1800 M Street NW, Suite 900 S
Washington, DC 20036-5880
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T:202.833.6400

March 31, 2025

Board of Trustees
SEIU National Industry Pension Fund
1800 Massachusetts Ave NW, Suite 301
Washington, DC 20036

Dear Trustees:

As required by ERISA Section 305 and Internal Revenue Code (IRC) Section 432, we have completed the Plan's actuarial status certification as of January 1, 2025 in accordance with the Multiemployer Pension Reform Act of 2014 (MPRA). This certification has been prepared for the exclusive use and benefit of the Board, based upon information provided by the Fund Office and the Fund's other service providers. Segal makes no representation or warranty as to the future status of the Plan and does not guarantee any particular result. The attached exhibits outline the projections performed and the results of the various tests required by the statute. These projections have been prepared based on the Actuarial Valuation as of January 1, 2024 and in accordance with generally accepted actuarial principles and practices and a current understanding of the law. The actuarial calculations were completed under the supervision of Maria Kirilenko, ASA, FCA, MAAA, EA, Vice President and Actuary.

As of January 1, 2025, **the Plan is in critical status** but not critical and declining status.

This certification also notifies the IRS that the Plan is making the scheduled progress in meeting the requirements of its Rehabilitation Plan, based on information received from the Plan sponsor.

We look forward to reviewing this certification with you at your next meeting and to answering any questions you may have. We are available to assist the Trustees in communicating this information to Plan stakeholders as well as in reviewing the Rehabilitation Plan later this year.

Board of Trustees
March 31, 2025

Sincerely,

Segal



Stacey Hostetler Carter
Senior Vice President and Benefits Consultant



Alex Giordano, ASA, FCA, MAAA, EA
Vice President and Consulting Actuary

cc: Eunice Washington, Esq.
Michael Shelton
Jennifer Cromwell, Esq.
Ramya Ravindran, Esq.
Jason Mettley, Esq.
Michael Warshaw, CPA

Actuarial Status Certification as of January 1, 2025: Key Results

Item	Description	2025
Certified zone status		Critical
Scheduled progress		Making Scheduled Progress toward Rehabilitation Plan
Assets	Actuarial value of assets (AVA)	\$1,691,064,504
Funded percentage	Unit credit accrued liability	1,842,900,839
	Funded percentage	91.7%
Funding Standard Account	Funding credit balance as of the end of the prior year	(\$10,357,383)
Investment return	Assumed rate of return	7.00%
Solvency projection	Years to projected insolvency	Never



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March 31, 2025

Department of the Treasury
Internal Revenue Service
Employee Plans
CHI-7602 - 25th Floor
230 S. Dearborn Street
Chicago, IL 60604

To Whom It May Concern:

As required by ERISA Section 305 and the Internal Revenue Code (IRC) Section 432, we have completed the actuarial status certification as of January 1, 2025, for the following plan:

Name of Plan: SEIU National Industry Pension Fund
Plan number: EIN 52-6148540 / PN 001
Plan sponsor: Board of Trustees, SEIU National Industry Pension Fund
Address: 1800 Massachusetts Ave NW, Suite 301, Washington, DC 20036
Phone number: 202.730.7542

As of January 1, 2025, the Plan is in critical status but not declining status.

This certification reflects elections made by the Trustees under the American Rescue Plan Act of 2021 (ARPA), enacted on March 11, 2021. The Trustees made an election under ARPA to extend the Rehabilitation Period by five years.


This certification also notifies the IRS that the Plan is making the scheduled progress in meeting the requirements of its Rehabilitation Plan, based on the annual standards in the Rehabilitation Plan.

Internal Revenue Service
March 31, 2025

If you have any questions on the attached certification, you may contact me at the following:

Segal
1800 M Street NW, Suite 900 S
Washington, DC 20036-5880
Phone number: 202.833.6400

Sincerely,


Maria Kirilenko, ASA, FCA, MAAA, EA
Vice President and Actuary
Enrolled Actuary No. 23-8331

Actuarial Status Certification as of January 1, 2025 Under IRC Section 432
March 31, 2025

Illustration Supporting Actuarial Certification of Status (Schedule MB, line 4b)

This is to certify that Segal has prepared an actuarial status certification under Internal Revenue Code Section 432 for the SEIU National Industry Pension Fund as of January 1, 2025, in accordance with generally accepted actuarial principles and practices. It has been prepared at the request of the Board of Trustees to assist in administering the Fund and meeting filing and compliance requirements under federal law. This certification 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 actuarial certification may not be applicable for other purposes. Future actuarial measurements may differ significantly from the current measurements presented in this report due to such factors as the following: plan experience differing from that anticipated by the economic or demographic assumptions; changes in economic or demographic assumptions; increases or decreases expected as part of the natural operation of the methodology used for these measurements (such as the end of an amortization period or additional cost or contribution requirements based on the plan's funded status); differences in statutory interpretation and changes in plan provisions or applicable law.

This certification is based on the January 1, 2024, actuarial valuation, dated March 31, 2025. This certification reflects the changes in the law made by the Multiemployer Pension Reform Act of 2014 (MPRA). Additional assumptions required for the projections (including those under MPRA and ARPA), and sources of financial information used are summarized in Exhibit 6.

Segal does not practice law and, therefore, cannot and does not provide legal advice. Any statutory interpretation on which this certification is based reflects Segal's understanding as an actuarial firm.

This certification was based on the assumption that the Plan was qualified as a multiemployer plan for the year.

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 certification is complete and accurate. In my opinion, the projections are based on reasonable actuarial estimates, assumptions and methods that offer my best estimate of anticipated experience under the Plan. In addition, as allowed by IRC Section 432(b)(3)(B), in my opinion, the contributions used for insolvency projections are reasonable. Furthermore, as required by IRC Section 432(b)(3)(B)(iii), the projected industry activity is reasonable, taking into account information provided by the Plan sponsor. In my opinion, the combined effect of these assumptions is expected to have no significant bias.



Maria Kirilenko, ASA, FCA, MAAA, EA

EA# 23-8331

Title Vice President and Actuary

Email mkirilenko@segalco.com

Certificate Contents

Exhibit Number	Certification Contents
1	Status Determination as of January 1, 2025
2	Summary of Actuarial Valuation Projections
3	Funding Standard Account Projections
4	Funding Standard Account — Projected Bases Assumed Established After January 1, 2024
5	Solvency Projection
6	Actuarial Assumptions and Methodology

Actuarial Status Certification Under IRC Section 432

Exhibit 1: Status Determination as of January 1, 2025

Status/Condition	Component Result	Final Result
Critical status:		
1. Initial critical status tests:		
C1. A funding deficiency is projected in four years?	Yes	Yes
C2. a. A funding deficiency is projected in five years,	Yes	
b. and the present value of vested benefits for non-actives is more than present value of vested benefits for actives,	Yes	
c. and the normal cost-plus interest on unfunded actuarial accrued liability (unit credit basis) is greater than contributions for current year?	No	No
C3. a. A funding deficiency is projected in five years,	Yes	
b. and the funded percentage is less than 65%?	No	No
C4. a. The funded percentage is less than 65%,	No	
b. and the present value of assets plus contributions is less than the present value of benefit payments and administrative expenses over seven years	No	No
C5. The present value of assets plus contributions is less than the present value of benefit payments and administrative expenses over five years?	No	No
2. Emergence test:		
C6. a. Was in critical status for the immediately preceding plan year,	Yes	
b. and either a funding deficiency is projected for the plan year or any of the next nine plan years, without regard to the use of the shortfall method but taking into account any extension of amortization periods under ERISA Section 304(d)(2) or ERISA Section 304 as in effect prior to PPA'06,	Yes	
c. or insolvency is projected for the current year or any of the 30 succeeding plan years?	No	

Status/Condition	Component Result	Final Result
Plan did not emerge?		Yes
3. In critical status? (If C1-C5 or C6 is Yes, then Yes)		Yes
4. Determination of critical and declining status:		
C7. a. Any of (C1) through (C5) are Yes?	Yes	
b. and either insolvency is projected within 15 years?	No	No
c. or		
1) The ratio of inactives to actives is at least 2 to 1,	No	
2) and insolvency is projected within 20 years?	No	No
d. or		
1) The funded percentage is less than 80%,	No	
2) and insolvency is projected within 20 years?	No	No
In critical and declining status?		No

This certification also notifies the IRS that the Plan is making the scheduled progress in meeting the requirements of its Rehabilitation Plan, based on the annual standards of the Rehabilitation Plan. The projected December 31, 2025, funding deficiency is \$4.3 million compared to the annual standard of a \$100.0 million funding deficiency as of that date in the Rehabilitation Plan.

Exhibit 2: Summary of Actuarial Valuation Projections

The actuarial factors as of January 1, 2025 (based on projections from the January 1, 2024 valuation certificate):

Description	Value
1. Financial information:	
a. Market value of assets	\$1,696,854,531
b. Actuarial value of assets	1,691,064,504
c. Reasonably anticipated contributions (including withdrawal liability payments from previously withdrawn employers)	
1) Upcoming year	91,274,855
2) Present value for the next five years	409,411,386
3) Present value for the next seven years	545,699,775
d. Projected benefit payments	136,718,707
e. Projected administrative expenses (beginning of year)	13,402,348
2. Liabilities:	
a. Present value of vested benefits for active participants	\$348,473,597
b. Present value of vested benefits for non-active participants	1,478,045,225
c. Total unit credit accrued liability	1,842,900,839
d. Present value of payments in the next five years:	
1) Benefit payments	587,339,509
2) Administrative expenses	62,185,340
3) Total	649,524,849
e. Present value of payments in the next seven years:	
1) Benefit payments	785,235,682
2) Administrative expenses	83,926,547
3) Total	869,162,229
f. Unit credit normal cost plus expenses	34,828,878
g. Ratio of inactive participants to active participants	1.8088

Description	Value
3. Funded percentage (1.b)/(2.c)	91.7%
4. Funding Standard Account:	
a. Credit balance as of the end of prior year	(\$10,357,383)
b. Years to projected funding deficiency	0
c. Projected year of emergence	2027
d. Years to projected insolvency	N/A

Exhibit 3: Funding Standard Account Projections

The table below presents the **Funding Standard Account** projections for the plan years beginning January 1.

Description	2024	2025	2026	2027	2028	2029
1. Credit balance (BOY)	(\$37,722,489)	(\$10,357,383)	(\$4,254,854)	(\$704,340)	\$26,518,401	\$62,644,897
2. Interest on (1)	(2,640,574)	(725,017)	(297,840)	(49,304)	1,856,288	4,385,143
3. Normal cost	11,875,466	11,999,743	12,177,651	12,310,534	14,072,935	15,009,981
4. Administrative expenses	12,438,149	13,402,348	13,804,418	14,218,551	14,645,108	15,084,461
5. Net amortization charges	43,984,627	57,237,182	59,606,415	42,349,039	36,867,279	25,520,805
6. Interest on (3), (4) and (5)	4,780,877	5,784,749	5,991,194	4,821,469	4,590,973	3,893,067
7. Expected contributions	99,880,306	92,290,578	92,461,557	97,832,834	101,199,680	101,834,456
8. Interest on (7)	3,204,493	2,960,990	2,966,475	3,138,804	3,246,823	3,267,189
9. Credit balance (EOY): (1) + (2) – (3) – (4) – (5) – (6) + (7) + (8)	(\$10,357,383)	(\$4,254,854)	(\$704,340)	\$26,518,401	\$62,644,897	\$112,623,371

Description	2030	2031	2032	2033	2034
1. Credit balance (BOY)	\$112,623,371	\$181,333,176	\$254,810,755	\$337,931,844	\$427,496,317
2. Interest on (1)	7,883,636	12,693,322	17,836,753	23,655,229	29,924,742
3. Normal cost	15,115,261	15,199,695	15,263,519	15,303,998	15,350,231
4. Administrative expenses	15,536,995	16,003,105	16,483,198	16,977,694	17,487,025
5. Net amortization charges	11,309,351	10,796,517	5,876,449	4,592,376	341,635
6. Interest on (3), (4) and (5)	2,937,312	2,939,952	2,633,622	2,581,185	2,322,522
7. Expected contributions	102,438,519	102,437,006	102,260,274	102,089,137	102,089,137
8. Interest on (7)	3,286,569	3,286,520	3,280,850	3,275,360	3,275,360
9. Credit balance (EOY): (1) + (2) – (3) – (4) – (5) – (6) + (7) + (8)	\$181,333,176	\$254,810,755	\$337,931,844	\$427,496,317	\$527,284,143

Note: Numbers may not add up due to rounding.

Exhibit 4: Funding Standard Account — Projected Bases Assumed Established after January 1, 2024
Schedule of Funding Standard Account Bases

Type of Base	Date Established	Base Established	Amortization Period	Amortization Payment
Experience Loss	1/1/2025	\$10,849,227	15	\$1,113,259
Experience Loss	1/1/2026	42,326,869	15	4,343,236
Experience Gain	1/1/2027	(32,915,241)	15	(3,377,492)
Experience Gain	1/1/2028	(17,536,474)	15	(1,799,449)
Experience Gain	1/1/2029	(1,331,980)	15	(136,677)
Experience Gain	1/1/2030	(1,259,725)	15	(129,263)
Experience Gain	1/1/2031	(419,644)	15	(43,060)
Experience Gain	1/1/2032	(89,438)	15	(9,177)
Experience Gain	1/1/2033	(41,432)	15	(4,251)
Experience Gain	1/1/2034	(12,651)	15	(1,298)

Exhibit 5: Solvency Projections

The table below presents the projected **market value of assets** for the plan years beginning **January 1, 2024** through **2055**.

Description	2024	2025	2026	2027	2028	2029	2030	2031
1. Market Value at beginning of year	\$1,550,383,150	\$1,696,854,531	\$1,754,642,780	\$1,812,556,478	\$1,886,316,340	\$1,963,530,251	\$2,043,203,137	\$2,124,202,801
2. Contributions	97,199,465	91,274,855	91,445,834	96,867,111	100,318,845	100,992,833	101,701,770	102,465,584
3. Withdrawal liability payments	2,680,841	1,015,723	1,015,723	965,723	895,723	872,609	767,797	764,740
4. Benefit payments	117,487,549	136,718,707	140,250,761	133,803,498	138,373,188	141,405,847	145,635,108	150,339,532
5. Administrative expenses	12,726,101	13,900,000	14,317,000	14,746,510	15,188,905	15,644,572	16,113,909	16,597,326
6. Interest earnings	176,804,725	116,116,378	120,019,902	124,477,036	129,561,436	134,857,863	140,279,114	145,779,802
7. Market Value at end of year: (1)+(2)+(3)-(4)-(5)+(6)	\$1,696,854,531	\$1,754,642,780	\$1,812,556,478	\$1,886,316,340	\$1,963,530,251	\$2,043,203,137	\$2,124,202,801	\$2,206,276,069
8. Available resources: (1)+(2)+(3)-(5)+(6)	\$1,814,342,080	\$1,891,361,487	\$1,952,807,239	\$2,020,119,838	\$2,101,903,439	\$2,184,608,984	\$2,269,837,909	\$2,356,615,601

Description	2032	2033	2034	2035	2036	2037	2038	2039
1. Market Value at beginning of year	\$2,206,276,069	\$2,290,293,559	\$2,376,147,556	\$2,465,161,826	\$2,557,852,636	\$2,655,784,139	\$2,759,050,252	\$2,868,984,716
2. Contributions	103,288,593	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386
3. Withdrawal liability payments	588,008	416,871	416,871	416,871	416,871	410,661	383,867	370,867
4. Benefit payments	154,149,297	157,368,082	159,588,417	161,508,731	162,153,764	163,038,871	162,961,061	162,825,167
5. Administrative expenses	17,095,246	17,608,103	18,136,346	18,680,436	19,240,849	19,818,074	20,412,616	21,024,994
6. Interest earnings	151,385,432	157,122,925	163,031,776	169,172,720	175,618,859	182,422,011	189,633,888	197,314,629
7. Market Value at end of year: (1)+(2)+(3)-(4)-(5)+(6)	\$2,290,293,559	\$2,376,147,556	\$2,465,161,826	\$2,557,852,636	\$2,655,784,139	\$2,759,050,252	\$2,868,984,716	\$2,986,110,437
8. Available resources: (1)+(2)+(3)-(5)+(6)	\$2,444,442,856	\$2,533,515,638	\$2,624,750,243	\$2,719,361,367	\$2,817,937,903	\$2,922,089,123	\$3,031,945,777	\$3,148,935,604

Exhibit 5: Solvency Projections (continued)

Description	2040	2041	2042	2043	2044	2045	2046	2047
1. Market Value at beginning of year	\$2,986,110,437	\$3,110,776,401	\$3,244,464,996	\$3,388,386,889	\$3,543,066,027	\$3,709,460,496	\$3,889,294,027	\$4,083,567,678
2. Contributions	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386
3. Withdrawal liability payments	348,071	305,315	226,910	112,239	0	0	0	0
4. Benefit payments	162,810,032	161,836,541	160,250,300	158,793,399	157,120,775	154,667,944	152,135,189	149,371,400
5. Administrative expenses	21,655,744	22,305,416	22,974,578	23,663,815	24,373,729	25,104,941	25,858,089	26,633,832
6. Interest earnings	205,493,283	214,234,851	223,629,475	233,733,727	244,598,587	256,316,030	268,976,543	282,655,908
7. Market Value at end of year: (1)+(2)+(3)-(4)-(5)+(6)	\$3,110,776,401	\$3,244,464,996	\$3,388,386,889	\$3,543,066,027	\$3,709,460,496	\$3,889,294,027	\$4,083,567,678	\$4,293,508,740
8. Available resources: (1)+(2)+(3)-(5)+(6)	\$3,273,586,433	\$3,406,301,537	\$3,548,637,189	\$3,701,859,426	\$3,866,581,271	\$4,043,961,971	\$4,235,702,867	\$4,442,880,140

Description	2048	2049	2050	2051	2052	2053	2054	2055
1. Market Value at beginning of year	\$4,293,508,740	\$4,520,078,244	\$4,764,938,168	\$5,029,115,468	\$5,314,144,051	\$5,621,396,667	\$5,952,916,067	\$6,310,258,702
2. Contributions	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386	103,290,386
3. Withdrawal liability payments	0	0	0	0	0	0	0	0
4. Benefit payments	146,715,209	143,555,397	140,615,161	137,474,594	134,391,658	130,812,630	127,343,008	123,948,217
5. Administrative expenses	27,432,847	28,255,832	29,103,507	29,976,612	30,875,910	31,802,187	32,756,253	33,738,941
6. Interest earnings	297,427,174	313,380,767	330,605,582	349,189,403	369,229,798	390,843,831	414,151,510	439,263,071
7. Market Value at end of year: (1)+(2)+(3)-(4)-(5)+(6)	\$4,520,078,244	\$4,764,938,168	\$5,029,115,468	\$5,314,144,051	\$5,621,396,667	\$5,952,916,067	\$6,310,258,702	\$6,695,125,001
8. Available resources: (1)+(2)+(3)-(5)+(6)	\$4,666,793,453	\$4,908,493,565	\$5,169,730,629	\$5,451,618,645	\$5,755,788,325	\$6,083,728,697	\$6,437,601,710	\$6,819,073,218

Exhibit 6: Actuarial Assumptions and Methodology

The actuarial assumptions and plan of benefits are as used in the January 1, 2024 actuarial valuation certificate, dated March 31, 2025, except as specifically described below. We also assumed that experience would emerge as projected, except as described below. The calculations are based on a current understanding of the requirements of ERISA Section 305 and IRC Section 432.

Contribution rates

The average benefit-bearing contribution rate for 2025 and beyond are projected to increase due to the ongoing USWW negotiations from 48.86¢ per hour in 2024 as follows:

As of January 1	Benefit-Bearing Contribution Rate
2025	\$0.4892
2026	\$0.4905
2027	\$0.4906
2028	\$0.5480
2029 & thereafter	\$0.5809

For participants who are not part of groups who entered the Plan as part of USWW negotiations in late 2021 and throughout 2022 and 2023, the average total contribution rate for 2025 (and beyond) is projected to be \$1.2762 per hour. This change is an estimate of formal commitments already adopted by the collective bargaining parties in compliance with the Rehabilitation Plan.

For participants who newly entered the Plan via USWW negotiations prior to January 1, 2024, supplemental contribution rate increases of 7.75% required under the addendum to Rehabilitation Plan are assumed to occur annually beginning on the January 1 following the contract negotiation date. For both Funding Standard Account (FSA) and solvency projections, these participants are assumed to have three negotiated increases remaining under the Rehabilitation Plan schedule. For these groups, the average contribution rates for 2025 and thereafter are as follows:

As of January 1	Benefit-Bearing Hourly Rate	Total Hourly Rate For FSA	Total Hourly Rate For Solvency
2025	\$0.2210	\$0.2210	\$0.2210
2026	\$0.2210	\$0.2381	\$0.2381
2027	\$0.2210	\$0.2566	\$0.2566
2028 and thereafter	\$0.2210	\$0.2765	\$0.2765

Lastly, additional contributions were also reflected for groups that negotiated entry into the Plan after January 1, 2024 and that are subject to the same supplemental contribution rate increases, and for groups that negotiated benefit-bearing contribution rate increases. These contributions are estimated to be as follows:

	Annual Contributions For FSA	Annual Contributions For Solvency
2025	\$165,854	\$165,854
2026	178,917	178,917
2027	5,434,383	5,434,383
2028	8,681,732	8,696,620
2029	9,339,622	9,370,608
2030	10,048,497	10,079,545
2031	10,050,041	10,843,359
2032	10,050,041	11,666,368
2033 and thereafter	10,050,041	11,668,161

Asset information

The financial information as of January 1, 2025 was based on an unaudited financial statement provided by the Fund Office. The income and expense items were based on information about contributions, withdrawal liability payments, benefits and expense payments provided by the Fund Administrator.

For projections after that date, the assumed administrative expenses were set to \$13.9 million for 2025 and increased by 3.00% per year thereafter, based on recent experience and future inflation expectations.

The benefit payments were projected based on the January 1, 2024 actuarial valuation data and assumptions, using an open group projection methodology.

The projected net investment return was assumed to be 7.00% of the average market value of assets for the 2025 and subsequent Plan Years. Any resulting investment gains or losses due to the operation of the asset valuation method are amortized over 15 years in the Funding Standard Account.

Projected industry activity

The projected industry activity assumption takes into account information provided by the Plan sponsor as required by Internal Revenue Code Section 432, historical and current contribution levels, projections in employment levels, and professional judgment. Based on this information, the number of active participants is assumed to increase from the January 1, 2024 level of 40,491 by approximately 660 participants (in addition to contribution rate increases for approximately 14,000 participants) in USWW bargaining units that have already negotiated entry into the Plan. On the average, contributions will be made for each active for 1,950 hours each year.

In addition to projections of industry activity directly linked to the level of ongoing employment, these determinations also include reasonable projections of contribution amounts derived from withdrawal liability assessments, as provided by the Fund Office.

Future normal costs

Based on the assumed industry activity, we have determined the normal cost based on an open group forecast with the number of active participants assumed to remain level. Normal cost was further increased by 0.1% in 2025, 0.3% in 2026, 13.5% in 2028, and 6.0% in 2029 to reflect the gradual entry of USWW bargained participants into the plan (based on industry activity guidance) and negotiated increases in benefit bearing contribution rates for other groups.

New entrants are assumed to have the same characteristics as new hires in the last 4 years.

Segal valuation results are based on proprietary actuarial modeling software. The actuarial valuation models generate a comprehensive set of liability and cost calculations that are presented to meet regulatory, legislative and client requirements. Deterministic cost projections are based on a proprietary forecasting model. Our Actuarial Technology and Systems unit, comprised of both actuaries and programmers, is responsible for the initial development and maintenance of these models. The models have a modular structure that allows for a high degree of accuracy, flexibility and user control. The client team programs the assumptions and the plan provisions, validates the models, and reviews test lives and results, under the supervision of the responsible actuary.

Technical issues

This document does not constitute legal, tax, accounting or investment advice or create or imply a fiduciary relationship.

Any statutory interpretation on which the certification is based reflects Segal's understanding as an actuarial firm. Due to the complexity of the statute and the significance of its ramifications, Segal recommends that the Board of Trustees consult with legal counsel when making any decisions regarding compliance with ERISA and the Internal Revenue Code.