

Minnesota Volunteer Fire Relief Association
Working Group Meeting

Office of the State Auditor
Thursday, October 14, 2010
11 a.m. to 1 p.m.

- I. Call to Order**
Chair Auditor Otto.
- II. Introductions**
- III. Review and Approval of Working Group Meeting Minutes**
Exhibit A. Draft January 12, 2010 Meeting Minutes
- IV. Working Group Process Discussion**
Exhibits B through E.
- Working Group Meeting Schedule
 - Working Group Purpose Statement
 - Working Group Process
 - Working Group Membership List
- V. Review of Draft Record Retention Schedule**
Exhibit F.
- VI. Discussion of Working Group Topic Suggestions**
Exhibit G.
- VII. Other Business**
- VIII. Next Meeting**
Tuesday, November 9, 2010
11 a.m. to 1 p.m.
Office of the State Auditor
- IX. Adjournment**

Volunteer Fire Relief Association Working Group

Office of the State Auditor

Tuesday, January 12, 2010

11 a.m. to 1 p.m.

Members Present

Wayne Anderson, Coon Rapids Fire Department Inspector (defined contribution plans)

Bruce Duncan, Excelsior Fire Relief Association President (defined benefit lump sum plans)

Dave Ganfield, Apple Valley Fire Relief Association Administrator (defined benefit monthly/lump sum combination plans)

Jim Hansen, Minnesota Area Relief Association Coalition Representative

Dave Jaeger, Mahnomon Fire Relief Association Treasurer (defined benefit lump sum plans)

Larry Martin, Legislative Commission on Pensions and Retirement Director

Rebecca Otto, State Auditor

Bruce Roed, Mentor Fire Relief Association Trustee (defined contribution plans)

Steven Wallner, Watertown City Finance Director

Nyle Zikmund, Minnesota State Fire Chiefs Association Representative (defined benefit monthly plans)

Members Excused

Tim Simon, Elk River City Finance Director

Others Present

Colleen Bollom, Minnesota Firefighter Pension Consultants Representative

Steve Cook, City of Hutchinson Mayor

Aaron Dahl, Pension Analyst

Paul Enga, Dayton Fire Relief Association Secretary

Anne Finn, League of Minnesota Cities Representative

Celeste Grant, Deputy State Auditor/General Counsel

Rose Hennessy Allen, Pension Director

Lucas Hinz, Pension Analyst

Michael Johnson, Pension Analyst

Karsten Nelson, West Metro Fire Relief Association President

The following motions were duly made, seconded and approved:

RESOLVED to approve the December 8, 2009, Working Group Meeting Minutes;

RESOLVED to adopt the survivor benefit optional changes (options one through seven) from Exhibit B, with options four and six to be modified as the Group discussed;

RESOLVED to adopt the draft language that authorizes rollovers to Minnesota deferred compensation accounts;

RESOLVED to adopt the amended draft language for the Working Group technical changes, with an effective date of the day following final enactment; and

RESOLVED to adopt the amended draft language for the Working Group substantive changes, with an effective date of the day following final enactment.

I. Call to Order

Chair Auditor Otto called the meeting to order.

II. Review and Approval of Working Group Meeting Minutes

The members reviewed the December 8, 2009, meeting minutes that had been provided in advance. Ganfield made a motion to adopt the meeting minutes. Wallner seconded the motion that was adopted unanimously.

III. Survivor Benefits

Auditor Otto explained that the draft language provided to the Group was updated based on the discussion from the last meeting. The Group discussed the seven optional changes presented in Exhibit B. Martin recommended changing an “and” to an “or” in the authorized special fund disbursements section to clarify that a survivor benefit or a death benefit can be paid, but not both. Martin also suggested revising the language in the third optional change, which would allow monthly plans to limit the duration of survivor benefit payments, to make the language more specific and to clarify that the limitation could occur in cases where the benefit is payable to a designated beneficiary. The Group agreed to the change in concept and asked Martin, Grant, and Hennessy Allen to revise the language. Mayor Cook asked if relief associations would have the ability to define the term “surviving spouse” in their bylaws if the statutory definition is removed. Martin replied that relief associations would have the ability to define the term. Martin also suggested that the language in the fifth optional change could be clarified by specifying that the survivor benefit could be paid directly to a trust if the deceased firefighter and the deceased firefighter’s spouse became deceased as a result of the same occurrence.

Zikmund made a motion to adopt optional changes three, four, and five from Exhibit B. Anderson made a motion to also adopt optional changes six and seven from the exhibit. Roed made a motion to adopt optional changes one and two. Wallner seconded the motion to adopt optional changes one through seven from the exhibit with changes four and six to be modified as the Group had discussed. The motion was adopted unanimously.

IV. Transfers to the MSRS Deferred Compensation Plan

At the last meeting the Group heard about the Minnesota Deferred Compensation Plan. Volunteer firefighters have the ability to establish deferred compensation accounts with the Minnesota State Retirement System (MSRS). Rolling over relief association service pensions to deferred compensation accounts was considered an alternative to pursuing statutory changes to allow rollovers to 401(k) retirement plans. MSRS already has authority to accept rollovers from volunteer fire relief associations, but Martin explained that he didn’t find explicit authority for relief associations to disburse the funds to MSRS. Martin also explained that the list of authorized special fund disbursements doesn’t include transfers to Individual Retirement Accounts (IRAs). Martin drafted language that would specifically authorize transfers to MSRS deferred compensation accounts and clarify that transfers to IRAs are authorized special fund disbursements. Zikmund made a

motion to adopt the draft language. Jaeger seconded the motion that was adopted unanimously.

V. Review of Working Group Draft Legislation

- **Technical Changes**

Draft legislation provided in Exhibit G was reviewed that contains the technical changes previously adopted by the Working Group. Martin suggested changing “governed by” in Section 5 to “mandated by.” Grant and Hennessy Allen also suggested changing “the provisions of” in Section 5 to “the requirements of.” The Group agreed to both suggested changes. Anderson made a motion to adopt the amended draft language, with an effective date of the day following final enactment. Jaeger seconded the motion that was adopted unanimously.

- **Substantive Changes**

The Group reviewed the draft legislation provided in Exhibit H that contains the substantive changes previously adopted. Ganfield made a motion to strike paragraph (2) from clause (b), but after discussion the suggested change was not pursued. Roed made a motion to modify paragraph (2) so that the exemption may be made if allowed by the relief association bylaws. Duncan seconded the motion that was adopted unanimously. Martin mentioned that the citations would be re-ordered when the bill is compiled. He also suggested moving paragraph (g) to be included in paragraph (b), and explained that the stricken language in paragraph (h) will need to be restored since some monthly plans may not authorize the continuation of monthly pension payments in their bylaws. The Group also agreed on an effective date of the day following final enactment. Anderson made a motion to adopt the amended draft language. Roed seconded the motion that was adopted unanimously.

VI. Other Business

Finn provided the Group with an update on the deficit amortization payment issue that was discussed during previous meetings. Finn said that the League of Minnesota Cities has decided to draft legislation that would allow an actuarial update to be used to determine municipal contribution requirements. This would allow for the calculations to be reflective of any investment gains realized after the initial actuarial valuation was performed.

Auditor Otto thanked each of the Working Group members for their participation and encouraged the members to submit topic suggestions for the next Group’s consideration. Auditor Otto said that she will reconvene the Working Group again in the summer or early fall, and will be seeking some new members to the Group to ensure that others have a chance to provide input and represent their communities. Auditor Otto assured the Group that she would keep them updated on the bill’s progress, and said that the Record Retention sub-group would begin its work in the next few weeks.

VII. Adjournment

The meeting was adjourned shortly after 1:00.

Exhibit B
Working Group Meeting Schedule

Thursday, October 14, 2010

Tuesday, November 16, 2010

Tuesday, December 7, 2010

Additional Meetings to be Scheduled as Needed.

State Auditor Rebecca Otto, Chair
Office of the State Auditor Conference Room
11:00 a.m. to 1:00 p.m.

Exhibit C
Working Group Purpose Statement

To identify and work through current and pressing relief association issues. We will do this by bringing together the major volunteer fire relief association stakeholders to develop relationships, facilitate communication, discuss relief association issues and make the Pension Process easier and more effective. The ultimate goal is to help volunteer fire relief association plans be successful.

Exhibit D

Working Group Process

- Identify and discuss topics and make recommendations to clarify state laws,*
- Forward suggested statutory changes to the Legislative Commission on Pensions and Retirement, and
- Identify ways to simplify reporting forms, identify training needs and other issues.

*Unanimous consent is required for all proposals to move forward, although proposals that receive only one dissenting vote may be revisited and reconsidered.

Exhibit E
Working Group Membership List
2010/2011

- 1. City Finance Manager**
Tim Simon, Finance Director
City of Elk River
13065 Orono Parkway
Elk River, MN 55330
Phone: (763) 635-1000
Fax: (763) 635-1090
tsimon@ci.elk-river.mn.us
- 2. Defined Contribution Plans**
Wayne Anderson, Inspector
Coon Rapids Fire Department
11155 Robinson Drive
Coon Rapids, MN 55433-3761
Phone: (763) 442-0587
wanderson@coonrapidsmn.gov
- 3. Defined Benefit Lump Sum Plans**
Bruce Duncan, President
Excelsior Fire Relief Association
24100 Smithtown Road
Shorewood, MN 55331
Phone: (651) 297-3975
Fax: (952) 960-1690
bruce.duncan@state.mn.us
- 4. Legislative Commission on Pensions & Retirement**
Lawrence A. Martin, Director
Edward Burek, Deputy Director
55 State Office Building
Saint Paul, MN 55155
Phone: (651) 296-2750
Fax: (651) 297-3697
lisa.dieslin@lcpr.leg.mn

- 5. Minnesota Area Relief Association Coalition**
Jim Hansen, Vice President of Legislative Advocacy
Spring Lake Park Fire Relief Association
1710 County Highway 10 NE
Spring Lake Park, MN 55432
Phone: (763) 786-4436
jhansen@sbmfire.com
- 6. Minnesota State Fire Chiefs Association/Monthly Plans**
Nyle Zikmund, Chief
Spring Lake Park, Blaine & Mounds View Fire Department
1710 County Highway 10 NE
Spring Lake Park, MN 55432
Phone: (763) 786-4436
nzikmund@sbmfire.com
- 7. Defined Benefit Monthly/Lump Sum Combination Plans**
Dave Ganfield, Administrator
Apple Valley Fire Relief Association
7100 – 147th Street West
Apple Valley, MN 55124
Phone: (612) 598-6369
dganfield@hotmail.com
- 8. Minnesota State Fire Department Association**
John King, Secretary
Le Sueur Fire Relief Association
203 South 2nd Street
Le Sueur, MN 56058
(612) 756-4590
john.king@state.mn.us
vetventures@mchsi.com
- 9. City Finance Manager**
Steven Wallner, Finance Director
City of Watertown
PO Box 279

Watertown, MN 55388
Phone: (952) 955-2681
Fax: (952) 955-2695
swallner@ci.watertown.mn.us

10. Defined Benefit Lump Sum Plans

Dave Jaeger, Treasurer
Mahnomen Fire Relief Association
116 SW Roosevelt Street
Mahnomen, MN 56557
Phone: (218) 935-5668
Fax: (218) 935-2574
jaegerd68@gmail.com

11. Defined Contribution Plans

Bruce Roed, Trustee
Mentor Fire Relief Association
14945 Maple Inn Road S.E.
Mentor, MN 56736
(218) 686-7233
broed@gvtel.com

12. State Auditor Rebecca Otto

Suite 500
525 Park Street
Saint Paul, MN 55103
Phone: (651) 296-2551
Fax: (651) 282-5298
state.auditor@state.mn.us

Instructions for Completing the Records Retention Schedule

1. Leave blank. The Minnesota Historical Society will assign a records retention schedule number upon receipt.
2. Indicate whether or not these are new record series or revisions to already approved records retention schedule(s). If these are revisions, list the retention schedule number(s) of the previously approved schedule(s).
3. Name of the agency with overall responsibility for the records.
4. Division and section that uses the record.
5. Complete mailing address of the agency. If the records are located elsewhere (e.g., regional offices, off-site storage) attach a listing.
6. The signature page must always be page one. Continuation pages are used to detail record series information. Double-click on the header of the continuation page to insert information in the header.
7. Leave blank. The State Records Disposition Panel will use this space to indicate any changes to the records retention schedule.
8. Signature of the Agency Records Management Officer who will receive the approved copy, and be contacted if the State Records Disposition Panel has any questions.
9. Type name and phone number of the Agency Records Management Officer below signature.
10. Approval by Agency Head or designee (required by M.S. 138.17, Subd.7).
- 11-13. Approval by the State Records Disposition Panel.
14. Number each series of records beginning with 1 (not Roman numerals). Use the item number(s) of the previously approved record series if these are revisions. A single letter can be used with the number (e.g., 2A, 2B) where multiple copies or multiple media within the same series are retained for different periods of time.
15. A RECORD SERIES is a group of records filed together because they all relate to a particular subject. All records in a series must have the same retention period. Begin with the name of the record series, followed with a complete description of the records. Abbreviations or acronyms may be used in the title, but an explanation must appear in the description. Avoid terms such as miscellaneous or general. The description should include:
 - a. Contents of the series (e.g., contracts, reports, applications, correspondence).
 - b. Purpose of the series.
 - c. Form numbers.
 - d. Whether these are originals or duplicates and where other copies are stored.
16. List the length of time that records will be stored in your agency and/or off-site storage. A number in this column means years; anything else should be stated (e.g., months). Use the letter P to mean permanent. If disposal is related to an event, state the complete retention (e.g., 4 years or audit whichever occurs first, or 10 years after case is closed).
17. Cite federal or state statutes that govern creation, retention, access, and data privacy.
18. Indicate with a yes or no if this record series is vital. A vital record is essential to the continuation or resumption of operations in your agency.
19. Leave blank. The Minnesota Historical Society will use this space to indicate whether or not the records series has archival or historical value.

Mail three copies of the completed and signed records retention schedule to:

Minnesota Historical Society
Minnesota State Archives
345 Kellogg Boulevard West
St. Paul, MN 55102-1906

1. Schedule Number	Date	2. New	Revision of	MINNESOTA RECORDS RETENTION SCHEDULE	
3. Agency		4. Division/Section		6. Page	1 of
5. Address				See attached page(s) for records description	
7. For Use By Records Panel Only					
AUTHORIZATION: Under the authority of M.S. 138.17, it is hereby ordered that the records listed on this application be disposed per approved schedule.			Notice: This retention schedule has been reviewed by the State Records Disposition Panel in accordance with Minnesota Statutes, Section 138.17. The records listed on this schedule have been reviewed for their historical, fiscal, and legal value.		
8. Entity Records Management Officer (signature)		Date		11. Minnesota Historical Society, Director	
9. Type Name / Phone				12. Legislative or State Auditor	
10. Entity Head or Designee (signature)		Date		13. Attorney General	
				Date	

Original-State Records Disposition Panel

Copy 1-Agency (after approval)

1. Schedule No.	3. Entity	4. Division/Section:	6. Page ___ of ___
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14. Item No.	15. Record Series Title and Description	16. Retention Instructions	17. Statute	18. Vital? (Yes/no)	19. Archival? (Yes/no)
1.	Administration				
a.	Articles of Incorporation	Permanent		Yes	
b.	Bylaws and Resolutions Reflecting Approval	Permanent		Yes	
c.	Attorney Opinions and Correspondence	Permanent			
d.	Publications and Meeting Notices	Until Superseded			
e.	Correspondence – General (includes paper and electronic)	3 Years			
f.	Correspondence – Official (includes paper and electronic)	Permanent			
g.	Grant Information and Documents	Consult Issuing Agency; 3 Years Minimum			
h.	Meeting Agendas and Minutes	Permanent			
i.	Policies and Procedures	Until Superseded			
2.	Contracts and Agreements	10 Years After Paid and Audited			
3.	Elections				
a.	Ballots	22 Months Unless Contested			
b.	Returns	Permanent			
4.	Financial				
a.	Annual State Reporting Forms (includes Broker Certification forms, Supplemental Benefit forms, OSA annual reporting forms, and actuarial valuations)	Permanent		Yes	
b.	Audit Reports	Permanent		Yes	
c.	Bank Statements	6 Years			

1. Schedule No.	3. Entity	4. Division/Section:	6. Page ___ of ___
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14. Item No.	15. Record Series Title and Description	16. Retention Instructions	17. Statute	18. Vital? (Yes/no)	19. Archival? (Yes/no)
d.	Budget Reports	2 Years			
e.	Certification of Required Municipal Contribution	Permanent			
f.	Checks (Cancelled and Voided)	6 Years			
g.	Check Register	Permanent		Yes	
h.	Equipment Inventories	Until Superseded			
i.	Fixed Asset Records	6 Years After Disposal			
j.	Fundraising Documents and Records	6 Years; Consult Gambling Control Board if Charitable Gambling Funds			
k.	Investment/Broker Reports and Documents	4 Years After Maturity			
l.	Ledgers and Journals	Permanent			
m.	Receipts and Receipt Books	6 Years			
n.	Treasurer's Reports	2 Years			
5.	Human Resources				
a.	Beneficiary Information				
b.	Benefit Enrollment Forms (e.g., VFBA Insurance)				
c.	Break in Service Information				
d.	Disability Claim Documentation				
e.	Employment Notices and Records				
f.	FMLA Documents				
g.	Grievance and Disciplinary Action Files	5 Years after Termination or Retirement			
h.	Letters of Resignation/Termination				
i.	Membership Application Forms				
j.	Member Dues Records	5 Years after Separation or Retirement			

1. Schedule No.	3. Entity	4. Division/Section:	6. Page ___ of ___
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14. Item No.	15. Record Series Title and Description	16. Retention Instructions	17. Statute	18. Vital? (Yes/no)	19. Archival? (Yes/no)
k.	Personnel Files				
l.	Service Credit Information (includes supporting documentation of benefit calculation and disbursement method)				
m.	Training Materials and Records	5 Years after Separation or Retirement			
6.	Insurance				
a.	Certificates of Insurance	6 Years after Expiration			
b.	Dishonesty/Surety Bonds	6 Years after Expiration			
7.	Payroll				
a.	Tax Withholding Records	6 Years			
b.	Payroll Ledger	Permanent			
c.	Time Sheets	6 Years			
d.	Tax Forms (includes 1099-R forms Issued to benefit recipients)	6 Years			

Volunteer Fire Relief Association Working Group

2010/2011 Potential Topic List

<u>Topic</u>	<u>Description</u>	<u>Holdover</u>	<u>New</u>
Administrative Expenses (69.80)	1. Consider allowing vice presidents to be paid salaries from the special fund.	x	
	2. Consider allowing deductibles for treasurer bonds to be paid from the special fund.	x	
Benefit Level Changes	3. Consider allowing benefit increases for lump sum plans to be prospective only, so that the increase would only apply to years of service performed after the date of the increase, while all previous service would be calculated at the prior benefit level.		x
Board of Trustees (424A.04)	4. Consider whether the fire chief should be a required trustee position on the board.	x	
	5. Allow more than one retired member to serve on the board of a relief association that offers a monthly or monthly/lump sum combination service pension.	x	
	6. Consider allowing for a combined secretary/treasurer position on the board.	x	
Contribution Calculations/Payment Requirements (69.772, 69.773)	7. Consider increasing the amortization period for lump sum plans to 20 years. Consider changing the amortization period for monthly and monthly/lump sum combination plans to 20 years for both investment and experience losses.	x	
	8. Consider allowing required contributions to be paid to relief associations in installment payments that extend beyond the calendar year in which they are due.	x	
Data Requests/Data Practices	9. Consider adding a specific fee for requests of relief association contact data. The money collected could be used for relief association pension training.	x	
Deferred Interest (424A.016, subd. 6 and 424A.02, subd. 7)	10. Allow deferred interest to be paid for completed years of deferral, with the year a floating year based on the member's separation date.		x
	11. Allow plans that only pay monthly benefits to offer deferred interest. Currently, only defined contribution and defined benefit plans that pay a lump sum benefit are authorized to pay deferred interest.		x
	12. Clarify that members who are vested and who separate from active service after age 50 are still deferred members until they submit their application for, and are paid, the service pension.		x
Defined Contribution Plans (424A.016)	13. Allow defined benefit plans to create a defined contribution plan that will provide retirement coverage for new members, while maintaining the defined benefit plan for current and retired members.		x
Flexible Service Pension Maximums (424A.02, subd. 3a)	14. Consider changing the flexible service pension maximum calculation to take greater consideration of the relief association's funded status.	x	
Investments (356A.06)	15. Require the relief association to hold a public meeting if the rate of return was below the plan's benchmark for two years in a row.	x	

<u>Topic</u>		<u>Description</u>	<u>Holdover</u>	<u>New</u>
Investment Reporting Requirements (356.219, subd. 3)	17.	Consider increasing the \$25 million dollar threshold that triggers more detailed investment reporting.		x
OSA-Related Changes	18.	Update the requirement in Chapter 609 that requires local units of government to report unlawful actions to include local public pension plans.	x	
	19.	Consider adding language to 69.051, subd. 1b that is similar to 6.50, giving the OSA authority to withhold just a portion of state aid or to certify eligibility for state aid even if certain requirements have not been met (e.g., as the State Auditor may deem the public interest to demand).		x
Return to Service (424A.01, subd. 6)	20.	Add language to the return to service provision that clarifies how pensions would be calculated for defined contribution plan members.		x
	21.	Consider allowing members who don't meet the minimum period of resumption service requirement to receive service credit for time served after the break, but not any benefit increases that occurred after the break.		x
	22.	Clarify for defined contribution plans how long accounts need to be kept intact for members who return to service and don't meet the minimum period of resumption service requirement (i.e., can the second account be forfeited immediately, or after five years).		x
Revenues	23.	Allow fundraising revenue from independent nonprofit firefighting corporations to be deposited into the relief association's special fund.		x
Rollovers (424A.015)	24.	Allow members to rollover their account balance to an IRA before reaching age 50.	x	
	25.	Allow rollovers in cases where the survivor benefit is payable to surviving children or to a designated beneficiary.		x
Service Credit	26.	Clarify that all pensions and benefits must be calculated at the rate in effect on the date of the member's separation from active service and membership. Consider including a specific formula for calculating a service pension.		x
	27.	Allow members to receive a year of service credit if they work at least a minimum number of days (e.g., 360 days).		x
	28.	Define how service credit should be calculated, documented, and credited.		x
Survivor Benefits (424A.02, subd. 9)	29.	Consider allowing funeral benefits to be paid from the special fund for plans that solely offer monthly service pensions.	x	
	30.	Consider defining the term "surviving child."		x
Technical Changes	31.	Clarify language in 424A.02, subd. 9(3)(i)(D) so that it reads: "...as a death benefit to the estate of the deceased active or deferred firefighter if <i>no surviving spouse</i> , no surviving children, and no beneficiary designated."		x

<u>Topic</u>		<u>Description</u>	<u>Holdover</u>	<u>New</u>
	32.	When 424A was recodified the language stating that credit must be given for all years of active service, except as otherwise provided in this section, was changed. Look at whether a caveat must be added so that the requirement that credit be given for all years of active service doesn't conflict with the return to service section, which prohibits service from being credited if don't meet the minimum period of resumption service requirement.		x
	33.	Update the phrase "licensed public accountant" to "certified public accountant" in 69 and 424A (424A.04 - conditions on consultants). Note that this may have been resolved during the 2010 session.		x
	34.	Include the HCMC retirement plan in the Alternative Reporting section.		x
	35.	Discuss reporting requirements for the alternative reporting plans. The plans only provide limited investment data to the OSA. Consider eliminating the reporting requirements for these plans, increasing the reporting requirements so that meaningful data is provided, or change to whom the reports should be filed if the data is just for informational purposes. (356.219, subd. 4.)		x
	36.	Add language adopted by the Working Group last year that was inadvertently omitted from the bill. The omission was a technical change that clarifies which plans are governed by Chapter 424A.		x
	37.	Update installment payment language for defined contribution plans so that recipients of service pensions and survivor benefits may elect to receive the benefit in installments. Defined benefit plans currently have this authority, while only recipients of a defined contribution plan service pension may elect installment payments.		x
	38.	Clarify whether inactive/separated not vested members in defined contribution plans are eligible for ancillary benefits.		x
	39.	Update 471.88, subd. 6a - an exception to the conflict of interest statute for fire departments that contract to provide fire services. The language is unclear.		x
	40.	Allow an official with the joint powers board to sign the Schedule Form in place of the city clerk, if the joint powers board is the fiscal agent for the fire department.		x
	41.	Require that relief associations review their bylaws at least annually for compliance with state statutes.		x
	42.	Change signature requirement on the RF so that any municipal official can sign. Consider what the signature requirement should be for relief associations affiliated with an unorganized territory and there is no affiliated municipality.		x
	43.	Allow member contributions/member dues to be deposited into the special fund.		x
Vesting Requirements (424A.02, subd. 2)	44.	Consider allowing lump sum and monthly plans to offer full vesting after 10 years of service.	x	