September 21, 1994
Room 107 Capitol

30th Meeting

LEGISLATIVE COMMISSION ON PENSIONS AND RETIREMENT

MINUTES

Senator Phil Riveness, Chair of the Legislative Commission on Pensions and Retirement, called the meeting to order at 2:17 P.M.

Commission members present:

Representatives Mindy Greiling, Bob Johnson, Phyllis Kahn, and Leo Reding
Senators Steven Morse, Lawrence Pogemiller, Phil Riveness, LeRoy Stumpf, and Roy Terwilliger

1. **Approval of Minutes of August 17 and 18, 1994 Meeting**
Rep. Bob Johnson moved approval of the August 17th and 18th meeting minutes. **MOTION PREVAILED.**

3. **Volunteer Fire Regulation Revision and Clarification**
Lawrence A. Martin, LCPR Executive Director, noted that members did not have a staff memorandum on this topic but did have copies of the current law relating to volunteer firefighters. He reviewed the organizations that would be making presentations at this meeting and stated that this topic was recommended by the Office of the State Auditor.

James Gelbmann, Deputy State Auditor for Research and Pension Oversight, began his presentation. Mr. Gelbmann noted that his presentation would focus on five topics, an overview of the infrastructure of volunteer fire relief associations, the role of the State Auditor in overseeing volunteer fire relief association activities and financing, an overview of the general financial stability of the relief associations, a review of the implementation of the investment performance law relative to all Minnesota public pension funds, and a review of the recommendations formulated by the State Auditor's Office to improve the operation and financing of volunteer fire relief associations.

Topic 1. Mr. Gelbmann provided historical and statistical background information on volunteer fire relief associations. He testified that there are 698 volunteer fire relief associations in Minnesota, their total assets are $158 million, their assets range from $687 to $47.1 million, and their membership ranges from 9 to 161 active firefighters. He further testified that benefit levels range from $10 per year of service, which provides a lump sum benefit of $200 for 20 years of service, to a lifetime benefit of $600 per month after age 50 for 20 years of service. He also testified that one metro relief association has an unfunded actuarial accrued liability of $1.1 million while a neighboring relief association has a $6.8 million surplus, that the assets of one relief association account for less than 30% of its current liability while the assets of another are 10 times greater than its current liability, and that 300 relief associations have their assets invested in CD's or cash equivalents while others have national money managers and highly diversified portfolios. Mr. Gelbmann provided further statistical information and continued with the first topic.

Topic 2. Mr. Gelbmann testified that state law prescribes that the State Auditor oversee the activities of Minnesota relief associations, ascertain that they are operating pursuant to Minnesota law, and, if not, the State Auditor is authorized to direct the Department of Revenue to withhold state aid from fire relief associations that are out of compliance. He further testified that it is illegal for Minnesota municipalities to provide contributions to a relief association that is not in compliance with Minnesota Statutes. The cost of this oversight function is deducted from the total fire state aid money prior to distribution to municipalities. He continued to provide background on the State Auditor's efforts to effectively respond to its mandated responsibilities and testified that in July of 1993, state aid was withheld from over 400 relief associations that were out of compliance with state law. He testified that it took ten months of intensive technical assistance from the State Auditor's office to bring the 400 relief associations into compliance.

Topic 3. Mr. Gelbmann testified that approximately 458 of the 698 relief associations do not have unfunded liabilities. He further testified that of the approximately 240 relief associations that have unfunded liabilities 107 of them are over 90% funded, 75 are between 80 and 90 percent funded, 29 are between 70 and 80 percent funded, 18 are between 60 and 70 percent funded, 9 are between 50 and 60 percent funded, and only 2 are less than 50% funded. The State Auditor's office is concerned with the number of relief associations that have increased their benefit levels and unfunded liabilities over the past three years. Mr. Gelbmann provided members with a table that showed 102 relief associations that had a deficit in 1990 and have since increased both their benefits and unfunded liabilities. He testified that there is no statutory requirement that volunteer fire funds ever achieve full funding.

Topic 4. Mr. Gelbmann reviewed the State Auditor's implementation and the volunteer firefighter relief associations' responses with regard to the reporting requirements passed in the 1994 Session. He stated that any investment shortfall may require an increased municipal contribution which may ultimately require increased taxes.

Sen. Riveness referred to the increasing deficit table that Mr. Gelbmann had previously provided and asked what was the basis for calculating any adjusted normal cost when a benefit increase was provided to active members. Mr. Gelbmann stated that a benefit increase that increases the unfunded liability must be amortized over the next ten year period. Any unfunded liability must be paid for with investment earnings, state aid, and municipal contributions. Discussion followed. Mr. Gelbmann proposed a threshold level which would require a relief association to be between 70% to 100% funded before it would be permitted to increase benefits. He testified that he does not have a recommendation at this time but hoped he would have a recommendation in the next few months. Rep. Reding referred to the table in statutes that permits relief associations with a certain funded status to increase benefits and asked whether that is effective in controlling benefit increases. Mr. Gelbmann testified that the table generally works but some municipalities are willing to increase their municipal contribution which increases the available funding for firefighters and permits benefit increases. He testified that the State Auditor's office is concerned about the spiraling effect this has and from the State Auditor's perspective, it is not sound public policy. Rep. Johnson stated that most of the 102 funds noted in the table remain well funded but those that are not are a concern. Discussion followed.

Sen. Morse questioned whether a municipality needs to sign off on a fire relief association's benefit increase. Mr. Gelbmann responded that the municipality does have to approve a benefit increase if the increase requires an increased municipal contribution. Discussion followed.

Rep. Kahn stated that charitable gambling proceeds are no longer permitted contributions to relief associations and that when they were permitted, municipalities were warned not to approve benefit increases based on charitable gambling contributions. She asked for Mr. Gelbmann's comments on the charitable gambling issue. Mr. Gelbmann testified that the State Auditor's office does check on whether charitable gambling is part of a relief association's funding.

Mr. Gelbmann testified that some relief associations that invest in CD's or cash equivalents do so to keep their money invested locally which is not always in the best financial interest of the relief association, the city, or the taxpayers. It often provides a substandard rate of return. He stated that it is essential that all parties involved understand all the ramifications of the relief association's investment decisions. Discussion followed. Sen. Riveness stated that many local relief associations do not have the expertise for sophisticated investments but the State Board of Investment is an alternative option for them. He also noted that the legislation passed last session did not require relief associations to alter their strategies, or take away their authorization to invest relief association assets, it only required them to disclose their investments. Sen. Morse noted that many of the local banks that relief associations invest with do not reinvest locally. Discussion followed.

Topic 5. Mr. Gelbmann testified that one of the recommendations from the State Auditor's Office was to permit relief associations of independent fire departments to combine to create one relief association to reduce costs. Discussion followed. (The recommendations of the State Auditor's Office are attached to these minutes as time constraints did not permit presentation at the Commission meeting.)

Gus Welter and Bob Wetherille, Minnesota State Fire Department Association, began their presentation. Mr. Wetherille testified in response to issues previously discussed. He noted that fire state aid is the main funding source for volunteer fire relief associations, that a few years ago, Sen. Berg amended a bill in the Senate that eliminated the use of charitable gambling proceeds for volunteer fire relief association pensions, and that the State Fire Department Association has consistently opposed using charitable gambling money to fund pensions although they have a written opinion from the Attorney General's office written prior to Sen.

Berg's amendment stating that it was a legitimate use of charitable gambling funds. Mr. Wetherille testified that his main concern is fire state aid. He provided historical background information on fire state aid and concluded by requesting that fire state aid be reinstated to the pre-1988 level. Discussion regarding why domestic mutual companies fire tax was reduced to 1/2% followed. Members suggested that the local relief associations talk to their home mutual insurance companies, convince them that firefighters protect the same property that the insurance companies would pay losses on, and that this is part of the benefit that the companies enjoy and they should be paying the 2% tax that other companies are paying.

Gus Welter provided a handout which provided the MN Fire Department Association list of items for Commission consideration for the 95 Session. Mr. Welter reviewed the items. He testified that an additional table should be included in Minnesota Statutes, Chapter 69.772, Subdivision 2, to deal with relief associations that do not earn a 5% or more investment gain. This would make relief associations aware of the cost of benefit increases and poor investment returns. He also suggested an amendment to 69.772, Subdivision 3, to establish a new method of calculating the next year's administrative expenses. Mr. Welter continued with his presentation. Sen. Stumpf asked Mr. Welter to elaborate on the suggested changes to 69.772, Subd. 3 and 69.773, Subd. 5, which dealt with contributions from the General Fund to the Special Fund. Discussion followed.

Sen. Riveness asked Stan Peskar, League of Minnesota Cities, if he would be able to return when the Commission revisits this topic. Mr. Peskar answered affirmatively.

The meeting adjourned at 4:00 P.M.

Joint Meeting
Legislative Audit Commission and Legislative Commission on Pensions and Retirement

September 22, 1994
Room 107 Capitol

Senator Phil Riveness, Chair of the Legislative Audit Commission and Legislative Commission on Pensions and Retirement, called the joint meeting to order at 10:25 A.M.

LCPR Commission members present:

Representatives Mindy Greiling, Bob Johnson, Phyllis Kahn, Gerald Knickerbocker, and Leo Reding
Senators Steven Morse, Lawrence Pogemiller, Phil Riveness, and Roy Terwilliger

Report by Allan Baumgarten, Concerning Oversight of Local Pension Funds

Sen. Riveness introduced the topic and requested James Nobles, Legislative Auditor, to provide background. Mr. Nobles testified that in August, 1993, there was an article in the Minneapolis Star Tribune that was critical of the oversight by the State Auditor's office with regard to MERF during the time that John Chenoweth was MERF's Executive Director. The article precipitated a series of hearings by the Legislative Audit Commission (LAC) and, as a result, the Legislative Auditor's Office performed a study to further review the State Auditor's oversight of MERF. In addition, the Legislative Auditor's Office hired Allan Baumgarten, an outside consultant, to do a broader study concerning the oversight of local pension funds.

Allan Baumgarten began his presentation. He testified that the LAC posed a series of issues to be addressed in the report. The issues were the role of local governance on local pension boards, the adequacy of audits performed on those local pension funds, the performance and role of the Legislature and the LCPR in oversight of local pension management, and if issues were found that needed resolution, Mr. Baumgarten was to make recommendations to the LAC.

Sen. Belanger asked why Bloomington Fire was listed as a paid fire fund. He stated that Bloomington is totally volunteer and does not have any paid employees. Sen. Riveness agreed with Sen. Belanger. Mr. Baumgarten testified that Bloomington Fire is not grouped with the volunteer fire departments in the State Auditor's report and he may have misunderstood the situation.

Mr. Baumgarten testified that oversight of local funds is done by a local governing board, by an annual audit, and by a number of state level organizations. The primary state level oversight is provided by the State Auditor's Office and the Legislative Commission on Pensions and Retirement.

Mr. Baumgarten found that attendance and participation on pension fund boards by local officials, which may include up to three representatives of local government, needs to improve. He testified that in some instances, where local officials did attend meetings and participate, they lacked the leverage to influence fund policies. He testified that in a sampling of completed reports required by the State Auditor's Office, errors frequently were made and in some cases the funds were not in compliance with state law. He stated that the State Auditor's audits could be improved by focussing more on specific compliance issues. He also stated that only LCPR staff is raising questions about certain administrative expenses, the appropriateness of some travel expenses, and some investment practices.

Mr. Baumgarten testified that the LCPR and the Legislature had considerable knowledge about questionable practices at MERF but did little with the information. He agreed that the statutory role of the LCPR is not investigative. Rep. Alice Johnson asked whether Mr. Baumgarten was saying that the Legislature should require comment from the auditor about investment practices, etc. in each audit. He recommended additional oversight of administrative or management issues by either the State Auditor's Office or by an ad hoc group. Rep. Johnson asked whether Mr. Baumgarten would recommend an evaluation of the Pension Commission with regard to its current and future mission. Mr. Baumgarten recommended that the Legislature reevaluate the role of the Commission and if it has investigative expectations, it should support those expectations with the resources, authority, and orientation required.

Rep. Dauner asked for more information on the Wisconsin pension program. Mr. Baumgarten testified that he had met with Blair Testin, the Staff Director for the two Wisconsin Retireme Commissions. Mr. Testin provided information on the differences between Minnesota and Wisconsin in terms of how pension funds and oversight are organized. Mr. Baumgarten reviewed the similarities and noted that all bills relating to pensions must be referred to and recommended by the Wisconsin Retirement Commission before any further legislative action occurs. He then reviewed the differences and noted that Wisconsin's Commission includes legislators as well as other public members. He recommended that the Commission consider that concept. Sen. Riveness asked how changing the LCPR membership would improve it. Mr. Baumgarten stated that outside members might enhance the process, would bring different perspectives, and might provide legislators with political cover.

Mr. Baumgarten reviewed his conclusions and recommendations which he put under four titles, consistency, fairness of benefits and financing, linking benefits to financing, and uniformity. He recommended that local officials improve their involvement in fund governance by attending board meetings and increasing their scrutiny of local funds financial reports. He further recommended that the legislature expand local official representation on fund boards, and authorize city councils and the three first class city school boards to appoint members of the public with pension expertise. Discussion followed. Rep. Alice Johnson expanded on the idea that municipalities might agree to levy to expand benefits locally and stated that it becomes a statewide issue if the legislature is requested to increase local government aids or provide property tax relief possibly due to that expansion of local pension benefits.

Rep. Bob Johnson asked if the report had specific recommendations that the Commission could discuss, evaluate, and put into statute. He also asked if there were specific recommendations for the Audit Commission and the Attorney General's Office. Mr. Baumgarten responded that the Legislature needs to decide how much oversight of pension plans is needed.

Rep. Reding stated that he was disturbed to see that one of Mr. Baumgarten's recommendations was to establish a centralized emergency medical personnel pension plan when this has already been done. Mr. Baumgarten responded that he was aware of that but believed the plan was still evolving in terms of benefit levels and uniformity among communities. Discussion followed.

Rep. Greiling asked Mr. Baumgarten to expand on his recommendations that the LCPR consider multi-year investment return standards rather than the addition of new reporting requirements to solve the volunteer fire issue. She stated that this recommendation was similar to the State Auditor's recommendation and questioned whether other states are doing this. M Baumgarten responded that oversight over hundreds of small plans individually investing public funds is difficult. The State Auditor's Office and staff of the Pension Commission as well as all the relief association funds are putting a lot of time and effort into completing and reviewing reports which may not be providing better oversight or results. Reducing the number of entities to oversee may be a solution. Setting an investment standard which, if not met, results in the State Board of Investment or a regional pool taking over that relief association's investment authority is his recommendation. He is not aware of any other states doing this. Rep. Kahn stated that the political reality may not permit putting investment standards in place. Discussion followed.

Sen. Riveness stated that he liked the concept of setting investment standards. He further stated that he was disappointed in some volunteer fire relief associations who opposed even the simplest reports on investment returns for funds with fairly large assets. They argue that those funds belong to their relief association and the public and the Legislature should have no interest in their performance. Sen. Riveness agreed with Mr. Baumgarten's conclusion that adding more reporting requirements is not sufficient but those reports may provide a sense of what can be done in the future with regard to setting performance standards.

Rep. Kahn questioned whether Wisconsin consolidates pension bills into an omnibus bill and how they handle the specific circumstances of individuals other than by introducing bills. Mr. Baumgarten responded that he does not know whether Wisconsin has an omnibus pension bill but he does know that with only three retirement associations, their starting point is much different and reduces the bill workload of their pension commission. Circumstances of individuals are dealt with in an executive branch agency.

Mr. Baumgarten recommended that the Legislature explore the possibility of an executive branch office that would have administrative responsibilities and thereby reduce the workload of the LCPR. He also recommended that the Governor or the Commissioner of Finance provide more leadership in pension matters by possibly bringing a pension policy bill before the Legislature every two years.

Sen. Morse stated that it seemed that this report highlighted three issues of concern with regard to volunteer fire relief associations. The concerns are that relief associations may increase benefits when the money is not there to support a benefit increase, that their investment returns may be poor and they may be foregoing investment gains, and that their is an administrative overburden in assessing whether or not the first two occur. He asked what feedback is provided to the local funds as a result of their filing the required reports. Sen. Riveness responded that a comparative report from the State Auditor's Office was a requirement of the investment disclosure bill enacted last session.

Sen. Spear commented on the omnibus pension bill issue. He stated that in the past, some omnibus pension bills were lost in conference committee or not passed for political reasons so some members who had non-controversial pension bills preferred to have their bills stand alone. Discussion followed.

Sen. Riveness stated that the LCPR would review the suggestions in this report specific to the Commission, would review whether there should be an agreement prior to the 1995 Session with regard to handling pension bills, and would review the LCPR staffing arrangements if the Commission determines its role to be beyond policy analysis, research, the management of bills, and review of financial reports.

The meeting adjourned at 12:00 P.M.

Jean Liebgott

Jean Liebgott, Secretary

STATE OF MINNESOTA
OFFICE OF THE STATE AUDITOR

SUITE 400
525 PARK STREET
SAINT PAUL 55103

MARK B. DAYTON
STATE AUDITOR

(612) 296-2551 (Vı
(612) 297-5353 (T__)

September 29, 1994

The Honorable Phil Riveness, Chair
Legislative Commission On Pensions And Retirement
317 Capitol
Saint Paul, Minnesota 55155

Dear Senator Riveness:

During my presentation before the Legislative Commission on Pensions and Retirement last week, I had intended to provide recommendations for ammending the statutes governing volunteer firefighters' relief associations. Unfortunately, due to my extended overview remarks and the number of questions asked by Commission members, I was unable to present the conceptual ideas our Office has developed for improvements in the law. Therefore, I would like to transmit these ideas to the Commission in writing.

As I mentioned in my oral testimony, our Office believes the current system for financing Minnesota's Volunteer Firefighters' Relief Associations is working well and there is no need for a major overhaul of the system. While the overall system is working well, I would like to raise several issues that the Legislative Commission on Pensions and Retirement may want to consider addressing during the 1995 Legislative Session.

After reviewing these issues, I will be interested in any feedback you may have. If you would like to see any of these issues addressed through draft legislation, I will be pleased to develop draft proposals for the Commission to consider during 1995 legislative session.

Improve the definition of independent accountant.

Currently, Minnesota Statutes allow any individual who has five or more years of accounting experience to audit local relief associations, as long as the individual is not a member of the relief association. This definition of a public accountant is very difficult to enforce; it is even more difficult to hold unlicensed individuals to any level of professional standards.

While our Office is capable of reviewing all forms and financial statements filed by the relief association, we do not have the resources to examine the books and accounts of all 698 associations. Reporting forms and financial statements may be intentionally falsified. The intentional falsification of statements and reporting forms is nearly impossible to detect without examining the books and records of the association and testing sample transactions for accuracy. Therefore, the state is depending upon the independent accountants to perform this on-site work as a deterrent against theft and misuse of relief association funds.

Based on some of the review opinions and attestations our Office has received in the past, it is highly questionable whether the standards we have prescribed for these opinions and attestations are being followed. By changing the definition of "independent accountant" to include only those individuals who are licensed Certified Public Accountants (CPAs) or Licensed Public Accountants (LPAs), our Office would have a higher level of comfort that the review of the books and records of the relief associations are being performed according to professional standards. If a CPA or an LPA fails to perform reviews and attestations according to professional standards prescribed by our Office and the industry, that individual risks jeopardizing her or his professional license. There are no similar sanctions for a non-licensed individual who fails to perform work up to industry standards.

Address issue of escalating deficits of certain relief associations.

In light of escalating unfunded liabilities for a number of relief associations, the legislature should consider establishing a minimum funding ratio threshold that must be maintained by the relief association after any benefit increase is adopted. Under current law, relief associations that have significant unfunded liabilities are able to increase their benefit levels and their unfunded liabilities as long as the "available financing per firefighter" is maintained at or above statutorily mandated levels. Under a possible legislative proposal, in addition to being required to meet the existing "available financing per firefighter" standard, relief associations would not be permitted to increase benefits if the increase would result in a funding ratio of less than 80 percent. (The 80 percent figure is arbitrary; the appropriate threshold could be determined through the legislative process.)

Require relief association meetings to be open to the public and all ex-officio members of the association receive formal notice of meetings

This is a recommendation our Office made last year. In a small number of cities, the mayor and the clerk, who are ex-officio members of the relief association, have complained that they are rarely informed when the relief association will be meeting. Although it seems relatively obvious that meeting notices should be sent to all members of the Board of Trustees, a statutory requirement to this effect will make it easier for our Office to take corrective action when there is clear evidence that ex-officio members are not being informed of meetings.

Although our Office also believes that meetings of the relief association Board of Trustees should be open to the public, and a statute should be written that would require public meetings, we do not recommend that relief association boards be subject to the existing open meeting law. In most cases, the members of the Board of Trustees who are firefighters meet weekly for practice and training. Given the amount of time these individuals are required to spend together, the civil penalties for violating the open meeting law may be too harsh, given the potential for these trustees to inadvertently discuss relief association business during training or practice sessions.

Consider possible incentives to encourage relief associations to take advantage of investment opportunities available through the State Board of Investment. Provide additional resources for the State Board to help market their program and administratively contend with an increase in the number of relief associations taking advantage of the opportunity.

Relief associations that are failing to achieve adequate rates of return on their investments should be encouraged to invest the majority of their assets with the State Board of Investment. Although our Office is actively encouraging this option, a statutory incentive for relief associations that are willing to invest with the State Board may help further our goal of adequate investment returns for all public pension funds. One ideal incentive may be to exempt relief associations that have invested at least 75 percent of their assets with the State Board of Investment from the investment disclosure reporting requirement. This type of incentive was attempted last year and was strongly opposed by certain relief associations.

If we are able successfully encourage many relief associations to invest with the State Board of Investment, the Legislature should consider appropriating sufficient resources for the Board to assist with the added workload. If more funding is made available for the Board, the Board should consider adding a full time investment advisor to work with the fire relief associations, helping them determine the appropriate allocation of assets among the separate investment options within the Minnesota Supplemental Investment Fund.

Clarify procedures that two or more relief associations can use to consolidate, even if their fire departments remain independent.

Many small relief associations are concerned that they no longer have the critical mass necessary to comply with the numerous reporting and auditing requirements. For relief associations with low benefits, minimal state aid payments, and relatively small assets, the cost of independent review opinions and the amount of effort necessary to complete all reporting forms may be overly onerous from the perspective of the relief associations.

Minnesota statutes currently do not explicitly allow two or more independent fire departments to form a single relief association. By amending statutes to recognize this discretionary option, the legislature may provide an alternative for the small relief associations that believe the current amount of oversight is excessive given their small size. If a significant number of relief associations take advantage of permissive statutory language authorizing discretionary consolidations of relief associations, our ability to provide adequate oversight for all relief associations may also be enhanced.

Authorize the portability of benefits from one association to another, so as not to penalize individuals who may move from a city prior to becoming fully vested in the plan.

Many relief associations currently have vesting periods of 15 or 20 years. While many associations also allow for partial vesting after five or more years of service, there is an absolute financial penalty for a volunteer firefighter who must relocate to another city before he or she has reached the early vesting threshold. For example, if a firefighter belongs to a relief association with a ten year early vesting provision, and is forced to relocate after nine years of service, that individual will get no benefits from the association. Furthermore, if the individual joins the volunteer fire department in her or his new city, she or he will not get credit for the nine years of service she or he has already contributed.

To address this situation, the legislature should amend the statute to allow for portability of benefits from one relief association to another when a firefighter relocates to another city and joins the fire relief association of his or her new city.

Review the state aid formula.

The current state aid formula does not necessarily provide aid to the relief associations based on their level of activity; nor is the level of need taken into consideration in allocating state aid dollars.

Our office attempted to compare volunteer fire relief association state aid payments to the number of fire calls within those municipalities to determine if there was any positive correlation between the two variables. Although the data collected by the State Fire Marshal on the total number of fire calls may not be 100 percent reliable, we found very little correlation between the number of fire calls and the amount of state aid paid to the relief associations. There were 15 fire departments that reported no emergency runs during 1992 and received state aid amounts ranging from $184 to $7,229. For the fire departments that reported one or more emergency runs in 1992, the amount of state aid per run ranged from $17.25 per run to $5,771 per run.

Our Office also noticed a disparate amount of state aid payments being made to the relief associations with the largest surpluses. For example, the two relief associations with the largest surpluses also receive the largest allocation of state aid. In fact, approximately 16.1 percent of all state aid for volunteer relief associations is allocated to the 20 relief associations with the largest actual surpluses.

Although the current state aid formula may be the best formula possible, the Legislature should be aware of these apparent disparities in how the funding is distributed. In light of these apparent disparities, we recommend that the Legislative Commission on Pensions and Retirement review the state aid formula and determine if changes to the formula are warranted.

I would like to thank you and the other members of the Legislative Commission on Pensions and Retirement for giving me this opportunity for presenting our recommendations for improving the statutes governing the activities and financing of Minnesota's Volunteer Firefighters' Relief Associations. I hope these written recommendations are helpful. I would be pleased to discuss these recommendations with you and other members of the Commission at your convenience.

With best regards.

Sincerely,

Jim Gelbmann

Jim Gelbmann
Deputy State Auditor

cc: Mr. Lawrence A. Martin