

Montgomery County Government Post-Employment Medical Benefits

GASB 75 Actuarial Information for the Year Ending June 30, 2020



Submitted by:
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April 23, 2020

Kay Russell Deerin Group Insurance Fund Manager Office of Human Resources 101 Monroe Street, 12th Floor, Room 1209 Rockville, MD 20850

Dear Kay:

The following report contains the GASB 75 actuarial information for the post-employment medical benefit (OPEB) Plan. GASB 75 is for employer accounting and will be disclosed in the FYE 2020 CAFR notes to the financial statements. The GASB 75 information has been provided as of the June 30, 2019 measurement date for FYE 2020.

Methodology, Reliance and Certification

This report is prepared for the Montgomery County Government (the Government). The report contains the actuarial information to be included with the Government's financial statements (the Government's fiscal year end date) as required by GASB 75. This information has been prepared for use in the financial statements of the Government. This information is not intended for, nor should it be used for, any additional purposes.

The Plan is a cost sharing plan with each participating agency being a separate employer. Under GASB 75 cost sharing plans allocate the total Plan OPEB liability between employers. We have included an exhibit that shows the allocation by employer (agency) for FYE 2020. This allocation is based on the ADC of each employer. The prior GASB 75 disclosures (FYE 2018 and FYE 2019) included a development of the GASB 75 expense in total but not by individual employer. While we do have the total expense for all of the employers from the prior actuary's report, we were not provided with an allocation of the FYE 2019 actuarial determined contribution (ADC) by employer. We used the prior data and assumptions that were used to try to duplicate the prior results. We allocated the FYE 2019 ADC based on our results by employer and total. While our total ADC was not equal to the total ADC determined by the prior actuary, we are not aware of any biases that would result as a result of using this method.

The methods, assumptions, participant data, and plan provisions are detailed in the FYE 2020 and FYE 2021 Actuarial Valuation report dated October 11, 2019.

The Government has selected a June 30, 2019 measurement date for the FYE 2020 disclosure. The GASB 74 report included liabilities for the Cadillac Tax. The December 2019 Federal Appropriations Bill eliminated the excise tax on high cost plans that was part of the Affordable Care Act (this excise tax is commonly referred to as the "Cadillac Tax"). It is our understanding from Paragraph 30 of the GASB 75 Standard that the disclosure should be "in accordance with the benefit terms and any additional legal agreements to provide benefits that are in force at the measurement date". Accordingly, we have <u>not</u> adjusted the results to show the impact of the elimination of the excise tax which was signed into law after the measurement date. The change in the law could reduce retiree health care OPEB accounting liabilities by 3 to 5 percent and will be disclosed on next year's report. You may want to consult with your auditors to ensure that they concur with our understanding.



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Methodology, Reliance and Certification

The included calculations assume that the members and the Government will continue to make all required actuarially determined contributions. Based on that assumption, the plan's fiduciary net position is expected to be available to make all future benefit payments until 2063.

The long-term nominal expected rate of return on OPEB plan investments was determined using a building-block method where return expectations are established for each asset class. The building-block approach uses the current underlying fundamentals, not historical returns. For example, spread and the risk-free rate are used for fixed income; and dividends, earnings growth and valuation are used for equity. These return expectations are weighted based on asset/target amounts. The investment returns by investment class and the plan's asset investment policy were provided by the Government.

Future medical care cost increase rates are unpredictable and could be volatile. They will depend upon the economy, future health care delivery systems and emerging technologies. The trend rate selected is based on an economic model developed by a health care economist for the Society of Actuaries. Future medical trend increases could vary significantly from the model. Model inputs will be updated periodically based on the best estimate of the economy at that time. The sensitivity of results to a 1% increase or decrease in assumed trend is shown in this report.

This is a deterministic valuation in that it is based on a single set of assumptions. This set of assumptions is one possible basis for our calculations. Other assumptions may be equally valid. The future is uncertain, and the plan's actual experience will differ from the assumptions; the differences may be significant or material because the results are very sensitive to the assumptions made and, in some cases, to the interaction between the assumptions. We may consider that some factors are not material to the valuation of the plan and may not provide a specific assumption for those factors. We may have used other assumptions in the past. We will likely consider changes in assumptions at a future date.

The Government is responsible for selecting the plan's funding policy and assumptions. The policies, methods and assumptions used in this valuation are those that have been so prescribed and are described in the FYE 2020 and FYE 2021 Actuarial Valuation report dated October 11, 2019. The Government is solely responsible for communicating to Bolton Partners, Inc. any changes required thereto.



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Methodology, Reliance and Certification

This report is based on plan provisions, census data, and claims data submitted by the Government and their providers. We have relied on this information for purposes of preparing this report but have not performed an audit. The accuracy of the results presented in this report is dependent upon the accuracy and completeness of the underlying information. The plan sponsor is solely responsible for the validity and completeness of this information.

The information in this report was prepared for the internal use of the Government, the plan and their auditors in connection with our actuarial valuations of the OPEB plan as required by GASB 75.

This report may not be used for any other purpose; Bolton Partners, Inc. is not responsible for the consequences of any unauthorized use or the reliance on this information by any other party.

We make every effort to ensure that our calculations are accurately performed. These calculations are complex. Despite our best efforts, we may make a mistake. We reserve the right to correct any potential errors by amending the results of this report or by including the corrections in a future valuation report.

This report provides certain financial calculations for use by the auditor. These values have been computed in accordance with our understanding of generally accepted actuarial principles and practices and fairly reflect the actuarial position of the plan. The various actuarial assumptions and methods which have been used are, in our opinion, appropriate for the purposes of this report.

The report is conditioned on the assumption of an ongoing plan and is not meant to present the actuarial position of the plan in the case of plan termination. 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), and changes in plan provisions or applicable law.

Bolton Partners is completely independent of Montgomery County Government, its programs, activities, its officers, and key personnel. Bolton Partners, and anyone closely associated with us, does not have any relationship which would impair or appear to impair our objectivity on this assignment.

The undersigned credentialed actuary meets the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein. The FYE 2020 and FYE 2021 Actuarial Valuation report dated October 11, 2019 contains information that is integral to the results contained herein and a copy may be provided upon request.

Respectfully submitted,

Kevin Binder, FSA, EA

Mark Lynne, CEBS





Agency Allocation

Below is an allocation of the Net OPEB Liability by participating Agencies. These amounts are determioned based on the proportion of Liabilty for the measurment year ending June 30, 2019. These allocation percentage will be used to prepare the FY2020 GASB75 disclosures

Agency	FYE 2019 Actuarially Determined Contribution (ADC)	Net OPEB Liability 6/30/2019	Percent of Liability 6/30/2019
Montgomery County Government	\$112,936	\$825,636,740	96.7431%
State Department of Assessment and Taxation	\$163	\$1,194,805	0.1400%
Montgomery County Employees Federal Credit Union	\$209	\$1,530,204	0.1793%
Housing Opportunities Commission of Montgomery County	\$2,708	\$19,797,920	2.3198%
Montgomery County Revenue Authority	\$421	\$3,078,330	0.3607%
Strathmore Hall Foundation, Inc.	\$228	\$1,670,167	0.1957%
Village of Friendship Heights	\$46	\$337,106	0.0395%
Washington Suburban Transit Commission	\$26	\$186,902	0.0219%
Total	\$116,737	\$853,432,174	100.00%



Change in Net OPEB Liability

	Total OPEB Liability (a)	Plan Fiduciary Net Position (b)	Net OPEB Liability (a) - (b)
Balance as of June 30, 2018 for FYE 2019	\$1,823,142,490	\$492,078,607	\$1,331,063,883
Changes for the Year			
Service Cost	70,518,206		70,518,206
Interest	111,580,719		111,580,719
Changes of Benefit Terms	0		0
Experience Losses/(Gains)	(351,021,508)		(351,021,508)
Trust Contribution - Employer		77,208,188	(77,208,188)
Net Investment Income		39,922,676	(39,922,676)
Changes in Assumptions	(191,917,617)		(191,917,617)
Benefit Payments (net of retiree contributions)	(55,114,260)	(55,114,260)	0
Administrative Expense		(339,355)	339,355
Net Changes	(415,954,460)	61,677,249	(477,631,709)
Balance as of June 30, 2019 for FYE 2020	\$1,407,188,030	\$553,755,856	\$853,432,174
Funded status		39.35%	



OPEB Expense - Required by GASB 75

1. Service Cost	\$ 70,518,206
2. Interest	111,580,719
3. Projected Earnings on OPEB Trust	(37,721,692)
4. OPEB Administrative Expense	339,355
5. Changes in Benefit Terms	0
6. Differences Between Expected and Actual Earnings	
In Current Fiscal Year Recognized in Current Year	(440,197)
From Past Years Recognized in Current Year	(4,402,485)
Total	(4,842,682)
7. Differences Between Expected and Actual Experience	
In Current Fiscal Year Recognized in Current Year	(52,944,421)
From Past Years Recognized in Current Year	(3,164,168)
Total	(56,108,589)
8. Changes in Assumptions	
In Current Fiscal Year Recognized in Current Year	(28,946,850)
From Past Years Recognized in Current Year	(72,300,677)
Total	(101,247,527)
9. Total OPEB Expense	\$ (17,482,210)



Sensitivity of Total and Net OPEB Liability - Required by GASB 75

The following table presents Montgomery County Government's Total and Net OPEB liability. We also present the Total and Net OPEB liability if it is calculated using a discount rate that is 1 percentage point lower or 1 percentage point higher.

	1% Decrease	Discount Rate	1% Increase
Discount Rate	5.10%	6.10%	7.10%
Total OPEB Liability	\$1,606,785,220	\$1,407,188,030	\$1,243,882,690
Net OPEB Liability/(Asset)	\$1,053,029,364	\$853,432,174	\$690,126,834

The following table presents Montgomery County Government's Total and Net OPEB liability. We also present the Total and Net OPEB liability if it is calculated using a health care cost trend rate that is 1 percentage point lower or 1 percentage point higher.

Ultimate Trend	1% Decrease 2.68%	Medical Trend	1% Increase 4.68%
Ollimate Trend	2.00%	3.00%	4.00%
Total OPEB Liability	\$1,235,596,269	\$1,407,188,030	\$1,621,568,009
Net OPEB Liability/(Asset)	\$681,840,413	\$853,432,174	\$1,067,812,153



Deferred Inflows/Outflows of Resources Related to OPEB - Required by GASB 75

For the fiscal year ended June 30, 2020, Montgomery County Government recognized an OPEB expense of -\$17,482,210. At June 30, 2020, Montgomery County Government reported deferred outflows of resources and deferred inflows of resources related to the OPEB plan from the following sources:

	Deferred of Res	Outflows ources	ferred Inflows f Resources
Differences between expected and actual experience	\$	-	\$ 312,841,529
Changes of assumptions		-	514,082,660
Net difference between projected and actual earnings		-	11,899,018
on OPEB plan investments			
Employer contribution subsequent to measurement date		TBD	
Total	\$	-	\$ 838,823,207

An amount to be determined will be reported as deferred outflows of resources related to OPEB resulting from employer contribusubsequent to measurement date will be recognized as a reduction of the net OPEB liability in the year ended June 30, 2021.

Other amounts reported as deferred outflows of resources and deferred inflows of resources related to the OPEB plan will be recognized in the expense as follows:

Fiscal Year ended June 30:	
2021	\$ (162,198,798)
2022	(162,198,796)
2023	(159,129,576)
2024	(157,796,312)
2025	(143,609,511)
Thereafter	(53,890,214)



Schedule of Differences between Projected and Actual Earnings on OPEB Plan Investments

In conformity with paragraph 86b of Statement 75, the effects of differences between projected and actual earnings on OPEB plan investments are recognized in collective OPEB expense using a systematic and rational method over a closed five-year period, beginning in the current reporting period. The following table illustrates the application of this requirement.

			Inc	rease (Decr	ease)	in OPEB E	kper	nse Arising fro	m t	he Recognitio	n of	Differences b	oetween Projecte	d an	d Actual Earni	ngs on OPEB F	lan In	vestments
	Differences																	
	between Projected																	
	and Actual Earnings																	
Year	on OPEB Plan Investments	Period (Years)		2016		2017		2018		2019		2020	2021		2022	2023		2024
	*	(10010)		2010		2011		LUIU		2010		2020			LULL	2020		LULT
2016	\$ -	5	\$	-		-		-		-		-						
2017	-	5			\$	-		-		-		-	-					
2018	(15,346,103)	5					\$	(3,069,221)		(3,069,221)		(3,069,221)	(3,069,221)		(3,069,219)			
2019	(6,666,319)	5							\$	(1,333,264)		(1,333,264)	(1,333,264)		(1,333,264)	(1,333,263)	
2020	(2,200,984)	5								·	\$	(440,197)	(440,197)		(440,197)	(440,197)	(440, 196)
Net increa	ase (decrease) in OPEB	expense	\$	-	\$	-	\$	(3,069,221)	\$	(4,402,485)	\$	(4,842,682)	\$ (4,842,682)	\$	(4,842,680)	\$ (1,773,460	\$	(440,196)

Deferred Outflows of Resources and Deferred Inflows of Resources Arising from Differences between Projected and Actual Earnings on OPEB Plan Investments

					nces at 30, 2019
Year	Investment Earnings Less than Projected (a)	Investment Earnings Greater Than Projected (b)	Amounts Recognized in OPEB Expense Through June 30, 2019 (c)	Deferred Outflows of Resources (a) - (c)	Deferred Inflows of Resources (b) - (c)
2016	\$ -	\$ -	\$ -	\$ -	\$ -
2017	-	-	-	-	-
2018	-	15,346,103	9,207,663	-	6,138,440
2019	-	6,666,319	2,666,528	-	3,999,791
2020	-	2,200,984	440,197	-	1,760,787
				\$ -	\$ 11,899,018



Schedule of Differences between Expected and Actual Experience

In conformity with paragraph 86a of Statement 75, the effects of differences between expected and actual experience are recognized in collective OPEB expense, beginning in the current reporting period, using a systematic and rational method over a closed period equal to the average of the remaining service lives of all employees that are provided with OPEB through the OPEB plan (active and inactive employees), determined as of the beginning of the measurement period. The following table illustrates the application of this requirement.

Voor	Differences between Expected and Actual	Period	Deiter	2045		2046	Inc		ease)					tween Expected a			2025	Thomaston
Year	Experience	(Years)	Prior	2015	5	2016		2017		2018	2019	2020	2021	2022	2023	2024	2025	Thereafter
Prior			\$ -	•	-		-		•	-	-	-	-	-	-	-	-	-
2015	-	1		\$	-													
2016	-	1				\$	-											
2017	-	1					\$											
2018	(22,113,781)	7.63							\$	(2,898,267)	(2,898,267)	(2,898,267)	(2,898,267)	(2,898,267)	(2,898,267)	(2,898,267)	(1,825,912)	-
2019	(1,877,264)	7.06								, , , ,	\$ (265,901)	(265,901)	(265,901)	(265,901)	(265,901)	(265,901)	(265,901)	(15,957)
2020	(351,021,508)	6.63									, , ,	\$ (52,944,421)	(52,944,421)	(52,944,421)	(52,944,421)	(52,944,421)	(52,944,421)	(33,354,982)
Net increa	se (decrease) in (OPEB expense	\$ -	· \$	-	\$	- \$. \$	(2,898,267)	\$ (3,164,168)	\$ (56,108,589)	\$ (56,108,589)	\$ (56,108,589)	\$ (56,108,589)	\$ (56,108,589)	\$ (55,036,234)	\$ (33,370,939)

Deferred Outflows of Resources and Deferred Inflows of Resources Arising from Differences between Expected and Actual Experience

Voor		perience Losses	Experi Gail	าร	OPEE	unts Recognized in B Expense Through June 30, 2019	Outfle Reso	June 3 erred ows of eurces	oces at 20, 2019 Defer Inflow Resou	s of rces
Year Prior	\$	(a)	(b)	_	\$	(c)	Φ	- (c)	(b) -	
	Ф		Ψ		Ф	-	Ф	-	Ф	-
2015		-		-		-		-		-
2016		-		-		-		-		-
2017		-		-		-		-		-
2018		-		22,113,781		8,694,801		-	13,41	18,980
2019		-		1,877,264		531,802		-	1,34	15,462
2020		-		351,021,508		52,944,421		-	298,07	77,087
							\$	-	\$ 312,84	11,529



Schedule of Changes of Assumptions

In conformity with paragraph 86a of Statement 75, the effects of changes of assumptions should be recognized in OPEB expense, beginning in the current reporting period, using a systematic and rational method over a closed period equal to the average of the remaining service lives of all employees that are provided with OPEB through the OPEB plan (active and inactive employees), determined as of the beginning of the measurement period. The following table illustrates the application of this requirement.

		Recognition		Increase (Decrease) in OPEB Expense Arising from the Effects of Changes of Assumptions												
Year	Changes of Assumptions	Period (Years)	Prior	20	15	2016	201	17 2018	2019	2020	2021	2022	2023	2024	2025	Thereafter
Prior	\$ -		\$	-	-		-		-	-	-	-	-	-	-	-
2015	-	1		\$	-											
2016	-	1			\$	\$	-									
2017	-	1					\$	-								
2018	(261,363,550)	7.63						\$ (34,254,725)	(34,254,725)	(34,254,725)	(34,254,725)	(34,254,725)	(34,254,725)	(34,254,725)	(21,580,475)	-
2019	(268,604,422)	7.06							\$ (38,045,952)	(38,045,952)	(38,045,952)	(38,045,952)	(38,045,952)	(38,045,952)	(38,045,952)	(2,282,758)
2020	(191,917,617)	6.63								\$ (28,946,850)	(28,946,850)	(28,946,850)	(28,946,850)	(28,946,850)	(28,946,850)	(18,236,517)
Net incre	ase (decrease) in C	PEB expense	\$	- \$	- \$	\$	- \$	- \$ (34,254,725)	\$ (72,300,677)	\$ (101,247,527)	\$ (101,247,527)	\$ (101,247,527)	\$ (101,247,527)	\$ (101,247,527)	\$ (88,573,277)	\$ (20,519,275)

Deferred Outflows of Resources and Deferred Inflows of Resources Arising from Changes of Assumptions

								Balances at June 30, 2019			
Year	Increases in the Total OPEB Liability (a)		OPEB	in the Total Liability b)	Amounts Recognized in OPEB Expense Through June 30, 2019 (c)			Deferred utflows of esources (a) - (c)			
Prior	\$	-	\$	-	\$		- \$	-	\$		
2015		-		-			-	-			
2016		-		-			-	-			
2017		-		-			-	-			
2018		-		261,363,550		102,764,17	5	-	158,599,3		
2019		-		268,604,422		76,091,90	4	-	192,512,5		
2020		-		191,917,617		28,946,85	0	-	162,970,7		
							\$	-	\$ 514,082,6		



Schedule of Changes in the Total Liability and Related Ratios - Required by GASB 75

Changes in Employer's Net OPEB Liability and Related Ratios

Last 10 Fiscal Years

Disclosure for fiscal year ending: Measurement Date:	2020 6/30/2019	2019 6/30/2018	2018 6/30/2017	2017 6/30/2016	2016 6/30/2015	2015 6/30/2014	2014 6/30/2013	2013 6/30/2012	2012 6/30/2011	2011 6/30/2010
Total OPEB liability										
Service Cost	\$ 70,518,206	\$ 65,155,686	\$ 73,126,875							
Interest Cost	111,580,719	117,685,710	116,270,504							
Changes in Benefit Terms	-	-	-							
Differences Between Expected and Actual Experience	(351,021,508)	(1,877,264)	(22,113,781)							
Changes of Assumptions	(191,917,617)	(268,604,422)	(261,363,550)			Information	for FYE 2017			
Benefit Payments	(55,114,260)	(50,319,668)	(56,938,631)			and earlier is	not available			
Net Change in Total OPEB Liability	(415,954,460)	(137,959,958)	(151,018,583)							
Total OPEB liability - Beginning of Year	1,823,142,490	1,961,102,448	2,112,121,031							
Total OPEB Liability - End of Year	1,407,188,030	1,823,142,490	1,961,102,448							

Plan Fiduciary Net Position

Last 10 Fiscal Years

Disclosure for fiscal year ending: Measurement Date:	2020 6/30/2019	2019 6/30/2018	2018 6/30/2017	2017 6/30/2016	2016 6/30/2015	2015 6/30/2014	2014 6/30/2013	2013 6/30/2012	2012 6/30/2011	2011 6/30/2010
Contributions - Employer	\$ 77,208,188	\$ 63,725,810	\$ 122,466,187							
Net Investment Income	39,922,676	40,066,004	42,759,085							
Benefit Payments (net of retiree contributions)	(55,114,260)	(50,319,668)	(56,938,631)							
Administrative Expense	(339,355)	(276,553)	(4,292,538)							
Net Change in Fiduciary Net Position	61,677,249	53,195,593	103,994,103							
Fiduciary Net Position - Beginning of Year	492,078,607	438,883,014	334,888,911							
Fiduciary Net Position - End of Year	553,755,856	492,078,607	438,883,014							
Net OPEB Liability	853,432,174	1,331,063,883	1,522,219,434							
Fiduciary Net Position as a % of Total OPEB Liability	39.35%	26.99%	22.38%							
Covered-Employee Payroll ¹	\$ 785,379,904	\$ 766,111,522	\$ 750,986,381							
Net OPEB Liability as a % of Payroll ¹	108.66%	173.74%	202.70%							
Expected Average Remaining Service Years of All Participants	6.63	7.06	7.63							

Notes to Schedule:

Benefit changes: None.

Changes of assumptions: The discount rate was changed as follows:

Discount Rate:	
6/30/2017	5.88%
6/30/2018	6.26%
6/30/2019	6.10%

The trend, mortality, and other decrement assumptions were updated as described in the valuation report dated October 11, 2019.



Schedule of Changes in the Actuarially Determined Contribution and Related Ratios - Required by GASB 75

Schedule of Employer Contributions Last 10 Fiscal Years

	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011
Actuarially determined contribution	\$ 116,737,000	\$ 117,474,000	\$ 112,702,000							
Contributions in relation to the actuarially determined contribution Contribution deficiency (excess)	77,208,188 \$ 39,528,812	63,725,810 \$ 53,748,190	122,466,187 \$ (9,764,187)			Ir	nformation for FY earlier is not av			
Covered-employee payroll ¹	\$785,379,904	\$ 766,111,522	\$ 750,986,381							
Contributions as a percentage of covered employee payroll ¹	9.83%	8.32%	16.31%							

Notes to Schedule

Benefit changes None. Valuation date 7/1/2018

Changes of assumptions None. Methods and assumptions used to determine contribution rates: Valuation Date 7/1/2018

Actuarial cost method Projected Unit Credit Level percent of payroll Amortization method

30 Year open Remaining amortization period

Asset valuation method Market value of assets

Investment rate of return Payroll growth rate

Vary based on participant group and service. Increases start between 6.00% and 9.50% at hire and decrease to 3.25% after 20 years of service. Inflation

3.00%

Mortality For healthy retirees and beneficiaries - RP-2014, sex distinct, fully generational assuming MP-2015

For disabled retirees - RP-2014 healthy annuitant, sex distinct, fully generational using MP-2015, set forward 6 years for males and 8 years for females

Vary based on plan selected and duration. Below is a summary of the initial and ultimate trend for each plan. Healthcare cost trend rate

> Plan Initial pre-65, Initial post-65, Ultimate Active (Medical and Rx) 7.34%, 7.46%, 4.50% POS Medical (without Rx) 6.80%, 5.50%, 4.50% POS Medical with Standard Plan 7.40%, 7.53%, 4.50% POS Medical with High Plan 7.63%, 7.83%, 4.50% Indemnity Medical with Rx 8.11%, 7.64%, 4.50% UHC Medical without Rx 6.80%, 5.50%, 4.50% UHC Medical with Standard Plan 7.42%, 7.29%, 4.50% UHC Medical with High Plan 7.65%, 7.60%, 4.50% Kaiser Medical 6.80%, 5.50%, 4.50% Dental 4.50%, 4.50%, 4.50% **EGWP** N/A, 9.00%, 4.50%

The actuarially determined contribution and contributions in relation to the actuarially determined contribution are provided as of the measurement date. For example, the FYE 2020 disclosure (using a measurement date of 06/30/2019) is reporting the ADC and contributions made during the period 7/1/2019 - 06/30/2019.

7.50%

^{1/} Based on the salary information provided from Montgomery County and the prior actuarial disclosure report.